



April 21, 2021

Heber Wild Horse Territory Management Plan
P.O. Box 640
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Submitted via CARA

To whom it may concern:

These comments on the *Heber Wild Horse Territory Plan*, (#18916), are submitted on behalf of the American Wild Horse Campaign (“AWHC”) and the Salt River Wild Horse Management Group (“SRWHMG”), collectively “the Groups.”

AWHC is a national nonprofit organization dedicated to preserving the American wild horse in viable free-roaming herds for generations to come, as part of our national heritage. Our grassroots efforts are supported by a coalition of over 60 historic preservation, conservation, horse advocacy and animal welfare organizations.

SRWHMG is an Arizona 501(c)3 organization dedicated to the preservation and humane management of the Salt River wild horses. SRWHMG is currently under contract with the Arizona Department of Agriculture (“AZDA”) and works in partnership with the Tonto National Forest. SRWHMG receives funding and support solely from the public and charges the government zero dollars for their programs, including the highly successful PZP fertility control program.

I. OVERVIEW

These comments are submitted pursuant to the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321-4370h, and the Council on Environmental Quality’s regulations that implement NEPA, 40 C.F.R. §§ 1500.1-1508.28.

The Heber Wild Horse Territory (“WHT” or “Heber Territory”) is made up of 19,700 acres of public lands in Arizona. The U.S. Forest Service (“USFS” or “Forest Service”) estimated that there are roughly 22-51 wild horses currently within the WHT and approximately 270-420 wild horses outside of the WHT. The “Appropriate” Management Level (“AM”) is set for 50-104 wild horses within the WHT. However, the Environmental Assessment (“EA”) fails to adequately consider increasing the AML, even while it admits the majority of the comments from the public asked for an increase of the AML. To hypothetically achieve the low AML, the USFS would have to permanently remove all the wild horses outside the WHT, which, while not

specified in the EA, reaches far and wide all across northern Arizona where pockets of wild horses remain, all while livestock grazing is still allowed in the WHT *and* outside of it.

The EA also fails to consider humane, in the field management of this popular herd *before* removals. Instead of costly large-scale removals USFS has to consider fertility control management before wild horses are removed. Removals cannot be viewed as “management,” but should rather be seen as simply a stop gap measure when there has been an absence or lack of proper management. Actual on range wild horse management is designed to stabilize the population and prevent the need for removals altogether. This herd is of the size that it can still be managed, even at the current level, using PZP fertility control to reduce population growth rates and population size, over time. As the EA notes, the PZP vaccine is a scientifically proven and cost-effective approach for reducing wild horse population growth rates and numbers over time. It is widely supported by mainstream humane and wild horse protection organizations. However, the vaccine must be used on a sufficient scale to impact population growth rates. (NAS Report, p. 99-112).

As such, and as described in more detail below, it is the Groups’ position that the USFS:

- Revisit and seriously consider increasing the AML and instead provide for a range that will give wild horses their fair share of public rangelands. At the very least, the EA must account for the use of a comprehensive PZP program before removal, and thus the absence of a need to achieve the low AML; meaning, that if removals occur, they should be incremental, over time, and only when absolutely necessary. Horses should then be offered for adoption to the Arizona public in pairs instead of adding to the already full off-range holding facilities.
- Adequately consider how reducing the population to a detrimental population number, just to let them grow again to 104, is not acceptable when viable and humane birth control is a simple and cost-effective option. The USFS must consider the high AML to be a population number applied with a goal of reducing the population growth over time, through birth control. Said another way, if the AML is 104, then the starting AML should be 200 in order to humanely reduce to 104 over time.
- Adequately consider how the current plan, to reduce the population so detrimentally just to have to add mares from outside the Territory for genetic viability concerns, is not acceptable when the original, and historically important, Heber mares should simply be retained but instead have fewer or no foals, through the implementation of a comprehensive fertility control program, until the population reaches desirable levels.
- Adequately consider the immediate start of a robust PZP program to manage the wild horses on the range. A real concerted effort should be put into documenting each band and the migrating patterns, while accommodating the current wild horse numbers with range improvements, fence removal (and boundary adjustment), cattle reductions, and water source improvements. USFS should certify volunteers and personnel immediately to dart PZP, in order to ensure that every mare is darted before giving birth to this year's foal. This way, each mare will not have a foal next year, and every foal not born in the

future is one less horse for the USFS to remove in the future. Such a plan would lead to less cost to taxpayers and a more sustainable management for the foreseeable future.

- Drop consideration for the use of any alternate form or method of birth control, other than native PZP. IUDs in mares as a form of fertility control is an unproven and dangerous method of birth control, and sex ratio skewing is even worse for the wellbeing of the horses.
- Consider productive working relationships with Non-Governmental Organizations, including establishing public-private partnerships to implement the fertility control program and prevent future removals.

In short, the Groups strongly encourage the USFS to begin immediate implementation of a comprehensive PZP vaccine-based fertility control program for the WHT and to abandon any plan for the use of mass roundups, which are not supported by the majority of the public. As further articulated below, in the final EA USFS should engage in a meaningful analysis of the effects of, and reasonable alternatives to, the permanent removal of wild horses from the WHT.

I. LEGAL BACKGROUND

A. NEPA

Congress enacted the National Environmental Policy Act (“NEPA”) more than four decades ago “[t]o declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment . . .” 42 U.S.C. § 4321. In light of this mandate, the Supreme Court has found that NEPA is “intended to reduce or eliminate environmental damage and to promote ‘the understanding of the ecological systems and natural resources important to’ the United States.” *Dep’t of Transp. v. Pub. Citizen*, 541 U.S. 752, 756 (2004) (quoting 42 U.S.C. § 4321). NEPA is intended to “ensure[] that [federal agencies]... will carefully consider, detailed information concerning significant environmental impacts” and “also guarantees that the relevant information will be made available to the larger [public] audience.” *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989).

In NEPA’s implementing regulations, there are two specific mechanisms whereby federal agencies must evaluate the environmental and related impacts of a particular federal action – an EA and an EIS. *See* 42 U.S.C. § 4332(c). These procedural mechanisms are designed to inject environmental considerations “in the agency decisionmaking process itself,” and to “help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment.” *Pub. Citizen*, 541 U.S. at 768-69 (emphasis added) (quoting 40 C.F.R. § 1500.1(c)). Therefore, “NEPA’s core focus [is] on improving agency decisionmaking,” *Pub. Citizen*, 541 U.S. at 769 n.2, and specifically on ensuring that agencies take a “hard look” at potential environmental impacts and environmentally enhancing alternatives “as part of the agency’s process of deciding whether to pursue a particular federal action.” *Baltimore Gas and Elec. Co. v. Natural Res. Def. Council*, 462 U.S. 87, 100 (1983). The alternatives analysis “is the heart” of the NEPA process. 40 C.F.R. § 1502.14. NEPA’s implementing regulations require that the decisionmaking agency “present the environmental impacts of the proposal and the alternatives

in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.” *Id.* Importantly, the NEPA process “shall serve as the means of assessing the environmental impact of proposed agency actions, *rather than justifying decisions already made.*” 40 C.F.R. § 1502.2(g) (emphasis added); *see also id.* § 1502.5 (requiring that NEPA review “shall be prepared early enough *so that it can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made*”) (emphasis added), *Forest Guardians v. U.S. Fish and Wildlife*, 611 F.3d 692, 712 (10th Cir. 2010) (However, “the comprehensive ‘hard look’ mandated by Congress and required by [NEPA] must be timely, and it must be taken objectively and in good faith, not as an exercise in form over substance, and not as a subterfuge designed to rationalize a decision already made.” *Metcalf v. Daley*, 214 F.3d 1135, 1141-42 (9th Cir. 2000)).

B. Wild Free-Roaming Horses and Burros Act

In 1971, Congress enacted the Wild Free-Roaming Horses and Burros Act (“WHA”) out of concern that wild horses were “disappearing from the American scene.” 16 U.S.C. § 1331. Declaring that “wild horses are living symbols of the historic and pioneer spirit of the West,” and “contribute to the diversity of life forms within the Nation and enrich the lives of the American people,” Congress directed that wild horses “shall be protected from capture, branding, harassment, [and] death” and “be considered in the area where presently found, as an integral part of the natural system of the public lands.” *Id.* To implement that mandate, Congress declared that USFS shall “protect and manage wild free-roaming horses and burros as components of the public lands,” and provided that “[a]ll management activities shall be at the minimal feasible level.” 16 U.S.C. § 1333(a).

II. FACTUAL BACKGROUND

On March 23, 2021 the USFS released the *Heber Wild Horse Territory Plan* for public comment. This EA’s management plan for the WHT includes analysis of two alternatives:

- Alternative 1: Proposed Action – Appropriate Management Level, Population Control Techniques, Adaptive Management, and Criteria for Best Management Practices
- Alternative 2: No Action.

AWHC and SRWHMG provided comments during the scoping period, incorporated by reference and attached at Attachments 1 and 2. Additionally, both SRWHMG and AWHC applied, and were interviewed, for the Heber wild horse collaborative meetings that took place in 2018, but both groups were denied participation. We believe our expertise in actively studying and managing wild horses humanely in the field, as well as the input of our collective one million members and followers, should have been considered long before this comment period. Our position is that there are better ways to manage wild horses, ways that are far less expensive and more humane than removals. Our humane management proposals are also strongly supported by the public, Arizona legislators, and the Governor of Arizona.

III. DISCUSSION

A. The USFS Must Adequately Analyze Impacts of the Proposed Action

1. Fertility Control Vaccines

a. *Implement the exclusive use of the PZP vaccine.*

The Groups support the USFS's consideration of PZP to manage wild horses in the WHT. Instead of implementing a proposed action that focuses on roundups and removals, the Groups argue that the USFS must humanely manage wild horses through a focus on the application of PZP. Thus, the focus of USFS's proposed action must pivot to implementing a vigorous PZP program at current population levels, darting mares in the field through documentation or utilizing Catch Treat and Release ("CTR") methods, for the vaccination of all mares over 11 months of age with the PZP-22 or native PZP fertility control vaccine. This approach would reduce population growth rates and population numbers over time, maintain herd social structures, and ultimately save taxpayers' money. It is also consistent with the USFS's legal requirement under the WHA to manage wild horse herds at the minimal feasible level.

The use of PZP fertility control is scientifically established, cost-effective, and widely accepted in the mainstream wild horse advocacy and scientific communities. See "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward," National Academy of Sciences, p. 99-112, June 2013 ("NAS Report"). Thus, the USFS must analyze PZP in line with the National Academy of Sciences ("NAS") findings that:

Removals are likely to keep the population at a size that maximizes population growth rate, which in turn maximizes the number of animals that must be removed and processed through holding facilities.

and

The most promising fertility-control methods for application to free-ranging horses or burros are [] PZP vaccines, GonaCon™ vaccine [for females] and chemical vasectomy [for males].

This conclusion is based on criteria such as delivery method, availability, efficacy, duration of effect, and potential for side effects. Of the recommended fertility control alternatives, the NAS concluded that the only method available for use now, without further research, is the PZP birth control vaccine. (NAS Report, pgs. 81 and 6).

Ongoing research supports the warning in the 2013 NAS report that the continuing practice of roundup and removals is "expensive and unproductive." By using PZP fertility control, and reducing and eventually eliminating removals, the cost savings for USFS will be substantial. So, the USFS must also analyze and explain why the agency has failed to utilize PZP in a manner and at a level that will impact population rates in the WHT.

Ultimately, the use of PZP within the WHT is the most economical and humane option for the USFS. This approach will also preserve the natural behaviors that distinguish wild-free roaming

horses from domestic horses and stabilize populations within the WHT. Thus, it should not only be used after removals, but the USFS should start implementing PZP immediately and before any removals take place in the WHT.

b. Reject the use of GonaCon as a fertility control vaccine.

The Groups ask that any and all birth control that is not native PZP be eliminated from consideration, including the use of GonaCon in the Heber Territory. Currently, GonaCon is an experimental fertility control vaccine that interferes with the production of reproductive hormones, which drive natural behaviors in wild horses. Before the agency moves forward with this method the Groups ask that the USFS add to its analysis and state that not much is known about the long-term safety, efficacy, and impacts to wild horse behaviors and natural social behaviors, which are the differentiating factors for these federally protected animals.

In fact, the peer-reviewed article on the ongoing GonaCon study in the Theodore Roosevelt National Park, emphasizes that research on the use of GonaCon as a form of fertility control for wild horses is in its *nascent* stage and therefore limited. The study was only conducted on a handful of mares and even so it showed that the mares still acted like cycling mares – further demonstrating that more research on the effects to wild and free-roaming behaviors of the mares is necessary before this vaccine would be appropriate for broad use as a management tool. Of note, records AWHC received via a Freedom of Information Act request showed that the Bureau of Land Management’s (“BLM”) Research Coordinator, Paul Griffin, reported that the use of GonaCon in the Park was showing “less than favorable results...when compared with hand injection” and that the reasons “were unknown;” further securing how little is actually definitively known about GonaCon. (Attachment 3).

The NAS specifically noted that:

Preserving natural behaviors is important, so GonaCon **seems** [emphasis] more appropriate for use in females in that some research has **suggested** [emphasis] that female sexual behavior continues. However, further studies on behavioral effects of this product are needed. (NAS Report, p.7).

It is clear that the NAS thought GonaCon required further study. This experimental fertility control drug is not currently appropriate for widespread implementation as a management tool and should be dropped from consideration. AWHC has addressed this issue previously in a September 2015 letter to the BLM regarding the use of GonaCon in the “Water Canyon” project in the Antelope Herd Management Area (“HMA”) in Nevada. We incorporate by reference all the information contained in that letter, which is included at Attachment 4.

In short, because published research on GonaCon in horses is limited, there are remaining questions regarding negative impacts to pregnant mares (including association with abortion when given in early stages of pregnancy), long-term physiological effects, and whether the vaccine is a permanent sterilant or reversible. Even the short-term social and behavioral effects are not yet established. Thus, this experimental fertility control drug is not appropriate for field use and should be removed from consideration in this proposed analysis.

2. IUDs

The inclusion of IUDs in the proposed alternative is also experimental and therefore the impacts cannot be properly analyzed in the EA because they are unknown. In fact, the USFS has never implemented IUDs in wild, free-roaming horses before. Further, even the BLM has only implemented IUDs to control fertility of wild horses on the range in *one* HMA, the Swasey HMA in Utah. However, the agency has not released any information about the IUDs implementation, complications, or success in this HMA. Instead, the agency relied on unpublished studies conducted under far different conditions than on range management in order to wrongly justify its approach. Given this, AWHC is concerned that the USFS is following in BLM's footsteps and proposing IUDs for the purpose of some sort of research experiment on wild horses rather than an established management program that will safely, humanely, and effectively control their population in the WHT.

The USFS and BLM have yet to conduct a research project on wild horses in order to study and determine what impacts IUDs will have on wild horse health and behavior. In the Heber WHT, the agency cannot gather scientific information on these untested methods in the absence of an affiliation with an academic institution, a scientifically sound and approved research protocol, and approval from an Institutional Animal Care and Use Committee ("IACUC"). Additionally, the USFS must disclose and identify any IACUC it works with in the WHT.

Therefore, if the USFS were to implement IUDs in the WHT it would be as an experiment. Thus, the USFS must remove the use of IUDs from the chosen action or follow the guidance of the federal Office of Research Integrity which states

An institutional animal care and use committee (IACUC) is required by federal regulations for most institutions that use animals in research, teaching, and testing. The IACUC must approve protocols utilizing animals to ensure that the "animals selected for a procedure should be of an appropriate species and quality and the minimum number required to obtain valid research results.

The IACUC must also ensure the "proper use of animals, including the avoidance or minimization of discomfort, distress, and pain when consistent with sound scientific practices." Because the EA proposes to implement IUDs even though the management method has not yet been studied in wild horses, there is a strong likelihood that an IACUC could impose changes to the proposed action. At the very least, when the USFS abandons this management decision and instead pursues a study, an IACUC will insist on clearly articulated protocols for the implementation and study of IUDs in wild mares of the WHT.

Until USFS acknowledges that by utilizing IUDs the proposed action is simply a thinly disguised, and poorly composed, research experiment, takes action to implement an experiment only as part of a well-designed, rigorously-controlled and documented scientific study conducted in conjunction with a reputable scientific institution, and then receives IACUC approval from that institution, it cannot accurately describe the proposed action or analyze its true impacts.

Finally, on July 13, 2020, AWHC sent BLM a letter explaining its concerns with the BLM's push to implement IUDs in various HMAs across the West. In short, the letter explained the

various issues with the BLM's intentions and requested that the BLM revise its plans in recent and pending NEPA actions to reflect the lack of scientific data on the use of IUDs and their unknown impacts on wild horses, as well as questions raised about those impacts. Further, AWHC asked that any use of IUDs that takes place on wild horse herds under the BLM's jurisdiction be implemented only as part of a well-designed, rigorously-controlled and documented scientific study conducted in conjunction with a reputable scientific organization or institution. This letter is incorporated by reference and attached at Attachment 5 for its relevance to this USFS proposed action.

For all of these reasons, the implementation of IUDs as a management tool must be dropped from consideration for implementation in the WHT. However, if the USFS chooses to move forward with the implementation of IUDs as a management tool in the WHT, then the agency must develop clear, precise, and humane protocols. Without clear protocols for use, neither the agency nor the public can begin to properly analyze and consider the use of IUDs on the wild mares in the WHT, and without these additions, the EA is considered incomplete.

3. Mass Roundup and Removal to Such a Low AML

For scientific, economic and social reasons, this plan to reduce the wild horse population in the WHT to such a low AML of 50-104 wild horses should be eliminated from consideration. Achieving this AML would result in the removal of hundreds of wild horses, a remaining density of one horse on roughly every 394 acres at low AML and reduce the population to an unnaturally low population size that the NAS warned maximizes population growth rate. (NAS Report). As such, if this roundup option is retained in the final EA, it is essential the USFS, at minimum, further analyze the following:

- Impacts of drastic reduction of population size on population growth rate;
- Impacts of drastic population reduction on genetic health of the populations within the WHT (beyond, and in addition to, the now dated 2012 work of Cothran);
- Direct impacts of helicopter drive trapping to the environment and the horses when/if used; and
- Economic and welfare concerns related to increasing the off-range holding population of wild horses.

In short, if the USFS receives authorization to move forward with the roundup and removal of more wild horses in this action, the agency must justify how that decision is in line with the requirements of the WHA that the USFS to manage wild horses at the minimum feasible level when it's clear that the proposed action will continue the business-as-usual approach of "management" by removal and stockpiling more wild horses in off-range holding facilities.

4. Economic and Social Impacts

According to the Council on Environmental Quality, under NEPA, "agencies are required to determine if their proposed actions have significant environmental effects and to consider the environmental and related social and economic effects of their proposed actions." The USFS and

BLM are facing an escalating fiscal crisis off-the-range as a result of the mass removal of wild horses from the range and the stockpiling of captured mustangs in government holding facilities. The proposed roundup and removal will add wild horses to taxpayer-funded holding facilities. Instead, a comprehensive field-darting fertility control program will save the agency, and taxpayers, money while managing the horses humanely.

For example, AWHC operates the largest humane management program for wild horses in the world by managing 3,000 mustangs on 300,000 acres of land in a cooperative with the state of Nevada. With a team of two dozen volunteers and a budget of \$182,000, the program vaccinated more wild mares with fertility control than either the USFS or the BLM did with their multi-million-dollar program budgets. Fertility control is feasible and will work to stop population growth if used appropriately. It is also extremely cost-effective compared to roundups, removals and stockpiling. In the first year of the program, AWHC darted 958 mares¹ with PZP fertility control and as such prevented the birth of an estimated 690 new foals.² If those 690 foals had been born, the USFS's cost to round them up would have been approximately \$690,000. Then, the lifetime holding costs for those 690 horses would have been approximately \$34,500,000. Thus, it is clear that a field darting program can lead to substantial savings. In this case, the savings equates to roughly \$35,200,000.

Further, in Arizona, the SRWHMG operates a similar fertility control program on the Salt River wild horses who live on the Tonto National Forest. Under contract with the AZDA, SRWHMG has darted over 750 treatments in the field without capture, on 220 mares. In 2019, before PZP, the Salt River wild horses had 109 foals. In 2020, the first year of results, the horses had just 16 foals. This year, 2021, the herd has had just one foal born so far and fewer than 5 are expected for the entire year. Importantly, the foals born in 2020 were out of mares who did not receive their primer and booster in time before they birthed the previous year's foal. *Every mare* that did receive the primer and booster in time *did not conceive* the following year. **This is an unprecedented 100% efficacy rate of PZP.** Importantly, this program is carried out by SRWHMG at no cost to the AZDA or Forest Service. The enormous success of this program also recently drew media attention and carries continuous huge public support. Governor Doug Ducey even mentioned the cost savings and humane management of the Salt River wild horses as one of his greatest accomplishments of 2017. The Arizona public loves and cherishes their wild horses. The Heber Territory is the last territory left in Arizona managed by the Forest Service and as such the Forest Service should take the responsibility for actual humane and sustainable management seriously.

The EA must consider the social preference of American taxpayers, 80 percent of whom want wild horses protected and managed humanely on public lands. (Attachment 6). In fact, there is currently interest among members of Congress to require that humane, fertility control vaccine programs be implemented in areas across the West. Thus, the option to implement vaccine-based

¹ Program progress from April 9, 2019 confirms a total of 1048 individual mares have been darted with the PZP vaccine, with 888 mares given a primer and 1,035 mares receiving a booster dose. Total PZP treatments for Virginia Range equal 1,923 administered doses.

<https://americanwildhorsecampaign.org/media/virginia-range-fertility-control-program-monthly-reports>

² 80 percent of the 958 mares estimated to be breeding age (excluding yearlings); 90 percent vaccine efficacy.

fertility control before, and perhaps in place of a roundup and removal action, is not only cost-effective but also in line with the wishes of the majority of American taxpayers and many members of Congress.

In sum, in this EA USFS should evaluate, in specific terms, how a proposed plan of utilizing a darting fertility control program in the WHT will not only successfully manage wild horse population numbers without perpetual roundups, which are costly to American taxpayers and the horses themselves, but will also decrease unnecessary and wasteful spending of taxpayer funds.

B. The USFS Must Adequately Analyze Alternatives

An agency's duty to consider alternatives to the proposed action has been described as the "heart" of the NEPA process. 40 C.F.R. § 1502.14. Agencies are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4332(E); *see also* 42 U.S.C. § 4332(C)(iii). An EIS must "provide full and fair discussion of significant environmental impacts and . . . inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 387 F.3d 989, 993 (9th Cir. 2004) (citing 40 C.F.R. § 1502.1). It is essential that an EIS contain "detailed and careful" analysis of the relative merits and demerits of the proposed action and proposed alternatives, a requirement which courts have characterized as the "linchpin" of an EIS. *Natural Resources Defense Council, Inc. v. Callaway*, 524 F.2d 79, 92 (2d Cir. 1975) (quoting *Monroe Cnty Conservation Soc'y, Inc. v. Volpe*, 472 F.2d 693, 697-98 (2d Cir. 1972)).

"The purpose of NEPA's alternatives requirement is to ensure agencies do not undertake projects "without intense consideration of other more ecologically sound courses of action, including shelving the entire project, or of accomplishing the same result by entirely different means." *Env'tl. Defense Fund, Inc. v. U.S. Army Corps of Engrs.*, 492 F.2d 1123, 1135 (5th Cir. 1974). That analysis must identify multiple viable alternatives, so that an agency can make "a real, informed choice" from the spectrum of reasonable options. *Friends of Yosemite Valley v. Kempthorne*, 520 F.3d 1024, 1039 (9th Cir. 2008).

Federal courts have consistently held that an agency's failure to consider a reasonable alternative is fatal to an agency's NEPA analysis. *See, e.g., Muckleshoot Indian Tribe v. U.S. Forest Serv.*, 177 F.3d 800, 814 (9th Cir. 1999) ("A 'viable but unexamined alternative renders [the] environmental impact statement inadequate.'") (quoting *Citizens for a Better Henderson v. Hodel*, 768 F.2d 1051, 1057 (9th Cir. 1985)); *Idaho Conserv. League v. Mumma*, 956 F.2d 1508, 1519-20 (9th Cir. 1992) ("The existence of a viable, but unexamined alternative renders an environmental impact statement inadequate."). If the action agency rejects an alternative from consideration, it must explain why a particular option is not feasible and was therefore eliminated from further consideration. 40 C.F.R. § 1502.14(a). The courts will scrutinize this explanation to ensure that the reasons given are adequately supported by the record. *See Muckleshoot Indian Tribe*, 177 F.3d at 813-15; *Idaho Conserv. League v. Mumma*, 956 F.2d 1508, 1522 (9th Cir. 1992) (while agencies can use criteria to determine which options to fully evaluate, those criteria are subject to judicial review), *Citizens for a Better Henderson*, 768 F.2d at 1057.

In order to comply with NEPA, the USFS should continue to consider the following alternatives:

1. **Bait and Water Traps Without Helicopters**

While the Groups appreciate that the USFS has made an effort to prioritize bait trapping methods of removal, we ask that the EA further analyze the *exclusive* use of bait and water trapping. In the case where this option is used exclusively, it is an important management tool to consider given the sensitive and unique habitat of Forest Service lands. Thus, the USFS must, at the very least, consider the exclusive use of bait and water trapping because, in addition to being a more humane practice, bait and water trapping could be significantly less stressful on the particular environment present in this WHT.

If the use of helicopter roundups is still selected as part of the management plan, the USFS must consider, analyze, and implement humane standards as noted above. (*See for example*, BLM's Standard Operating Procedures for Wild Horse Gathers.) The USFS should amend the EA to include an analysis of existing information available to determine if improvements could be made to reduce potential stress and harm to the horses during roundups. Improvements, to minimize stress and injury to horses during roundups must include the following:

1. Limit the distance horses/burros may be chased by a helicopter to no more than five (5) miles;
2. Require that the helicopter *not* chase/move horses at a pace that exceeds the natural rate of movement of the *slowest* animal in the band. Every effort should be made to keep older, sick and young animals together with their bands as they are moved into the trap. If there are compromised, old, weak or young animals in a small band – the helicopter should not move or capture those animals; and
3. Establish strict parameters for suspending helicopter roundup operations in temperatures below freezing (32 degrees F) or over 90 degrees F.

Helicopter roundups are known to inflict stress, trauma, injury and death on wild horses and collateral damage to sensitive sagebrush, grasslands, and riparian habitat areas and disruption to other wildlife species. Bait and water trapping will minimize stress to the horses, eliminate collateral environmental damage (as horses will not be stampeded through sensitive habitat), and maintain herd social structures. The USFS must analyze how a similar application of bait and water trapping use could be applied in this WHT.

As the USFS is aware, the use of bait and water trapping can be used to greatly reduce the stress of roundup operations and maintain the social structure of bands, thereby reducing stress to the animals and is a minimal feasible management.

2. **Adjustments to Livestock Stocking Rates and AML**

The USFS has a statutory mandate to protect wild horses, while livestock grazing is permitted only as a discretion. Federal regulation 43 CFR §4710.5 “Closure to livestock grazing” authorizes the USFS to “close appropriate areas of the public lands to grazing use by all or a particular kind of

livestock” “[i]f necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury.” Livestock grazing is not required to fulfill the agency’s “multiple use” mandate.

Therefore, the USFS should pursue analysis of an alternative that considers how the agency could accommodate a larger wild horse population through adjustments to livestock stocking rates with options such as voluntary grazing retirement opportunities. Such options should be explored with permittees in order to determine an equitable means to achieve a fairer allocation of resources for wild horses on USFS public lands.

According to Table 12, and taking into account percentage overlap of the allotments with the WHT, there is roughly the equivalent of 43 cow/calf pairs utilizing the WHT in both allotments. Specifically, since the most recent allotment management plan for the Black Canyon allotment was implemented in 1998, it is due for review. When the Black Canyon allotment is reviewed, given that the EA notes the land is in better condition than it was in 1998, the USFS should revise the boundary to exclude the 60% overlap with the WHT. At the current 300 allotted AUMs, or 25 cow/calf pairs, only 15 pairs would have accounted for use of the WHT to begin with. Now, with the allotment in better condition, the USFS should adjust the boundary and consider the current stocking rate for use exclusively outside of the WHT boundary. Additionally, the EA notes that Livestock grazing on the Heber allotment is currently undergoing site-specific environmental analysis. The USFS should also consider the elimination of the 6% overlap of that allotment with the WHT. At 5,430 currently allotted AUMs, or 453 cow/calf pairs, even with this small boundary adjustment the allotment would still stock 426 pairs. Together, by adjusting the boundaries of both allotments, the total AUMs re-allocated from livestock use would equal 506 AUMs and leave the majority, or 5,225 AUMs, for livestock exclusively and outside of the WHT. Those 506 re-allocated AUMs could allow for an additional 42 wild horses within the WHT or could be spread between wild horses and wildlife at a 60:40 ratio, allowing for 26 additional horses and the remaining AUMs for wildlife of various species.

In short, to the extent that the USFS unjustly blames damage in the WHT on the wild horses, it is simply logical for the cow/calf pairs who graze in the WHT to be greatly reduced in number, or otherwise eliminated from the WHT. Nothing precludes the USFS from adjusting these levels to accommodate the current wild horse population inside the WHT, or at least re-allocating AUMs as described above. The final EA should fully analyze this alternative, including the cost benefits of offering permittees compensation for reduced use or non-use of AUMs. In combination with PZP, this would be far more cost-effective than removing wild horses from this WHT and warehousing them in holding facilities. In addition, the EA must provide data to explain why a reduction of livestock grazing could not fulfill the same objectives outlined for the removal of horses.

With holding facilities full and the costs for every horse removed totaling nearly \$50,000 by the BLM’s own estimate (where USFS sends many of their removed wild horses and burros). Thus, adjusting grazing is a viable and cost-effective alternative that must not be dismissed. The cost-savings realized by reductions in heavily subsidized livestock grazing make this alternative even more desirable.

The EA fails to consider an alternative that would allow livestock grazing while compensating permittees for non-use in order to provide the agency time to address the necessary land use planning process for wild horses by giving wild horses a fairer share of AUMs in the WHT. It is unreasonable – and frankly poor policy – for the USFS to continue to allocate AUMs for livestock use in WHTs while the USFS removes wild horses toward unreasonably low AMLs. The USFS must demonstrate (providing empirical data in the EA for the proposed action) that the removal of wild horses, over cattle, is necessary to maintain or achieve a true thriving natural ecological balance.

C. The USFS Must Consider Reasonably Foreseeable Actions

1. Study of Population Management Tools

As explained above, the Groups’ position is that the USFS must first proceed with a study of IUDs before it can proceed to potentially using this tool as a management option for wild mares. Thus, it is reasonably foreseeable that the agency will develop study protocols, partner with an accredited institution, and receive IACUC approval for an IUD study, perhaps in the WHT. As such, analysis of a reasonably foreseeable IUD study is necessary in the final EA to ensure that the management plan preserves humane wild horse management in the WHT.

2. Range Improvements

The USFS must analyze how the implementation of any future range improvements, such as the development of additional water sources and addition or removal of fencing to maintain or amend the WHT boundary could affect the management of wild horses in the WHT. Such impacts could be negative or positive, such as limiting the intermixing of USFS and reservation horses within the WHT. The analysis must include a map that shows the boundaries, livestock allotments, horse distribution (census map), water sources and fencing (including planned fencing). Thus, analysis of reasonably foreseeable range improvements and their impacts on wild horses is necessary in the final EA to ensure that the management plan preserves wild horse use in the WHT.

D. The EA Must Disclose Necessary Information

In order for the public to meaningfully provide public comment on the proposed action, the USFS must disclose the following information for the planning area.

1. Add a description for “outside the Territory”

The current description in the EA for “outside the Territory” is too broad. USFS must further define this phrase in the final EA because the Apache Sitgreaves National Forest has many small pockets of wild horse populations from Forest Lakes to Show Low. Under the current understanding of this phrase from the draft EA, it is unclear what areas are included. The Groups would like to know, and have further defined, the following in the final EA:

- Where the pockets of wild horse populations “outside the Territory” are in relation to the Territory boundary;
- Where the bait trapping operations will be concentrated; and

- If the USFS plans to remove all wild horses still considered “outside the Territory.”

2. Information about the Shootings

The Heber wild horses have been the subjects of ongoing shootings. In the final EA, the USFS must describe for the public how it plans to monitor the forest in order to prevent further shootings of the Heber wild horses. To date, 28 wild horses have been confirmed shot and killed by a shooter, but more than that have been found dead. As the USFS is aware, there are many desolate areas of the forest, making it difficult to accurately account for the actual number of wild horses this shooter has killed. Thus, if the USFS proceeds with a low AML of 50 wild horses, the agency must explain in the final EA how it plans to prevent the shooter completely decimating the herd in the future. Finally, this EA is the perfect opportunity for the USFS to update the public about any prosecution of the subject.

IV. CONCLUSION

For the reasons explained above, the draft EA for the USFS’s management plan is currently insufficient and flawed. The Groups believe that the above information and analysis is the minimum required to satisfy NEPA and the WHA. We hope that the USFS will seriously consider the foregoing comments when preparing the final EA for yet another planned wild horse roundup in Arizona

The Groups, and the attached names of 10,768 concerned citizens (Attachment 7), expect that the USFS will provide the level of detail described and requested above, which is necessary for the agency’s informed decision-making. The above-mentioned concerns, data and information must be fully analyzed in the final EA and adequately considered by the USFS.

Thank you for your consideration.

Sincerely,

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Attachments:

Attachment 1: AWHC's Scoping Comments

Attachment 2: SRWHMG's Scoping Comments

Attachment 3: BLM Email Noting Paul Griffin's Report on GonaCon in North Dakota

Attachment 4: AWHC's Water Canyon Letter to BLM on GonaCon

Attachment 5: AWHC's July 13, 2020 Letter to BLM on IUDs

Attachment 6: Public Poll

Attachment 7: Petition Signatures



March 16, 2020

Black Mesa Ranger District
Attn: Heber Wild Horse Territory
PO Box 640
Springerville, AZ 85938

Submitted via CARA

To whom it may concern:

These comments on the *Heber Wild Horse Territory Plan*, (#18916), are submitted on behalf of the American Wild Horse Campaign (“AWHC”).

AWHC is a national nonprofit organization dedicated to preserving the American wild horse in viable free-roaming herds for generations to come, as part of our national heritage. Our grassroots efforts are supported by a coalition of over 60 historic preservation, conservation, horse advocacy and animal welfare organizations.

I. OVERVIEW

AWHC strongly opposes the use of surgical sterilization techniques on either stallions or mares, mass roundups and removals, and the use of the still experimental GonaCon vaccine in the Heber Wild Horse Territory (“Heber Territory”). Additionally, AWHC opposes the use of roundup and removal of wild horses because it only fuels higher reproduction rates for horses left on the range. As the 2013 National Academy of Sciences (“NAS”) report has found “[r]emovals are likely to keep the population at a size that maximizes population growth rate, which in turn maximizes the number of animals that must be removed and processed through holding facilities.” (Attachment 1, p. 94).

The plan to use GonaCon and surgical sterilization methods to control populations is experimental in nature and not supported by science. NAS recommended against most of these options, stating that more research was needed before such strategies could be utilized in the field because of their impacts on natural behavior and social organization. Research has not yet accurately determined the effects of any of these proposed management tools on natural wild horse behavior.

Of note, AWHC has filed litigation around the Bureau of Land Management’s (“BLM”) continued proposals to experiment on wild mares in Oregon using the surgical sterilization technique, ovariectomy via colpotomy. In 2015 the BLM initially proposed the experiments, and AWHC, and coalition partners, filed suit challenging BLM’s restrictions on public

observation and sought a preliminary injunction to protect their rights under the First Amendment to the Constitution. Rather than responding to that lawsuit or allowing for any public observation, BLM simply abandoned the proposed experiments. Then in 2018, BLM again proposed to undertake experiments with ovariectomy via colpotomy. AWHC again filed suit to protect their constitutional rights and sought a preliminary injunction to prevent the experiments from going forward before the claims could be adjudicated. The District of Oregon granted the requested preliminary injunction at a hearing on November 2, 2018. The BLM then withdrew the proposed experiment.

AWHC has also challenged a decision by BLM to geld wild horses and release them to the range, and that challenge is currently pending before the U.S. Court of Appeals for the Ninth Circuit. *See Am. Wild Horse Campaign v. Bernhardt*, No. 18-17403. Because the Ninth Circuit's ruling regarding the degree of environmental review that must accompany a gelding decision by the BLM will likely have an extremely significant bearing on the USFS's decision regarding the proposed release of geldings in Heber Territory, AWHC strongly recommend that USFS drop any gelding portion of this analysis until the Ninth Circuit issues a ruling.

Instead of large-scale removals, and consideration of unproven fertility control methods, the USFS should manage this population on the range at the current level, using PZP fertility control to reduce population growth rates and the population size, if necessary, over time. The PZP vaccine is a scientifically proven and cost-effective approach for reducing wild horse population growth rates and numbers over time. It is widely supported by mainstream humane and wild horse protection organizations. However, the vaccine must be used on a sufficient scale to impact population growth rates. (Attachment 1, p. 99-112).

As such, and as described in more detail below, it is AWHC's position that:

- The USFS must prepare an Environmental Impact Statement ("EIS") rather than an Environmental Assessment ("EA") from this proposed analysis because at least four distinct NEPA "significance" factors are triggered, any one of which requires preparation of an EIS;
- The USFS must analyze a reasonable range of alternatives in this proposed analysis. These alternatives include (a) managing wild horses on the range with the fertility control PZP, (b) setting an Appropriate Management Level ("AML") that will give wild horses their fair share of public rangelands, and (c) accommodating current wild horse numbers with range improvements and reduction or elimination of livestock grazing.
- The USFS must take the requisite "hard look" at the environmental impacts of its action, which will result in short-term and long-term effects to federally-protected wild horses left on the range, the family bands of wild horses that reside in these areas, the genetic diversity of these wild horse populations, and the potential measures that could mitigate the impacts resulting from the USFS's action.
- The USFS must analyze economic and social impacts in this proposed analysis. The USFS's decision to roundup and permanently remove wild horses from this area vs. the more cost-effective options of reducing livestock grazing and managing herds on the

range with PZP fertility control is irresponsible. Additionally, the proposed analysis must not ignore the social impacts at a time when most Americans support protecting wild horses on our public lands and oppose horse slaughter, while a small minority want our public lands used for livestock grazing. (Attachment 2).

The USFS must reject the use of surgical sterilization and GonaCon because of their documented negative impacts and/or lack of research on their use in wild horses and because such use without further research goes against the recommendations of the NAS. However, AWHC notes that efforts such as retrofitting cattleguards with “Wild Horse Annie” safety features must remain in the management plan to ensure that the Heber wild horses have a safe habitat.

For these reasons—as further articulated below—AWHC strongly urge the USFS to prepare an EIS and to engage in a meaningful analysis of the reasonable alternatives to, and impacts of, the permanent removal of wild horses from the range as well as the use of surgical sterilization and GonaCon to reach and maintain AML in the Heber Wild Horse Territory.

II. DISCUSSION

A. An Environmental Impact Statement is Required

The USFS must prepare an EIS for this proposed analysis due to the breadth and scope of the project. The proposed action will span years and impact 19,700 acres of land with the conduct of multiple roundups, removals, and other inhumane management practices of wild horses. Thus, USFS’s decision to prepare an EA here, in lieu of an EIS, is contrary to the National Environmental Policy Act (“NEPA”) and its implementing regulations.

Indeed, several of the NEPA “significance” factors are triggered by the proposed action, although the presence of only one significance factor *requires* preparation of an EIS. *See Pub. Citizen v. Dept. of Transp.*, 316 F.3d 1002, 1023 (9th Cir. 2003) (“If the agency’s action is environmentally ‘significant’ according to any of these criteria [set forth in 40 C.F.R. 1508.27], then DOT erred in failing to prepare an EIS.”); *Humane Soc’y of the U.S. v. Johanns*, 520 F. Supp. 2d 8, 20 (D.D.C. 2007) (explaining that “courts have found that the presence of one or more of [the CEQ significance] factors should result in an agency decision to prepare an EIS”) (citations omitted); *Fund For Animals v. Norton*, 281 F. Supp. 2d 209, 218 (D.D.C. 2003) (same).

The following significant factors are triggered here. Accordingly, the USFS is required to prepare an EIS on this extreme proposed analysis.

- **40 C.F.R. § 1508.27(b)(4)** – This factor addresses “[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial.”

“Controversy in this context does not mean opposition to a project, but rather a substantial dispute as to the size, nature, or effect of the action.” *Hillsdale Environmental Loss Prevention, Inc. v. U.S. Army Corps of Engineers*, 702 F.3d 1156, 1181 (10th Cir. 2012). The

USFS cannot credibly assert that the proposed analysis will not be controversial for several reasons. Significant scientific controversy over the proposed analysis already exists, as many of its components are contrary to the findings of the NAS in its 2013 report (Attachment 1). These include:

- Setting an AML that is not “transparent to stakeholders, supported by scientific information or amenable to adaption with new information and environmental and social change.”
- Continuing management practices that are “facilitating high rates of population growth on the range” by continually rounding up and removing large numbers of wild horses from the Territory.
- The impacts of the proposed sterilization methods on natural behaviors. The percentage of the herd that will be subjected to sterilization is a determination that will have significant bearing on the effects of sterilization on the behavior of the herds in the Territory.
- USFS’s proposal to undertake dangerous and inhumane sterilization mechanisms entails highly uncertain or unknown risks, including unknown effects on sterilized individuals (such as the mortality rate associated with the sterilization of mares or the rate at which the sterilization of mares may result in abortion of foals) as well as unknown effects on herds (including whether sterilized horses will engage in natural, free-roaming behaviors or instead concentrate in larger numbers in smaller areas, and whether herds containing sterilized members will engage in natural behaviors).
- GonaCon research in horses is extremely limited, and as such there are important remaining questions regarding negative impacts to pregnant mares (association with abortion when given in early stages of pregnancy), long-term physiological effects, and whether the vaccine is a permanent sterilant or reversible. Even the short-term social/behavior effects are not yet established.

Being as the dispute under “controversy” also applies to the “size, nature, and effect of the action,” USFS should note the extensive controversy surrounding the nature of the proposed action. Review of social acceptability as an important factor shows tens of thousands of public comments in opposition to surgical sterilization, a letter from over 80 veterinarians in opposition to the ovariectomy via colpotomy procedure (Attachment 3), and letters from members of the House and Senate opposing the surgical sterilization of mares and encouraging the agency to select a more humane and less scientifically controversial form of fertility control. (Attachments 4 and 5). Social acceptability is a factor that the USFS cannot ignore when considering the breadth and scope of controversy that surrounds some of the proposed elements in this analysis. The EIS process contains more rigorous requirements for public participation and for the disclosure and consideration of reasonable opposing viewpoints. Accordingly, an EIS would be a far better mechanism for the agency to use to consider the vigorous public debate over the proposed mechanisms for managing wild horse populations.

In sum, there is much scientific controversy that already surrounds the proposed analysis. The USFS cannot ignore the findings of the National Academy of Sciences 2013 report, which the agency itself commissioned and funded. These proposed management tools are unprecedented, untested, and highly controversial – both scientifically and socially.

- **40 C.F.R. § 1508.27(b)(5)** – This factor addresses “[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.”

With this proposed analysis, the USFS is considering several new approaches that are controversial and untested. This level of uncertainty and unknown risk is demonstrated by the proposal to consider surgical sterilization and the use of the unproven vaccine, GonaCon. Not much is known about the long-term safety, efficacy, and impacts to wild horse behaviors and natural social behaviors when GonaCon is used. Therefore, the use of GonaCon has highly uncertain or unknown impacts.

- **40 C.F.R. § 1508.27(b)(6)** – This factor addresses “[t]he degree to which the action may establish a precedent for future Action with significant effects or represents a decision in principle about a future consideration.”

With this proposed analysis, the USFS is adopting new approaches that could set precedent for how future actions proceed (whether or not they are subject to separate NEPA review) in numerous regards:

- USFS has never rigorously evaluated the impacts of releasing geldings onto the range. As such, the plan to release geldings in this context risks setting the precedent that USFS may release geldings even though it has no clear understanding of the impacts of this decision.
- Reducing the number of wild free-roaming, reproductively intact horses and the management of that population has never before been done in a Wild Horse Territory, there is no research regarding the impacts of the plan to maintain a portion of the wild horse population as non-reproducing, and the action will set a precedent for the management of wild horses in all areas of the West.
- The USFS has never before performed surgical sterilization procedures on mares either in the wild as a management tool or in holding facilities. There is not nearly enough research to support the use of surgical sterilization on mares as a management tool. This untested action could set precedent for the management of wild horses in all areas of the West.
- The potential use of GonaCon as a management tool in a USFS herd being implemented before research documenting its behavioral effects is completed could set a precedent for the management of wild horses in all areas of the West.

Besides being counter to scientific recommendations, these decisions, individually and combined, could set dangerous precedents for management of federally-protected horses across the West.

- **40 C.F.R. § 1508.27(b)(10)** – This factor is triggered if “the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.”

AWHC and its coalition partners have previously sued the BLM over plans to sterilize wild free-roaming horses, maintaining that such action violates the Wild Free-Roaming Horses and Burros Act. In the face of some of these lawsuits, BLM has cancelled plans to geld wild stallions and spay wild mares in the White Mountain HMA in Wyoming and to geld wild stallions in the Pancake HMA in Nevada. In the latter case, U.S. District Court Judge Beryl A. Howell (Attachment 6) warned the BLM that it “may not simply remain studiously ignorant of material scientific evidence well known to the agency and brought directly to its attention in timely-filed comments.” The scientific evidence that BLM attempted to ignore was in the form of expert declarations attesting to the harmful impacts of castrating wild free-roaming stallions and why such action violated the Wild Free-Roaming Horses and Burros Act.

Thus, it is in USFS’s best interest to consider scientific input that is contrary to its desired course of action, as well as seriously grapple with the extreme degree of scientific uncertainty over the impacts of sterilization on the behavior of individual wild horses and wild horse herds threatens an ongoing violation of the Wild and Free-Roaming Horses and Burros Act (“WHA”). Further, unless USFS seriously considers the input of undisputed experts on wild horses, including those convened by the NAS, it will be in violation of the WHA’s mandate that the agency must consult experts regarding any proposal to sterilize wild horses. *See* 16 U.S.C. § 1333(b)(1).

In conclusion, an EIS is required when even *one* of these factors is implicated. Because at least *four* significance factors are triggered here, it is wholly inconsistent with NEPA and its regulations for USFS to prepare only an EA. Therefore, it would be a patent NEPA violation if BLM refused to prepare an EIS. For all of these reasons, an EIS is required for this action.

B. USFS Must Adequately Analyze a Reasonable Range of Alternatives

The following alternatives must be analyzed in the proposed actions in the USFS’s environmental review of the Heber Wild Horse Territory Plan.

1. Establish a genetically sustainable population limit.

The AML is based on the number of wild horses the USFS has decided to allow to live in the Territory after allocating the lion’s share of forage to private livestock. However, as the NAS concluded:

How Appropriate Management Levels (AMLs) are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to

adaptation with new information and environmental and social change....standards for transparency, quality and equity [are needed in] establishment, adjustment, and monitoring [of AMLs]. (Attachment 1, p. 11).

The USFS should adhere to NAS recommendations for “transparency, quality and equity” in setting and implementing AML. This must include basing decisions on sound environmental and monitoring data, a complex understanding of herd dynamics and genetic viability needs, as well as equity in resource distribution in the Territory. Any NEPA analysis should also note that the AML range was established to allow the population to grow in the years between roundups and that if the population is being managed properly with PZP fertility control, then an AML range would be rendered obsolete and unnecessary.

The proposed AML of just 50-104 wild horses is not based on science, is too small to be genetically viable and could result in the permanent removal of 300 or more wild horses from the Territory. This AML is clearly based on the inequitable allocation of public forage resources to privately owned livestock. Thus, the USFS’s environmental review must analyze and designate an alternative to expand the AML to a minimum of at least 200 horses and provide a scientific rationale for the number, including full disclosure of the resource allocation between livestock and wild horses on which the AML is based.

2. Use humane fertility control to stabilize the wild horse population and reduce it humanely over time.

The USFS must consider the possibility of implementing PZP at current population levels utilizing Catch Treat and Release (“CTR”) methods for the vaccination of all mares over 1 year of age with the PZP–22 or native PZP fertility control vaccine. The use of PZP fertility control is scientifically established, cost–effective and widely accepted in the mainstream wild horse advocacy and scientific communities. (Attachment 1, p. 99-112).

The USFS must consider that if removals must occur, they should be incremental over time. The USFS must consider all information it has available about the need to keep horse herds at certain population levels in order to prevent adverse genetic harm to the population, including inbreeding.

Further, the USFS must analyze PZP in line with the NAS findings that:

Removals are likely to keep the population at a size that maximizes population growth rate, which in turn maximizes the number of animals that must be removed and processed through holding facilities.

and

The most promising fertility-control methods for application to free-ranging horses or burros are [] PZP vaccines, GonaCON™ vaccine [for females] and chemical vasectomy [for males].

This conclusion is based on criteria such as delivery method, availability, efficacy, duration of effect, and potential for side effects. Of the recommended fertility control alternatives, the NAS concluded that the only method available for use now without further research is the PZP birth control vaccine. (Attachment 1, pgs. 81 and 6).

As such, the proposed analysis must incorporate data showing that the PZP fertility control vaccination has been available for decades, has a 30-year proven history of being safe and effective in managing wild horse populations, and is supported by the vast majority of the public and an overwhelming number of animal welfare organizations. The USFS must include and analyze all current peer-reviewed literature on the use of PZP as a management tool, including its effectiveness in reducing and maintaining herd numbers, its effects on herd behaviors, its safety compared to sterilization, and the cost of its implementation compared to roundups and removals.

The USFS must also incorporate in this analysis that research also indicates that a two-shot protocol (PZP-22 followed by a native PZP booster) conveys three years or more of infertility in mares. (Attachment 1, p. 102). The use of the PZP vaccine can bring about zero population growth within 2 years and can reduce population numbers over time. The agency's analysis must include an alternative for an aggressive PZP fertility control program in the Territory and must allow for 5-10 years to achieve an AML of 200 horses.

Ultimately, the use of PZP within Heber Territory is the most economical and humane option for the USFS. It will preserve the natural behaviors that distinguish wild-free roaming horses from domestic horses and are protected under federal law and stabilize populations within the HMAs. Therefore, AWHC strongly urges the USFS to analyze the implementation of a comprehensive PZP fertility control program as an alternative in the analysis for the Heber Territory.

3. Reject use of surgical sterilization as a management tool.

a. "Spaying" Mares

AWHC asks that spaying mares be eliminated from consideration in this proposal. However, if the USFS moves forward with its analysis of this method, the agency must note that the Wild Free-Roaming Horses and Burros Act requires that wild horses and burros be managed in a manner that protects their wild and free-roaming behavior. While Section 3(b)(1) as modified by the Public Rangelands Improvement Act of 1978 does specify options for population management that include sterilization, it states that such determinations must be made in conjunction with other wildlife agencies and experts independent of government, such as those recommended by the NAS.

In its final report from June 2013 (Attachment 1), the NAS/NRC concluded that spaying was "inadvisable" and also recommended against gelding. For example, it stated

The possibility that ovariectomy may be followed by prolonged bleeding or peritoneal infection makes it inadvisable for field application." (p.130).

and

Surgical ovariectomy and ovariohysterectomy are commonly used in domestic species, such as cats and dogs (including feral cats and dogs), but seldom applied to other free-ranging species.” (p. 114).

In addition, the 2015 NRC report (Attachment 7) found:

Domestic mares are typically cross-tied (after ovariectomy via colpotomy) to keep them standing for 48 hours post-surgery to prevent evisceration through the unclosed incision in the anterior vagina. That protocol would not be possible in free-roaming mares because they cannot be held still for so long. Therefore, there is some concern that the investigator may see more fatalities after surgery than the 1% quoted in the protocol, based on domestic mares.

The NRC suggested that the less invasive sterilization techniques proposed in the last round of research “would be safer—with less risk of hemorrhage and evisceration –and probably less painful.”

As such, the USFS must consider the risks when analyzing ovariectomies, or other methods of mare sterilization, for use in the Heber Territory. Highlights of concern – and impacts that must be adequately analyzed in this proposed analysis – follow below:

- Impacts on physiology due to reduction of estrus and alteration of hormones.
- Risk of infection under conditions that may not be entirely sterile.
- Risk of sedation and restraint in wild horses.
- Risks of hemorrhage, evisceration, colic and infection due to inability to provide the required post-operative care.
- The risk of post-operative pain in these mares and the USFS’s inability to provide adequate post-operative pain relief.
- Consider the risks of the procedure when performed by veterinarians that lack training in this outdated procedure.
- The risks to pregnant mares. Including but not limited to abortion, stress, and hemorrhage.
- The risks to dependent foals when the mother undergoes the procedure and due to pain or complication may not let a foal nurse, may not produce milk, or may injure the foal when reacting to pain.
- The feasibility of the proposed procedures for use on the range, including cost, and lack of sterile environment for surgery.

The USFS must acknowledge the serious health risks that ovariectomy, and other invasive surgical sterilization techniques, represent to wild mares and the careful post-operative monitoring and care, including pain relief and restricted movement, necessitated by the

procedures when performed on wild horses. Several equine veterinarians experienced with this procedure have acknowledged and warned about the impacts of ovariectomies.

In “TheHorse.com,” Dr. Michael Ball (Attachment 8) describes the risks of ovariectomy in domestic horses:

Regardless of the method used for ovariectomy, this procedure is generally a painful one and the use of peri-operative analgesics is important. The horses often are hospitalized for 3-7 days and very carefully monitored in the immediate post-operative period for any signs of hemorrhage, which is a serious complication that can occur.

Dr. Robin Kelly, whose northern California-based equine veterinary practice includes care of 240 wild horses and burros at the Montgomery Creek Ranch sanctuary in Elk Creek, writes in a statement (Attachment 9) her concerns about the agency’s inability to provide post-operative care to wild mares who will be ovariectomized:

The postoperative management proposed for these mares is minimal compared to significant postoperative recommendations for domesticated mares. These recommendations include keeping mares tied in a tie stall/tie line to prevent them from laying down/rolling to reduce risk of postoperative hemorrhage or herniation of bowel thru that must be left open to second intention healing. These measures are advised since extensive post-operative hemorrhage or herniation of bowel through incisions would not be survivable.

....Domesticated mares would be treated with a more aggressive antibiotic choice for 7-10 days post operatively (monitoring daily for complications). Insufficient anti-microbials could result in peritonitis (also likely not survivable). . . . The wild mares will not be provided with post-surgical pain relief, according to the study description, and presumably [will be] turned out in a communal paddock with no restraint.

The proposed analysis must adequately analyze the feasibility of this invasive surgical procedure for use on wild mares in the wild. The required confinement for safe recovery from this invasive surgical procedure is not possible in free-roaming mares, raising the risk of fatality. The USFS must analyze and consider how the agency plans to provide the mares with any of the required follow-up care after this procedure, including stall confinement, a period on crossties to prevent lying down or rolling, careful monitoring for hemorrhage, pain relief and antibiotic treatment.

The proposed analysis must also consider other health risks related to ovariectomy of horses, including abortion by pregnant mares as well as premature menopause that can impact to various body functions including bone conditions.

Additionally, referring specifically to the introduction of ovariectomized mares into wild herds, Dr. Kelly states,

I am concerned about the use of this procedure in the wild, due to the concerning potential disruption of the normal social behaviors of post ovariectomized mares and how this will affect their role within the herd once they return to their families. According to the reproductive specialist I consulted, while estrogen is secreted by multiple tissues, progesterone is only produced by the ovaries. Since progesterone is the hormone that prevents mares going into estrus, ovariectomized mares frequently act like they are in heat all the time. Putting ovariectomized mares back on the range could create social havoc within wild herds. Stallions instinctively know which mares are fertile/receptive and which are not. The stallion's job is to breed and impregnate mares after they deliver. If he has a number of ovariectomized mares in his harem who act like they are in estrus continuously but cannot become pregnant, or some of the time would not accept his 'advances,' the stallion's social behaviors could be severely disrupted or "over used" inappropriately. In addition, ovariectomized mares may act sexually but may not want to breed, raising the potential for serious kick injuries to stallions and mares if a stallion attempts to breed an unreceptive mare. Ovariectomized mares may also lose their status within the mare band. 'Lead' mares would be unlikely to retain that position post-ovariectomy. Social ostracism is certainly possible for these post-operative [mares] if they are no longer accepted by the herd.

The proposed analysis must analyze the current body of research available on the effects of spaying horses and the impacts they have on horse behaviors. It is widely documented that spaying mares alters behaviors. Research shows that the primary reason domestic mares are spayed is specifically to alter behaviors. Such alteration of behaviors would be in direct violation of the WHA, which aims to protect "wild, free-roaming" horses. Indeed, methods that alter the natural, wild free-roaming behaviors – such as gelding or spaying – would violate the basic tenet and intention of the Act. The USFS analysis must include available research on this subject that outlines that ovariectomies, or spaying, may result in the elimination of estrus-associated behavior – a key behavior that governs the primary function of lead mares and others in the wild.

Dr. Allen T. Rutberg, a faculty member at the Tufts/Cummings School of Veterinary Medicine and a wildlife biologist and researcher who has extensively studied wild horse behavior, described the detrimental effects of sterilization on the natural free-roaming and social behaviors of these herds in AWHC's past comments to the agency (Attachment 10):

Wild horses typically live in reproductive bands consisting of adult mares, their dependent offspring, and one or more stallions who[se] lives revolve around trying to protect mares from harassment by other stallions and securing exclusive reproductive access to the mares for themselves; ...[m]ares, meanwhile, simultaneously bond to one another and compete with each other for access to water, food, and other resources for themselves and their foals. Neither geldings nor spayed mares participate in these fundamental processes of wild horse behavior.

Thus, spaying is not an appropriate management tool for wild horses due to the behavioral changes and social disruption it will undeniably cause when implemented on the range, as well

as the health risks this surgical procedure poses for mares and their unborn foals. This proposed analysis must adequately analyze these serious impacts to wild mares.

Ultimately, the USFS should drop plans to surgically sterilize federally-protected wild mares and focus instead on non-surgical methods of fertility control that preserve the natural behaviors that distinguish wild-free roaming horses from domestic horses.

b. “Neutering” Stallions

1. Gelding

AWHC asks that gelding of stallions be eliminated from consideration in this proposal. However, if the USFS moves forward with its analysis of this method, the agency must note the following findings that do not support gelding stallions who live on the range. The proposed analysis should include such a lengthy discussion that acknowledges and analyzes the serious risks that gelding represents to stallions. The proposed analysis must also disclose any and all castration side effects and deaths of the stallions in holding facilities.

Additionally, the analysis should note and consider the often-severe impacts of gelding on wild stallions who will be returned to the range where they will be expected to fend for themselves and live in often-harsh conditions. In fact, the impacts cannot only affect these animals’ physiology and ability to survive but also their behavior and therefore their influence on or relationship to the herd. The USFS has no proven studies or data to show that the use of castration as a management tool helps to actually stabilize wild horse populations. The NAS also advised that castration of stallions will cause loss of testosterone and consequent reduction in or complete loss of male-type behaviors necessary for maintenance of social organization, band integrity, and expression of natural behavior repertoire.”

The late Dr. Jay Kirkpatrick, founder of the Science and Conservation Center in Billings, Montana and a foremost authority on wildlife reproductive biology, focuses his comments (Attachment 11) on how gelding effects the herd:

The very essence of the wild horse, that is, what makes it a wild horse, is the social organization and social behaviors. Geldings (castrated male horses) no longer exhibit the natural behaviors of non-castrated stallions. We know this to be true from hundreds of years [of] experience with gelded domestic horses. Furthermore, gelded stallions will not keep their bands together, which is an integral part of a viable herd. These social dynamics were molded by millions of years of evolution, and will be destroyed if the [agency] returns castrated horses to the HMAs. . . . Castrating horses will effectively remove the biological and physiological controls that prompt these stallions to behave like wild horses. This will negatively impact the place of the horse in social order of the band and the herd.

As discussed above, AWHC has challenged a decision by BLM to geld wild horses and release them to the range, and that challenge is currently pending before the U.S. Court of Appeals for the Ninth Circuit. *See Am. Wild Horse Campaign v. Bernhardt*, No. 18-17403. Because the

Ninth Circuit's ruling regarding the degree of environmental review that must accompany a gelding decision by the BLM will likely have an extremely significant bearing on the USFS's decision regarding the proposed use of gelding in the Heber Territory, AWHC reiterates its recommendation that the USFS wait for the Ninth Circuit to issue a ruling before analyzing or implementing gelding as a management tool for the Heber Territory.

2. Vasectomies

AWHC asks that vasectomizing stallions also be eliminated from consideration in this proposal. However, if the USFS moves forward with its analysis of this method, the agency must consider the detrimental effects that vasectomies could have on wild stallions. There is very little known about the effects of the vasectomy procedure on horses. Domesticated horses rarely, if ever, undergo this procedure. Instead, veterinarians are much more familiar with the gelding procedure.

Performing vasectomies is not a widely practiced procedure and further research is needed to perfect a safe technique for performing vasectomies in stallions and to demonstrate whether this approach will reduce population growth rates. Further, the NAS found that more research was needed before vasectomies could be used as a management tool, yet such research has yet to be conducted. (Attachment 1, p. 133). While the NAS found chemical vasectomy to be a potentially promising fertility control method, the scientific panel noted that more research was necessary and that, ultimately, successful fertility control efforts must be female directed, as one intact male can impregnate many females. Therefore, much more research and study are needed before the USFS can implement vasectomies as a viable herd management strategy.

As a result, the USFS should drop surgical sterilization from consideration as an alternative for consideration as a population management tool.

4. Reject the use of GonaCon as a fertility control vaccine.

AWHC asks that the use of GonaCon in the Heber Territory be eliminated from consideration. GonaCon is an experimental fertility control vaccine that interferes with the production of reproductive hormones, which drive natural behaviors in wild horses. However, if the agency must move forward with its analysis of this method in the proposal then AWHC asks that the agency recognize that not much is known about the long-term safety and efficacy and the impacts to wild horse behaviors and natural social behaviors, which are the differentiating factors for these federally-protected animals. In fact, the peer-reviewed article on the ongoing GonaCon study in the Theodore Roosevelt National Park emphasizes that research on the use of GonaCon as a form of fertility control for wild horses is in its nascent stage and therefore limited:

While documentation of contraceptive efficacy and side effects of GonaCon have been described for a variety of wild ungulates, similar evidence for feral horses is limited. To our knowledge, only two long-term (3 years) empirical investigations have been conducted using GonaCon-Equine.... In the study with free-ranging horses, vaccination significantly reduced foaling rates of treated females, however, effectiveness was

inconsistent over time and was substantially lower than that reported for captive feral mares treated with the same vaccine [22]. Furthermore, neither of these studies integrated revaccination as a strategy to increase vaccine efficacy. Lastly, these inquiries provide little quantitative evidence of the reversibility of the effects of this vaccine, the presence or absence of adverse side effects related to inoculation of pregnant mares, and neither examined the potential for increased side effects with reimmunization.

Knowledge of the effects of GonaCon-Equine on equid fetal health, neonatal survival, and body condition is largely anecdotal...Clearly, additional research is needed to further define the long-term therapeutic effectiveness and contraindications of this potential technology before resource managers can make informed decisions regarding its practical application for stabilizing the growth rate of free-ranging feral horse populations. (Attachment 12, p.5).

Additionally, the NAS specifically responded that:

Preserving natural behaviors is important, so GonaCon **seems** [emphasis] more appropriate for use in females in that some research has **suggested** [emphasis] that female sexual behavior continues. However, further studies on behavioral effects of this product are needed. (Attachment 1, p.7).

This experimental fertility control drug is not appropriate for field use and should be dropped from consideration. At bottom, because published research on GonaCon in horses is limited, there are remaining questions regarding negative impacts to pregnant mares (association with abortion when given in early stages of pregnancy), long-term physiological effects, and whether the vaccine is a permanent sterilant or reversible. Even the short-term social/behavior effects are not yet established. Thus, this experimental fertility control drug is not appropriate for field use and should be dropped from consideration in this proposed analysis.

5. Redraw the boundaries of the Territory to accurately reflect the wild horses' habitat.

The current boundaries of the Heber Territory do not accurately reflect the habitat area for these federally-protected horses, resulting in many horses being designated as “outside the Territory.” The management plan must identify and disclose the reasons why the Heber wild horses are currently outside of the Territory boundary, including but not limited to natural events such as fire and the construction or reconstruction of fencing. Then, the management plan must analyze where the horses are presently found and determine whether the boundaries of the Territory can be redrawn or whether horses can be moved back within the Territory. Horses outside the Territory should be relocated within the boundaries, back inside their federally designated range. Finally, the management plan must address what mitigating actions the USFS can take to make sure that the horses stay within the Territory boundaries for the foreseeable future. The USFS must consider this action as an alternative to simply removing any horses that are found outside of the Territory.

6. Create protocols for the housing, care, placement and tracking of all wild horses removed from the Territory.

The USFS must fully disclose and analyze its plans for any horses removed from the Territory, including where they will be housed, how they will be cared for, and what the Forest Service plans for their long-term placement and care. By law, the USFS may not destroy healthy horses or sell them for slaughter. The USFS must create a system for placing and tracking all horses removed from the Territory. This should include, but not be limited to, the implementation of a year-long adoption process, similar to that of the BLM, by which the adopter does not gain title to the horse until one year of ownership and care. The USFS must also develop a database, ideally an agency-wide database, for tracking the disposition of each horse as well as a system for checking potential adopters or purchasers for their history regarding horse adoptions, sales and past animal abuse. Processes like these will help ensure that the USFS is complying with Congress' directive to protect federally-protected wild horses and burros from slaughter.

C. Information that must be included in the EA

As a preliminary matter, AWHC notes that, as described above, an EIS rather than an EA is both legally required and a vastly superior mechanism for analyzing the environmental impacts of, and considering alternatives for, the management of wild horses in this area. However, regardless of whether USFS opts to prepare an EIS or EA, the following information must be included in a draft document and made available to the public for review and comment:

1. All information regarding previous removals in the Heber Territory, including the number of horses captured, removed and returned to the range, as well as the number of mares inoculated with fertility control, the number of stallions sterilized in past roundups (if any) and returned to the range, and the estimated post-gather population.
2. Detailed annual census information, both actual counts and projected population numbers, including information about the data on which population projections/estimates are based.
3. Complete breakdown of livestock grazing in the Territory, including active and actual Animal Unit Month (“AUM”) allocations for each of the past five years.
4. All rangeland health assessments for grazing allotments in each of the Heber Territory. All monitoring data should also be included and the USFS should clearly describe the data delineating the separate impacts of livestock use versus wild horse use.
5. All genetic analyses of the horses and potential effects of the proposed removal. All genetic analysis reports should be included in an appendix. All data indicating intermingling of wild horse populations should also be included.
6. Detailed information on prior use of PZP in the Heber Territory, including numbers and ages of mares vaccinated, percent of mare population treated with

PZP, years of treatment, outcome of treatment, and the impacts of current treatment plans on projected population numbers.

7. A detailed map of all water sources and fencing within the Heber Territory, and disclosure of water allocations for all uses, as well as an explanation of how fencing and engineering of wells and springs for livestock grazing has affected water availability for wild horses and other wildlife species.
8. Information on the hunting and killing of predators within and around the Heber Territory for each of the past three years and analysis of how these activities impact the thriving natural ecological balance in the Territory, including natural predation. This should include any predator eradication data maintained by the Fish and Wildlife Service or other government entities, including the office of Wildlife Services within the United States Department of Agriculture.

D. Improved Public Observation Must Be Considered, Analyzed and Implemented

The USFS is well aware of the significant public interest in the agency's management of wild horses and burros and its roundup operations. The humane treatment of the horses is paramount.

Removal of wild horses from public lands negatively impacts the human environment for those who enjoy observing, photographing and researching these wild horses. Given the tremendous public interest and the agency's claims to operate with full transparency, the following actions should be considered, analyzed and implemented to ensure that the proposed analysis is conducted in a manner that minimizes stress and injuries to wild horses and ensures interested parties have the ability to adequately monitor the USFS's actions once the proposed analysis is completed:

- Trap sites should be located on public lands to allow public observation of roundup activities. No trap site shall be located on private lands for which the owners will not give permission for public observation of roundup activities, nor shall USFS locate a trap site on public lands in a location that can only be reached by crossing private lands if the owners will not allow public passage for the purpose of observing USFS activities at the trap site.
- Real-time cameras with GPS should be installed on all helicopters used in roundup operations and video should be live streamed on the Internet. This will improve the transparency of roundup operations and enable the USFS and public to monitor the direct impact motorized vehicle usage has on wild horses and the environment.
- Real-time cameras should be installed on the trap, the corral and the temporary holding pens, and video should be live streamed on the Internet, again, so that USFS personnel, public and media can monitor the entire roundup operation and treatment of the horses and burros.

Video cameras will improve the transparency of roundup operations and enable the USFS and public to monitor the direct impact motorized vehicle usage has on wild horses and the

environment. In addition, real-time cameras should be installed on the trap, the corral and the temporary holding pens, again, so that USFS personnel, public and media can monitor the entire roundup operation and treatment of the horses. AWHC would be happy to provide and financial assistance to establish these real-time cameras as described above.

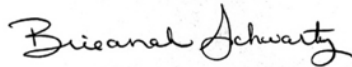
III. CONCLUSION

We expect that the USFS will provide the level of detail described and requested above, which is necessary for informed decision making. We further expect that the USFS will provide a full and accurate accounting of how many public comments were submitted on this scoping plan and what positions and/or recommendations were presented in them, as the agency is legally required to do under the National Environmental Policy Act.

Our public lands and the wild horses that live on them belong to all Americans, and they must be managed in the interest of all Americans. Wild horse management must be humane, cost-effective, and based on science. The proposed management action for the Heber Wild Horse Territory must be drafted in accordance with these criteria. For this reason, AWHC, and 3,749 of our supporters (Attachment 13), request that the above information be incorporated and analyzed in the USFS's draft management plan for the Heber Wild Horse Territory.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Brieanah Schwartz". The signature is written in black ink on a white background.

Brieanah Schwartz, Esq.
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Attachments

Attachment 1: “Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward,” National Academy of Sciences, June 2013.

Attachment 2: Public Polls

Attachment 3: Veterinarians’ Letter to Secretary Bernhardt

Attachment 4: House Letter to Secretary Bernhardt

Attachment 5: Senate Letter to Secretary Bernhardt

Attachment 6: U.S. District Court Judge Beryl A. Howell Decision – Civil Action No. 11-02222 (BAH)

Attachment 7: 2015 National Resource Council Report

Attachment 8: Statement by Dr. Michael Ball

Attachment 9: Statement by Dr. Robin Kelly (as included with AWHC’s First 2018 Comments on the BLM’s Oregon Spay Experiments)

Attachment 10: Statement by Dr. Allen Rutberg (as included with AWHC’s First 2018 Comments on the BLM’s Oregon Spay Experiments)

Attachment 11: Statement by Dr. Jay Kirkpatrick on Gelding

Attachment 12: Utility of Low-Stress Livestock Handling Techniques for Management of Feral Horses at Theodore Roosevelt National Park,”. Blake McCann, *The Stockmanship Journal*, July 2015.

Attachment 13: AWHC’s Petition and Signatures on the Heber Wild Horse Territory Management Plan





Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward


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Using Science to Improve the BLM WILD HORSE AND BURRO PROGRAM

A WAY FORWARD

Committee to Review the Bureau of Land Management
Wild Horse and Burro Management Program

Board on Agriculture and Natural Resources

Division on Earth and Life Studies

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Preface

千里之行，始于足下

Lao-tzu, *The Way of Lao-tzu*

The above quotation has been translated most commonly as “A journey of a thousand miles begins with a single step” and, alternatively, as “Even the longest journey must begin where you stand.” In both interpretations, there is relevance to moving forward to improve management of free-ranging horses and burros on public lands in the western United States. Although there is a broad spectrum of public opinion regarding how horses should be managed on the land, there is also common ground as to the goal of sustaining healthy equid populations managed on healthy rangeland. In light of the charge to our committee and in the course of our public engagement, it is clear that the status quo of continually removing free-ranging horses and then maintaining them in long-term holding facilities, with no foreseeable end in sight, is both economically unsustainable and discordant with public expectations. It is equally evident that the consequences of simply letting horse populations, which increase at a mean annual rate approaching 20 percent, expand to the level of “self-limitation”—bringing suffering and death due to disease, dehydration, and starvation accompanied by degradation of the land—are also unacceptable. Those facts define the point from which we must begin the journey. However, it also provides a direction for the next steps: how can the natality be effectively managed so as to ensure that genetically viable, physically and behaviorally healthy equid populations are maintained on the land while preserving the ecosystem itself?

The committee has endeavored to examine the full array of options to meet that goal by reviewing prior National Research Council reports on the Wild Horse and Burro Program, studying existing data and current program procedures used by the Bureau of Land Management, and inviting experts to present evidence related to equid behavior, genetics, and reproduction as well as management approaches. Importantly, the committee did not limit itself to free-ranging horses and burros in the western United States but incorporated knowledge derived from the study of equid populations as diverse as donkeys in Sicily, zebras in Africa, and horses on Assateague Island and other barrier islands of the eastern United States. In a similar vein, the committee included studies of diverse ecosystems in which multiple species overlap, such as Yellowstone and the Serengeti, and lessons learned

in resolution of environmental issues in which different sectors of the public held views that once seemed irreconcilable. The committee took seriously the public's valuation of free-ranging horses and burros on public lands, the importance of promoting a healthy multiple-use ecosystem, and the economic consequences of simply continuing the status quo. On behalf of the committee, I want to express my appreciation to each and every person who took the time, effort, and expense of providing public comment and to those who shared their "citizen science" data with the committee.

A study of this magnitude requires a tremendous commitment from the committee members. All have sacrificed evenings, weekends, and vacations—without financial compensation—in this commitment and in their desire to bring the best possible science to bear on a challenging issue. Individually and collectively, they brought a wealth of experience and knowledge and engaged in vigorous intellectual debate to meet the challenge. On behalf of the committee, I express our thanks and appreciation to the study director, Kara Laney; to Robin Schoen, director of the Board on Agriculture and Natural Resources; to Janet Mulligan, senior program associate for research; and to Kati Reimer, senior program assistant. Without their planning, organization, and editing expertise, this report would not have been possible. I also want to recognize the valuable contributions of Dr. Irwin Liu, who provided expertise on equid fertility.

Science alone, even the best science, cannot resolve the divergent viewpoints on how best to manage free-ranging horses and burros on public lands. Evidence-based science can, however, center debate about management options on the basis of confidence in the data, predictable outcomes of specific options, and understanding of both what is known and where uncertainty remains. I am confident that this study provides a centerpoint and hope that it will serve as a guide for the first step in the journey toward ensuring that genetically viable, physically and behaviorally healthy equid populations can be maintained while preserving a thriving, balanced ecosystem on public lands.

Guy Hughes Palmer
*Chair, Committee to Review the Bureau of Land Management
Wild Horse and Burro Management Program*

Acknowledgments

This report is the product of the cooperation and contribution of many people. The members of the committee thank all the speakers who provided briefings to the committee (Appendix C contains a list of presentations to the committee). Members also wish to express gratitude to Dr. Irwin Liu, University of California, Davis, for his time and input.

This report has been reviewed in draft form by persons chosen for their diverse perspectives and technical expertise in accordance with procedures approved by the National Research Council's Report Review Committee. The purpose of this independent review is to provide candid and critical comments that will assist the institution in making its published report as sound as possible and to ensure that the report meets institutional standards of objectivity, evidence, and responsiveness to the study charge. The review comments and draft manuscript remain confidential to protect the integrity of the deliberative process. We wish to thank the following for their review of this report:

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Although the reviewers listed above have provided many constructive comments and suggestions, they were not asked to endorse the conclusions or recommendations, nor did they see the final draft of the report before its release. The review of this report was overseen by coordinator, Dr. Stephen W. Barthold, University of California, Davis, appointed by the Division on Earth and Life Studies, and monitor, Dr. May R. Berenbaum, University of Illinois, Urbana-Champaign, appointed by the National Research Council's Report Review Committee. The coordinator and monitor were responsible for making certain that an independent examination of this report was carried out in accordance with institutional procedures and that all review comments were carefully considered. Responsibility for the final content of this report rests entirely with the authoring committee and the institution.

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Summary

Since 1971, the Bureau of Land Management (BLM) of the U.S. Department of the Interior has been responsible for managing the majority of free-ranging horses and burros on arid federal public lands in the western United States. In the Wild Free-Roaming Horses and Burros Act of 1971 (P.L. 92-195), the U.S. Congress charged BLM with the “protection, management, and control of wild free-roaming horses and burros on public lands.” However, the agency is also tasked with managing the land for multiple uses. Public lands provide habitat for horses and burros, but they are also used for recreation, mining, forestry, grazing for livestock, and habitat for wild ungulates and other species. Therefore, although the act stipulated that free-ranging horses and burros were “an integral part of the natural system of the public lands,” it limited their range to “their known territorial limits” in 1971. The land was to be “devoted principally but not exclusively to their welfare in keeping with the multiple-use management concept of public lands.” Horses and burros were to be managed at “the minimal feasible level.” In addition, management was to “achieve and maintain a thriving natural ecological balance on the public lands,” protect wildlife habitat, and prevent range deterioration.

The goal of managing free-ranging horses and burros to achieve the vaguely defined thriving natural ecological balance within the multiple-use mandate for public lands has challenged BLM’s Wild Horse and Burro Program since its inception. When BLM commissioned the National Research Council to conduct a study of the program in 2011, budget costs for managing the animals were mounting. To sustain healthy populations on healthy rangeland and to maintain a thriving natural ecological balance, BLM attempts to manage herds within population-size ranges that it deems appropriate management levels (AMLs) for designated regions known as Herd Management Areas (HMAs). However, because there are human-created barriers to dispersal and movement and no substantial predator pressure, maintaining a herd within an AML requires removing animals in roundups, also known as gathers. Adoption demand does not balance the number of animals removed, and there is no political support for culling unadopted animals. Therefore, BLM pays for animals removed from the range to live in long-term holding pastures for the remainder

of their lives. At the time the committee's report was prepared, long-term holding costs consumed about half the Wild Horse and Burro Program's budget.

BLM is subject to ardent criticism from various stakeholders regarding its approach to management of free-ranging equids. Some parties express concern that the health of the range and the condition of other species that inhabit the land are adversely affected by populations of horses and burros that often exceed AMLs. Other members of the public think that horses and burros are unfairly restricted and are concerned that AMLs are too low to maintain genetically healthy herds and that horses and burros are confined to too little public land. They are also concerned about the stress placed on animals during gathers and in holding facilities.

To improve the sustainability and public acceptance of the program, BLM asked the National Research Council Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program to build on previous Research Council reports on

BOX S-1 **Statement of Task**

At the request of the Bureau of Land Management (BLM), the National Research Council (NRC) will conduct an independent, technical evaluation of the science, methodology, and technical decision-making approaches of the Wild Horse and Burro Management Program. In evaluating the program, the study will build on findings of three prior reports prepared by the NRC in 1980, 1982, and 1991 and summarize additional, relevant research completed since the three earlier reports were prepared. Relying on information about the program provided by BLM and on field data collected by BLM and others, the analysis will address the following key scientific challenges and questions:

1. Estimates of the wild horse and burro populations: Given available information and methods, how accurately can wild horse and burro populations on BLM land designated for wild horse and burro use be estimated? What are the most accurate methods to estimate wild horse and burro herd numbers and what is the margin of error in those methods? Are there better techniques than BLM currently uses to estimate population numbers? For example, could genetics or remote sensing using unmanned aircraft be used to estimate wild horse and burro population size and distribution?
2. Population modeling: Evaluate the strengths and limitations of models for predicting impacts on wild horse populations given various stochastic factors and management alternatives. What types of decisions are most appropriately supported using the WinEquus model? Are there additional models BLM should consider for future uses?
3. Genetic diversity in wild horse and burro herds: What does information available on wild horse and burro herds' genetic diversity indicate about long-term herd health, from a biological and genetic perspective? Is there an optimal level of genetic diversity within a herd to manage for? What management actions can be undertaken to achieve an optimal level of genetic diversity if it is too low?
4. Annual rates of wild horse and burro population growth: Evaluate estimates of the annual rates of increase in wild horse and burro herds, including factors affecting the accuracy of and uncertainty related to the estimates. Is there compensatory reproduction as a result of population-size control (e.g., fertility control or removal from herd management areas)? Would wild horse and burro populations self-limit if they were not controlled, and if so, what indicators (rangeland condition, animal condition, health, etc.) would be present at the point of self-limitation?

the program and to provide BLM with a scientific evaluation of the program's pressing challenges (Box S-1).

KEY FINDINGS

FINDING: Management of free-ranging horses and burros is not based on rigorous population-monitoring procedures.

At the time of the committee's review, most HMAs did not use inventory methods or statistical tools common to modern wildlife management. Survey methods used to obtain sequential counts of populations on HMAs were often inconsistent and poorly documented and did not quantify uncertainty related to estimates. The committee concluded that many methodological flaws identified in previous reviews of the program have persisted.

5. Predator impact on wild horse and burro population growth: Evaluate information relative to the abundance of predators and their impact on wild horse and burro populations. Although predator management is the responsibility of the U.S. Fish and Wildlife Service or State wildlife agencies and given the constraints in existing federal law, is there evidence that predators alone could effectively control wild horse and burro population size on BLM land designated for wild horse and burro use?
6. Population control: What scientific factors should be considered when making population control decisions (roundups, fertility control, sterilization of either males or females, sex ratio adjustments to favor males, and other population control measures) relative to the effectiveness of control approach, herd health, genetic diversity, social behavior, and animal well-being?
7. Fertility control of wild horses: Evaluate information related to the effectiveness of fertility control methods to prevent pregnancies and reduce herd populations.
8. Managing a portion of a population as nonreproducing: What scientific and technical factors should BLM consider when managing for wild horse and burro herds with a reproducing and nonreproducing population of animals (i.e., a portion of the population is a breeding population and the remainder is nonreproducing males or females)? When managing a herd with reproducing and nonreproducing animals, which options should be considered: geldings, vasectomized males, ovariectomized mares, or other interventions? Is there credible evidence to indicate that geldings or vasectomized stallions in a herd would be effective in decreasing annual population growth rates, or are there other methods BLM should consider for managing stallions in a herd that would be effective in tangibly suppressing population growth?
9. Appropriate Management Level (AML) establishment or adjustment: Evaluate BLM's approach to establishing or adjusting AML as described in the 4700-1 *Wild Horses and Burros Management Handbook*. Based upon scientific and technical considerations, are there other approaches to establishing or adjusting AML BLM should consider? How might BLM improve its ability to validate AML?
10. Societal considerations: What are some options available to BLM to address the widely divergent and conflicting perspectives about wild horse and burro management and to consider stakeholder concerns while using the best available science to protect land and animal health?
11. Additional research needs: Identify research needs and opportunities related to the topics listed above. What research should be the highest priority for BLM to fill information and data gaps, reduce uncertainty, and improve decision-making and management?

However, improvements in population monitoring have been implemented in recent years, and the committee supports these efforts. Aggregating neighboring HMAs, on which free movement of horses or burros is known or likely, into HMA complexes to coordinate population surveys, removals, and other management actions can improve data quality and interpretation and enhance population management (Figure S-1). The committee commends the partnership between BLM and the U.S. Geological Survey to develop rigorous, practical, and cost-effective survey methods that account for imperfect detection of animals. The committee strongly encourages continuing this collaborative research effort to develop a suite of survey methods effective for the variety of landscapes occupied by free-ranging equids. Transferring this knowledge to managers responsible for monitoring populations is essential if the reforms are to be institutionalized.

BLM should develop protocols for how frequently surveys are to be conducted and ensure that the resources are available to field personnel to maintain a standardized survey schedule. Consideration should be given to identifying sentinel populations in a subset of HMAs that represent the diverse ecological settings throughout western rangelands. Detailed, annual demographic studies of sentinel populations could be used to improve assessment of population dynamics and responses to changes in animal density, management interventions, seasonal weather, and climate. **Record-keeping needs to be substantially improved; the committee recommends the development of a uniform**

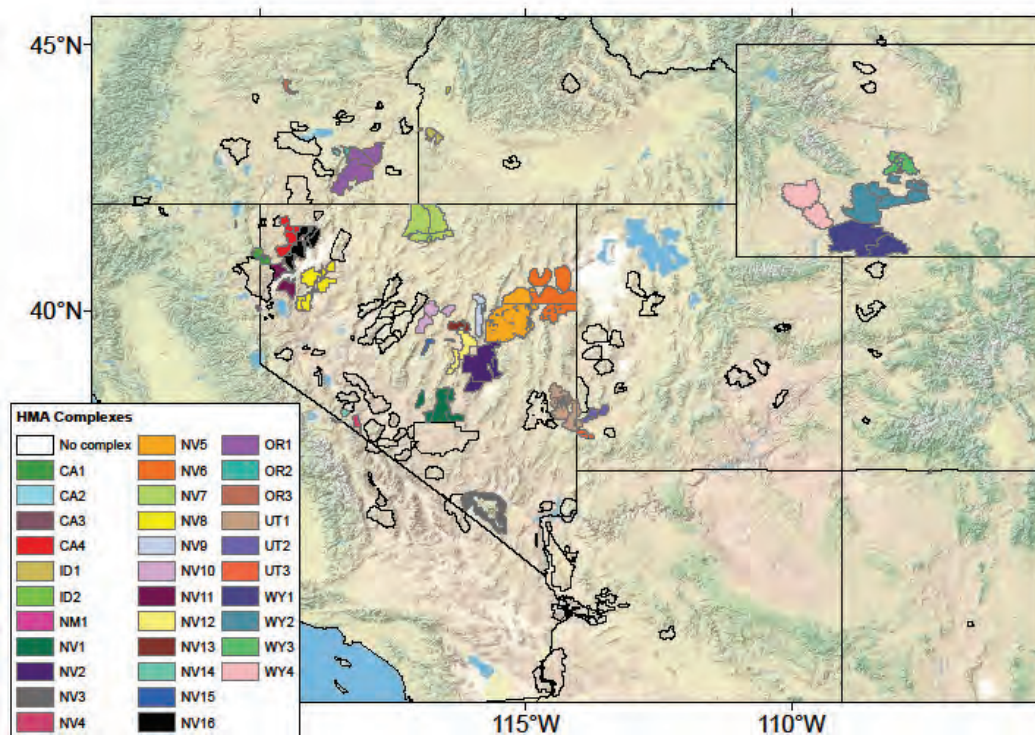


FIGURE S-1 Herd Management Areas managed together or with Wild Horse (or Burro) Territories as complexes.

NOTE: Blank Herd Management Areas are not managed as part of a complex.

DATA SOURCE: Mapping data and complex information provided by the Bureau of Land Management.

relational database that is accessible to and used by all field offices for recording all pertinent population survey data.

FINDING: On the basis of the information provided to the committee, the statistics on the national population size cannot be considered scientifically rigorous.

The links between the statistics on the national population size and actual population surveys, which are the foundational data of all estimates, are obscure. The procedures used for developing annual HMA population-size estimates from counts are not standardized and often not documented. Therefore, it seems that the national statistics are the product of hundreds of subjective, probably independent, judgments and assumptions by range managers and administrators about the proportion of animals counted during surveys, population growth rates, effects of management interventions, and potential animal movements between HMAs.

Development and use of a uniform and centralized relational database, which captures all inventory and removal data generated at the level of the field offices and animal processing and holding facilities, to generate annual program-wide statistics would provide a clear connection between the data collected and the reported statistics. **The committee also suggests that the survey data at the HMA level and procedures used to modify the survey data to generate population estimates be made readily available to the public to improve transparency and public trust in the management program.**

In the committee's judgment, the reported annual population statistics are probably underestimates of the actual number of equids on the range inasmuch as most of the individual HMA population estimates are based on the assumption that all animals are detected and counted in population surveys. A large body of scientific literature on techniques for inventorying horses and other large mammals clearly refutes that assumption and suggests that the proportion of animals missed on surveys ranges from 10 to 50 percent. An earlier National Research Council committee and the Government Accountability Office also concluded that reported statistics were underestimates.

FINDING: Horse populations are growing at 15-20 percent a year.

The committee concluded that the age-structure data on horses removed from the range can provide a reasonable assessment of the general growth rate of the free-ranging horse populations in the western United States. The population growth rate index derived from those data is generally consistent with the herd-specific population growth rates reported in the literature. On the basis of the published literature and the additional management data reviewed by the committee, the committee concluded that most free-ranging horse populations managed by BLM are probably growing at 15-20 percent a year.

FINDING: Management practices are facilitating high horse population growth rates.

Free-ranging horse populations are growing at high rates because their numbers are held below levels affected by food limitation and density dependence. In population ecology, density dependence refers to the influence of density on such population processes as population growth, age-specific survival, and natality. Effects of increased population density are manifested through such changes as reductions in pregnancy, fecundity, percentage of females lactating, young-to-female ratios, and survival rates. Regularly removing horses

holds population levels below food-limited carrying capacity. Thus, population growth rate could be increased by removals through compensatory population growth from decreased competition for forage. As a result, the number of animals processed through holding facilities is probably increased by management.

FINDING: The primary way that equid populations self-limit is through increased competition for forage at higher densities, which results in smaller quantities of forage available per animal, poorer body condition, and decreased natality and survival.

Density dependence, due to food limitation, will reduce population growth rates in equids and other large herbivores through reduced fecundity and survival. Case studies show that animal responses to density dependence will include increased numbers of animals that are in poor body condition and are dying from starvation.

Rangeland health is also affected by density dependence. Equids invariably affect vegetation abundance and composition. Reduced vegetation cover, shifts in species composition, and increased erosion rates often occur on rangelands occupied by equids. However, no case study has reported that the changed vegetation cannot persist over a long period of time or that complete loss of vegetation cover is an inevitable outcome. The results are consistent with theoretical predictions that when a herbivore population is introduced, vegetation cover will initially change and productivity will often be reduced by herbivory. In some environments, however, moderate levels of herbivory have little adverse effect or even have favorable effects on plant production. Vegetation production may decline, but it may stabilize at a lower level as herbivore populations come into quasiequilibrium with the altered vegetation. Whether such a system can persist over the long term is unknown.

FINDING: Predation will not typically control population growth rates of free-ranging horses.

A large predator, when abundant, can influence the dynamics of free-ranging ungulates. However, the potential for predators to affect free-ranging horse populations is limited by the absence of abundance of such predators as mountain lions and wolves on HMAs. Mountain lions are ambush predators and require habitats that have broken topography and tree cover, whereas equids favor habitats that have more extensive viewsheds. Wolves are capable of chasing prey across open, flat topography and have substantial effects on a few horse populations on other continents and certain areas in Canada. Despite evidence that wolves prey on equids elsewhere, the committee was unable to identify any examples of wolf predation on free-ranging equids in the United States. The distribution of wolves in the western United States has been severely reduced by humans, and few habitats of free-ranging horses were occupied by wolves at the time the report was prepared; in addition, there had been little study of the overlap between burros and predators.

FINDING: The most promising fertility-control methods for application to free-ranging horses or burros are porcine zona pellucida (PZP) vaccines, GonaCon™ vaccine, and chemical vasectomy.

The criteria most important in selecting promising fertility-control methods for free-ranging equids are the delivery method, availability, efficacy, duration of effect, and potential physiological and behavioral side effects. Considering those criteria, the methods judged

most promising are PZP and GonaCon vaccination of females and chemical vasectomy in males. Each method has advantages and disadvantages (Table S-1). Of the PZP vaccines, PZP-22 and SpayVac® seem most appropriate and practical because of their longer duration of effect. GonaCon can be used and has been tested in males, and its effects are similar to those of chemical castration. Preserving natural behaviors is important, so GonaCon seems more appropriate for use in females in that some research has suggested that female sexual behavior continues. However, further studies on behavioral effects of this product are needed. Chemical vasectomy is promising as an alternative to or in combination with treating females. The effects of surgical vasectomy, and presumably of chemical vasectomy, on sexual behavior closely parallel those of the PZP vaccines and possibly of GonaCon.

No method that does not affect physiology or behavior has been developed. The most appropriate comparison in assessing the effects of any fertility-control method is with gathering. That is, to what extent does the prospective method affect health, herd structure, and

TABLE S-1 Advantages and Disadvantages of the Most Promising Fertility-Control Methods

Method	Advantages	Disadvantages
PZP-22 and SpayVac® ^a	Research and application in both captive and free-ranging horses	Capture needed for hand injection of PZP-22
	Allows estrous cycles to continue so natural behaviors are maintained	Extended breeding season requires males to defend females longer
	High efficacy	With repeated use, return to fertility becomes less predictable
	Can be administered during pregnancy or lactation	Out-of-season births are possible
Chemical Vasectomy	Simpler than surgical vasectomy	Requires handling and light anesthesia
	Permanent	Permanent
	No side effects expected	Only surgical vasectomy has been studied in horses, so side effects of the chemical agent are unknown
	Normal male behaviors maintained	Extended breeding season requires males to defend females longer and may result in late-season foals if remaining fertile males mate
GonaCon™ for Females	Should have high efficacy	Only surgical vasectomy has been studied in horses, so efficacy rate is unknown
	Effective for multiple years	Capture may be needed for hand injection of initial vaccine and any boosters
	Sexual behavior exhibited	Lower efficacy than PZP-vaccine products, especially after first year
	Social behaviors not affected in the single field study	Sexual behavior may not be cyclic, inasmuch as ovulation appears to be blocked
		Should not be administered during early pregnancy because abortion could occur
		Few data on horses

^aPZP-22 and SpayVac® are formulated for longer efficacy and require further documentation of continued efficacy and of rate of unexpected effects.

the expression of natural behaviors compared with the effects of gathering? The selected methods are considered the most promising because they have the fewest and least serious effects on those parameters. Their application requires handling the animals (gathering), but this process is no more disruptive than the current method for controlling numbers and does not entail the further disruption of removal and relocation to long-term holding facilities. Considering all the current options, these three methods, either alone or in combination, offer the most acceptable alternative for managing population numbers.

FINDING: Management of equids as a metapopulation is necessary for the long-term genetic health of horses and burros at the HMA or HMA-complex level.

The committee reviewed the results of genetic studies of 102 horse HMAs that were based on samples collected during 2000-2012 and found that the reported levels in genetic diversity for most populations were similar to those in healthy mammalian populations, although that could change in time. Little is known about the genetic health of burros; the few studies that have been conducted reported low genetic diversity compared with that in domestic donkeys. Management actions to achieve optimal genetic diversity may involve intensive management of individual animals in HMAs, translocations of free-ranging horses and burros among HMAs or holding areas to effect genetic restoration, or some combination of these. **The committee recommends routine monitoring at all gathers and the collection and analysis of a sufficient number of samples to detect losses of diversity. The committee also recommends that BLM consider at least some animals on different HMAs as a single population and use the principles of metapopulation theory to direct management activities that attain and maintain the level of genetic diversity needed for continued survival, reproduction, and adaptation to changing environmental conditions.** Although there is no minimum viable population size above which a population can be considered forever viable, studies suggest that thousands of animals will be needed for long-term viability and maintenance of genetic diversity. Few HMAs are large enough to buffer the effects of genetic drift and herd sizes must be maintained at prescribed AMLs, so managing HMAs as a metapopulation will reduce the rate of reduction of genetic diversity over the long term. Movement of individual animals among HMAs to maintain genetic diversity will need to be guided by genetic, demographic, behavioral, and logistical factors.

FINDING: Phenotypic data have not been recorded and integrated into genetic management of free-ranging populations. Recording the occurrence of diseases and clinical signs and the ages and sexes of the affected animals would allow BLM to monitor the distribution and prevalence of genetic conditions that have direct effects on population health.

Ten or 11 conditions in horses are known to be caused by genetic mutations. Some are not lethal, so it is possible for the mutations to increase in frequency in HMAs, especially if inbreeding occurs. Few conditions present clinical signs that would be unambiguous and readily discernible during a gather. However, because many of the conditions can be diagnosed via genetic screening of blood or hair samples, surveillance of the genetic mutations underlying them is possible in HMAs. Screening samples from gathered horses could generate frequencies of the alleles involved in the disorders, and the frequencies could be monitored during later gathers to determine whether a particular HMA has a higher occurrence of a given mutation that might affect the fitness of the herd. **Although there are no known clinical issues in burros, the committee recommends that BLM routinely monitor**

and record any morphological anomalies in burros that may indicate the deleterious effects of inbreeding.

FINDING: Input parameters used in the WinEquus model are not transparent, and it is unclear whether or how results are used in management decisions.

BLM includes results of WinEquus population modeling in its gather plans and environmental assessments of horse HMAs. WinEquus uses an individual-based approach (each animal is tracked individually as opposed to the use of aggregated age-sex or life-stage classes) to simulate population dynamics and management of free-ranging horses in the framework of age-structured and sex-structured population models. Given appropriate data, it can incorporate the effects of environmental and demographic stochasticities, density dependence, and management actions and can simulate population dynamics for up to 20 years. There are no similar modeling studies of burros.

The committee found that, given appropriate data, WinEquus can adequately simulate horse population dynamics under alternative management actions (no treatment, removal, female fertility control, and the combination of removal and fertility control). However, the WinEquus results depend heavily on values of input parameters and on the WinEquus options selected by the user when setting up the simulations. Values of input parameters and data used to estimate the values were rarely provided, and the WinEquus options selected often were not described. Most gather plans and environmental assessments simply copied and pasted WinEquus output and gave no explanation or interpretation of the results. Those results cannot be adequately interpreted without knowledge of the input parameter values and WinEquus options selected by the user.

It appeared that one of the default datasets was used to model population dynamics of most or all HMAs or HMA complexes. It is therefore not surprising that most plans and assessments arrived at identical conclusions regarding the potential effects of the management alternatives considered.

The majority of gather plans conveyed nothing about whether or how results of population modeling were used to make management decisions, so the committee could not determine with certitude whether or how BLM uses WinEquus results. Specifically, it was difficult to determine whether results were used to make management decisions or were offered as justification for management decisions that were made independently of modeling results. Furthermore, in the absence of at least some site-specific data and relevant information regarding input parameters and WinEquus options, model results would be difficult for a critical reader to accept as pertinent and meaningful. A clear description of input parameters, including those needed for various management alternatives, and a detailed description of various WinEquus options selected by the user would help the general public to determine the reliability of WinEquus modeling results. In addition, a clear explanation of whether or how results of population modeling were used would improve transparency with the public.

FINDING: A more comprehensive model or suite of models could help BLM to address and adapt to challenges related to management of horses and burros on the range, management of animals in holding facilities, and program costs.

The adequacy of a population model depends on how (and for what purpose) BLM plans to use it, characteristics and processes included in it, management alternatives to be simulated, and availability of data to assign values to parameters of the model. If BLM

plans to use a population model for short-term horse population projection and to evaluate potential effects of such management alternatives as female fertility control, removal, or a combination of the two, WinEquus is probably sufficient.

However, a suitable modeling framework could inform short-term and long-term management plans. Such a framework would simulate life history, social behavior, mating system, genetics, forage limitation, use of habitat, climate variation, and effects of alternative management actions throughout horse or burro life spans. The usefulness of the information obtained from population modeling is directly related to the reliability of the data used to assign values to parameters and depends on how adequately the model structure reflects life history of the study organisms and whether and to what extent deterministic, stochastic, and management actions that affect the study population are considered. **The committee recognizes that HMA managers often do not have adequate input information to estimate model parameter values for most HMAs. Therefore, efforts should be made to ensure that future modeling exercises use data from the target HMA or HMA complex or a sentinel population that closely resembles the target population being modeled.**

A comprehensive modeling study that evaluates the population dynamics of horses or burros in the western rangelands and in short-term and long-term holding facilities and the costs and consequences of management alternatives, including those not yet available to BLM, would help in evaluating whether and to what extent stated management objectives are achievable under current or projected funding situations. Such a study could help to identify the most effective or cost-effective management options to achieve the objectives or the achievable goals given available funding and policy constraints.

FINDING: The *Wild Horses and Burros Management Handbook* lacks the specificity necessary to guide managers adequately in establishing and adjusting appropriate management levels.

The *Wild Horses and Burros Management Handbook*, issued by BLM in 2010, provides some degree of consistency in goals, forage allocation, and general habitat considerations and should help to improve consistency in how AMLs are set. However, it does not provide detail related to monitoring and assessment methods. The resulting flexibility allows managers to decide what specific approaches fit local environmental conditions and administrative capacity but makes it difficult to review the program's on-the-ground methods. The handbook would be more informative if it provided guidelines on how to conduct various kinds of assessments (even if there were a variety of appropriate methods available) or referenced appropriate sources, linking them to particular settings or situations. The handbook lacks clear protocols for evaluating habitat components other than forage availability. Without clear protocols specific enough to ensure repeatability, the monitoring organization cannot determine whether observed change is due to changes in condition or to changes in methods. **Protocols should also include establishment of controls when the goal is to distinguish treatment or management effects from other causes of change.**

FINDING: The handbook does not clarify the vague legal definitions related to implementing and assessing management strategies for free-ranging equids.

Managing equid populations as free-ranging with the minimal management called for in the legislation entails conceptual challenges associated with defining what constitutes land deterioration or health, thriving natural ecological balance, and rangeland condition. For example, the concept of a thriving natural ecological balance does not provide guidance

for determining how to allocate forage and other resources among multiple uses, which ecosystem components should be included and monitored in the “balance,” or how to decide when a system is out of “balance.” It brings up arguments over whether such a balance exists in nature or is even possible. Furthermore, it is easily conflated with the forage allocation process, which is a policy decision. Similarly, rangeland health and setting of land health standards may be seen as a problem of developing specific ecological measurements and standards or as a matter of arriving at a consensus about how rangelands should be maintained. Without precise definitions, those concepts are uninformed by science and open to multiple interpretations. The handbook does not provide assistance in dealing with this dilemma.

An alternative approach for setting AMLs would address the challenge of defining terms used as management criteria, including *appropriate, thriving, natural, in balance, healthy, and deteriorated*. The approach would involve the development of a conceptual model for ecosystem functioning relative to management objectives and of indicators to measure the degree of departure from a scientifically informed conceptual model of an “appropriately” functioning free-ranging equid ecosystem.

FINDING: How AMLs are established, monitored, and adjusted is not transparent to stakeholders, supported by scientific information, or amenable to adaptation with new information and environmental and social change.

AMLs are a focal point of controversy between BLM and the public. It is therefore necessary to develop and maintain standards for transparency, quality, and equity in AML establishment, adjustment, and monitoring. Research suggests that transparency is an important contributor to the development of trust between agencies and stakeholders. The public should be able to understand the methods used and how they are implemented and should be able to access the data used to make decisions. Transparency will also encourage high quality in data acquisition and use. Data and methods used to inform decisions must be scientifically defensible. Resources are allocated to horses or burros in a context of contending uses for BLM lands, all of which have some standing in the agency’s charge for multiple-use management.

Environmental variability and change, changes in social values, and the discovery of new information require that AMLs be adaptable. Adaptive management, an iterative decision-making process, can incorporate development of management objectives, actions to address these objectives, monitoring of results, and repeated adaptation of management to achieve desired results. A key tenet of adaptive management is treating management actions as testable hypotheses. **Maximizing long-term knowledge of the system and thereby improving management hinge on several fundamental tenets of research and monitoring design, including the use of controls and replication and controlling for variability over time. Uncertainty should be explicitly incorporated into estimated measures (such as herd size or utilization rate on an HMA).** The committee concludes that the above principles could be more thoroughly integrated into the Wild Horse and Burro Program to increase the defensibility and scientific validity of management actions.

FINDING: Resolving conflicts with polarized values and opinions regarding land management rests on the principles of transparency and community-based public participation and engagement in decision-making. Decisions of scientific content will have greater support if they are reached through collaborative,

broadly based, integrated, and iterative analytic-deliberative processes that involve both the agency and the public.

There are several well-developed processes for encouraging public participation in public-lands decision-making and management. To reduce conflict and improve the transparency and quality of decisions, the committee suggests using the analytic-deliberative approach to public participation. Participatory decision-making processes foster the development of a shared understanding of the ecosystem, an appreciation for others' viewpoints, and the development of good working relationships. **Thus, BLM should engage with the public in ways that allow public input to influence agency decisions, develop an iterative process between public deliberation and scientific discovery, and codesign the participatory process with representatives of the public.** Finding ways to involve citizens in data-gathering or other scientific practices may help to build relationships and understanding. Because there are also concerns about horses and burros among the national—not just the local and regional—public, it would be appropriate for BLM to support research that uses survey methods that go beyond opinion polls to capture tradeoffs in public concerns to improve understanding of perceptions, values, and preferences regarding horse and burro management, as was recommended by the National Research Council in 1980 and 1982.

FINDING: Tools already exist for BLM to use in addressing challenges faced by its Wild Horse and Burro Program.

The continuation of “business-as-usual” practices will be expensive and unproductive for BLM. Because compelling evidence exists that there are more horses on public rangelands than reported at the national level and that horse population growth rates are high, unmanaged populations would probably double in about 4 years. If populations were not actively managed for even a short time, the abundance of horses on public rangelands would increase until animals became food-limited. Food-limited horse populations would affect forage and water resources for all other animals on shared rangelands and potentially conflict with the multiple-use policy of public rangelands and the legislative mandate to maintain a thriving natural ecological balance. Fertility-control agents have been pursued to enhance efficacy of population management, with the potential to reduce population growth rates and hence the number of animals added to the national population each year. The potential effects of fertility control, however, are limited by the number and proportion of animals that must be effectively treated with contraceptive agents. The committee's conclusions that there are considerably more horses and possibly burros on public lands than reported and that population growth rates are high suggest that the effects of fertility intervention, although potentially substantial, may not completely alleviate the challenges BLM faces in the future in effectively managing the nation's free-ranging equid populations, given legislative and budgetary constraints.

However, the tools already exist for BLM to address many challenges. Given the nature of the situation, a satisfactory resolution will take time, resources, and dedication to a combination of strategies underpinned by science. In the short term, intensive management of free-ranging horses and burros would be expensive, but addressing the problem immediately with a long-term view is probably a more affordable and satisfactory answer than continuing to remove animals to long-term holding facilities. Investing in science-based management approaches would not solve the problem instantly, but it could lead the Wild Horse and Burro Program to a more financially sustainable path that manages healthy horses and burros with greater public confidence.

1

Free-Ranging Horses and Burros in the Western United States

Since 1971, the Bureau of Land Management (BLM) of the U.S. Department of the Interior has been responsible for managing the majority of free-ranging horses and burros on arid federal public lands in the western United States. In the Wild Free-Roaming Horses and Burros Act of 1971 (P.L. 92-195), the U.S. Congress charged BLM¹ with the “protection, management, and control of wild free-roaming horses and burros on public lands.” BLM was charged to protect the equids because, the legislation noted, “wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West . . . and [they] are fast disappearing from the American scene.” In the mid-20th century, horse and burro populations were affected by competing uses for the land, including livestock grazing, and by roundups, from which the animals were often sold for slaughter (GAO, 1990). The protection provided in the 1971 legislation built on the “Wild Horse Annie Act” (P.L. 86-234), passed in 1959, which prohibited the use of motorized vehicles, including aircraft, to hunt free-ranging horses and outlawed the poisoning of watering holes on public lands.

The agency was also tasked with managing and controlling the population because of the multiple uses of public lands. Public lands provide habitat to horses and burros, but they are also used for recreation, mining, forestry, grazing for livestock, and habitat for wildlife, including mule deer, pronghorn, and bighorn sheep. Therefore, although the act stipulated that free-ranging horses and burros were “an integral part of the natural system of the public lands” and were to be managed “as components of the public lands,” it limited their range by definition to “their known territorial limits” in 1971. Such public lands were to be “devoted principally but not exclusively to [horse and burro] welfare in keeping with the multiple-use management concept of public lands.” In addition, horses and burros were to be managed at “the minimal feasible level.” Management should “achieve and maintain

¹The Wild Free-Roaming Horses and Burros Act of 1971 also pertains to free-ranging horses and burros found on public lands administered by the U.S. Forest Service. This report focuses on animals managed by BLM, which is responsible for over 90 percent of the equid population on public lands in the western United States (GAO, 2008).

a thriving natural ecological balance on the public lands,” protect wildlife habitat, and prevent range deterioration.

The goal of protecting free-ranging horses and burros while managing and controlling them to achieve a vaguely defined thriving natural ecological balance within the multiple-use mandate for public lands has challenged BLM’s Wild Horse and Burro Program since its inception. Amendments to the Wild Free-Roaming Horses and Burros Act have not diminished the difficulty. BLM is to monitor the population size to determine where there is an excess of horses and burros; such a situation is to be identified when “a thriving natural ecological balance and multiple-use relationship” is threatened (P.L. 92-195 as amended by the Public Rangelands Improvement Act of 1978, P.L. 95-514). It is BLM’s responsibility to determine when that relationship is under threat and to remove animals to achieve balance. The legislation allows the destruction of old, sick, or lame animals. Excess animals removed from the range may be adopted. Those for which there is no adoption demand are to be “destroyed in the most humane and cost efficient manner possible”; however, the destruction of healthy, unadopted free-ranging horses and burros has been restricted either by a moratorium instituted by the director of BLM or by the annual congressional appropriations bill for the Department of the Interior in most years. Free-ranging horses and burros have successfully sustained populations in North America for over 300 years, and no large predator widely overlaps with their territory. Since 1989, adoptions have seldom exceeded the number of animals removed from the range; in the 2000s, the discrepancy neared a 2:1 ratio of animals removed to animals adopted (GAO, 2008). Thus, BLM’s effort to control horse and burro numbers by removing animals from the range has led to the stockpiling of “excess” horses and burros in holding facilities (Figures 1-1 and 1-2). In fiscal year 2012, more than 45,000 animals were in holding facilities, and their maintenance consumed almost 60 percent of the Wild Horse and Burro Program’s budget (BLM, 2012a).

With holding costs in 2010 projected to nearly double those in 2004 (Bolstad, 2011), the U.S. Senate Committee on Appropriations in 2009 instructed BLM to “prepare and publish a new comprehensive long-term plan and policy for management of wild horses and burros” (U.S. Congress, Senate, 2009). BLM responded with a proposed strategy designed around seven topics. With respect to science and research, one method for improving the use of science in its management of horses and burros was to “commission the [National Academy of Sciences] to review earlier reports and make recommendations on how the BLM should proceed in light of the latest scientific research” (BLM, 2011a).

COMMITTEE CHARGE AND APPROACH

The committee formed by the National Research Council of the National Academy of Sciences in response to BLM’s request was given a long statement of task that required a variety of expertise (Box 1-1). The charge called on the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program to investigate the annual rates of growth in the animal populations, the implications of genetic diversity for their long-term health, and how they interact with the environment. It also asked the committee to assess the effects of management actions, such as treating animals with contraceptives or removing animals from the range, and to evaluate BLM’s tools for measuring the effects. Agency methods for determining the number of animals living on the range and the number of animals appropriate for the range were also to be examined. Finally, the committee was tasked to identify options that could address stakeholder concerns making use of the best available science.

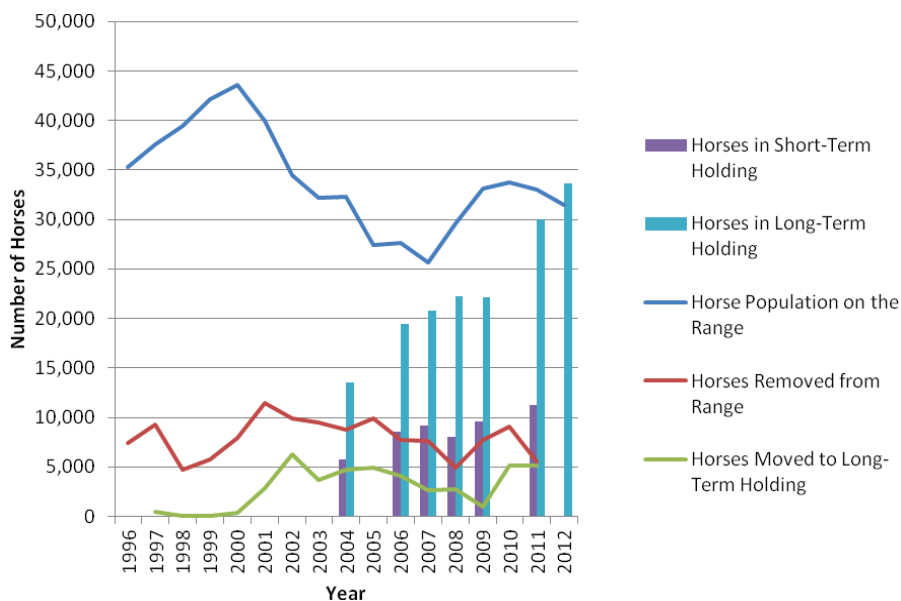


FIGURE 1-1 Horse population reported by the Bureau of Land Management (BLM), horses removed from the range, and horses in holding facilities, 1996-2012 (for years available).

DATA SOURCE: Horse population data from BLM (1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2005a,b, 2006a, 2007a, 2008a, 2009a, 2010, 2011b, 2012b); horse removal data provided by BLM; holding-facilities data from BLM (2004, 2006b, 2007b, 2008b, 2009b, 2011c, 2012c).

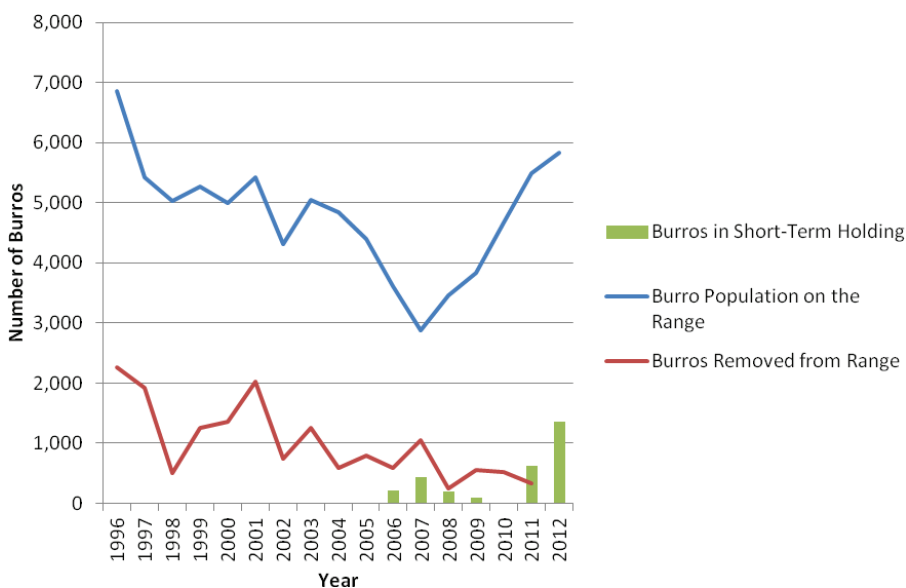


FIGURE 1-2 Burro population reported by the Bureau of Land Management (BLM), burros removed from the range, and burros in short-term holding facilities, 1996-2012 (for years available).

NOTE: There are no long-term holding facilities for burros.

DATA SOURCE: Burro population data from BLM (1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2005a,b, 2006a, 2007a, 2008a, 2009a, 2010, 2011b, 2012b); burro removal data provided by BLM; holding-facilities data from BLM (2004, 2006b, 2007b, 2008b, 2009b, 2011c, 2012c).

BOX 1-1 Statement of Task

At the request of the Bureau of Land Management (BLM), the National Research Council (NRC) will conduct an independent, technical evaluation of the science, methodology, and technical decision-making approaches of the Wild Horse and Burro Management Program. In evaluating the program, the study will build on findings of three prior reports prepared by the NRC in 1980, 1982, and 1991 and summarize additional, relevant research completed since the three earlier reports were prepared. Relying on information about the program provided by BLM and on field data collected by BLM and others, the analysis will address the following key scientific challenges and questions:

1. Estimates of the wild horse and burro populations: Given available information and methods, how accurately can wild horse and burro populations on BLM land designated for wild horse and burro use be estimated? What are the most accurate methods to estimate wild horse and burro herd numbers and what is the margin of error in those methods? Are there better techniques than BLM currently uses to estimate population numbers? For example, could genetics or remote sensing using unmanned aircraft be used to estimate wild horse and burro population size and distribution?
2. Population modeling: Evaluate the strengths and limitations of models for predicting impacts on wild horse populations given various stochastic factors and management alternatives. What types of decisions are most appropriately supported using the WinEquus model? Are there additional models BLM should consider for future uses?
3. Genetic diversity in wild horse and burro herds: What does information available on wild horse and burro herds' genetic diversity indicate about long-term herd health, from a biological and genetic perspective? Is there an optimal level of genetic diversity within a herd to manage for? What management actions can be undertaken to achieve an optimal level of genetic diversity if it is too low?
4. Annual rates of wild horse and burro population growth: Evaluate estimates of the annual rates of increase in wild horse and burro herds, including factors affecting the accuracy of and uncertainty related to the estimates. Is there compensatory reproduction as a result of population-size control (e.g., fertility control or removal from herd management areas)? Would wild horse and burro populations self-limit if they were not controlled, and if so, what indicators (rangeland condition, animal condition, health, etc.) would be present at the point of self-limitation?

To accomplish the committee's comprehensive charge, members were appointed on the basis of their scientific research and experience with the questions involved in the statement of task. Experts were selected from the fields of behavioral ecology, conservation biology, genetics, natural-resources management and range ecology, population ecology, reproductive physiology, sociology, veterinary medicine, and wildlife ecology. (The committee members' biographies are in Appendix A.) The committee also retained a consultant who had expertise in equine reproduction.

The committee's study was the first examination of BLM's Wild Horse and Burro Program by the National Research Council in over 20 years. The National Research Council had published three reports on free-ranging horses and burros under BLM's jurisdiction. The first two reports, *Wild and Free-Roaming Horses and Burros: Current Knowledge and Recommended Research, Phase I Final Report* (1980) and *Wild and Free-Roaming Horses and Burros: Final Report* (1982), completed the first and third phases of a three-phase study mandated

5. Predator impact on wild horse and burro population growth: Evaluate information relative to the abundance of predators and their impact on wild horse and burro populations. Although predator management is the responsibility of the U.S. Fish and Wildlife Service or State wildlife agencies and given the constraints in existing federal law, is there evidence that predators alone could effectively control wild horse and burro population size on BLM land designated for wild horse and burro use?
6. Population control: What scientific factors should be considered when making population control decisions (roundups, fertility control, sterilization of either males or females, sex ratio adjustments to favor males, and other population control measures) relative to the effectiveness of control approach, herd health, genetic diversity, social behavior, and animal well-being?
7. Fertility control of wild horses: Evaluate information related to the effectiveness of fertility control methods to prevent pregnancies and reduce herd populations.
8. Managing a portion of a population as nonreproducing: What scientific and technical factors should BLM consider when managing for wild horse and burro herds with a reproducing and nonreproducing population of animals (i.e., a portion of the population is a breeding population and the remainder is nonreproducing males or females)? When managing a herd with reproducing and nonreproducing animals, which options should be considered: geldings, vasectomized males, ovariectomized mares, or other interventions? Is there credible evidence to indicate that geldings or vasectomized stallions in a herd would be effective in decreasing annual population growth rates, or are there other methods BLM should consider for managing stallions in a herd that would be effective in tangibly suppressing population growth?
9. Appropriate Management Level (AML) establishment or adjustment: Evaluate BLM's approach to establishing or adjusting AML as described in the 4700-1 *Wild Horses and Burros Management Handbook*. Based upon scientific and technical considerations, are there other approaches to establishing or adjusting AML BLM should consider? How might BLM improve its ability to validate AML?
10. Societal considerations: What are some options available to BLM to address the widely divergent and conflicting perspectives about wild horse and burro management and to consider stakeholder concerns while using the best available science to protect land and animal health?
11. Additional research needs: Identify research needs and opportunities related to the topics listed above. What research should be the highest priority for BLM to fill information and data gaps, reduce uncertainty, and improve decision-making and management?

by Congress in the Public Rangelands Improvement Act of 1978 (P.L. 95-514).² Those reports were the product of one study committee, the Committee on Wild and Free-Roaming Horses and Burros, which was convened from 1979 to 1982. The third report, *Wild Horse Populations: Field Studies in Genetics and Fertility* (1991), was undertaken by a separate committee, the Committee on Wild Horse and Burro Research, in accordance with congressional appropriations in fiscal year 1985 to fund another study. The Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program was asked to build on the findings in those three reports. Appendix B contains a summary of findings of the earlier studies that overlap with the statement of task for the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program.

²The second phase of the study consisted of research projects recommended by the committee in its first report.

Six information-gathering meetings took place during the study process (Appendix C). In addition to a presentation from BLM, the committee heard from experts in fertility control, predation, behavioral ecology, and genetics of free-ranging horses and burros. It also received presentations of research on free-ranging horses and burros by the U.S. Geological Survey and the U.S. Fish and Wildlife Service, on the use of adaptive management to address natural-resources issues, on tools for communicating science effectively, and on methods for engaging the public in assessment and decision-making on scientific issues. The committee heard from many interested parties at four public-comment sessions and received numerous written submissions on research and stakeholder concerns related to free-ranging horses and burros and to BLM's management of the animals (Box 1-2).

The committee based its findings and conclusions on a number of sources. In addition to the information gathered at its meetings, committee members examined peer-reviewed scientific literature on free-ranging horses and burros, particularly literature published since the previous National Research Council reports were completed. The committee analyzed data on free-ranging horse and burro populations and genetics that it received from BLM and from E. Gus Cothran of Texas A&M University, respectively, in response to submitted inquiries (Appendix D). It also synthesized responses from BLM, Stephen Jenkins, and Charles de Seve regarding population modeling and from BLM on establishing herd population levels. When it was relevant, the committee also consulted gray and unpublished literature to inform its analysis.

BOX 1-2
Divergent Opinions on Appropriate Management
of Free-Ranging Horses and Burros

The management of free-ranging horses and burros on public lands is a long-standing source of contention among stakeholder groups. During the course of its review, the committee heard from BLM and from many interested parties about the struggle of managing horses and burros in accordance with a thriving natural ecological balance and the multiple-use mandate. The intent of the Wild Free-Roaming Horses and Burros Act was interpreted differently by various stakeholders, and many critiques of BLM's implementation of the law were offered.

In a presentation to the committee, BLM outlined its mandate under the current law. Among the law's stipulations are that animals are to be managed on land on which they were found in 1971, the land is to be managed for multiple uses, and excess animals are to be removed immediately if appropriate management levels are exceeded.

Some parties who participated in public-comment sessions expressed concern that rangeland health was adversely affected because the population of horses and burros often exceeded appropriate management levels. This perspective considered competition between equids and wildlife to be detrimental to wildlife. It was also pointed out that livestock, which have grazing rights on public lands, do not remain on the land all year, unlike horses.

Other participants in the public sessions of committee meetings communicated that horses and burros were unfairly limited in their range and in their numbers. From that point of view, appropriate management levels were too low to maintain genetically healthy herds, and horses and burros were restricted to too few acres of public land. For example, the number of acres on which livestock are allowed is much greater than that of the Herd Management Areas (the land allocated to horses and burros). Many participants asserted that the horse is a reintroduced wildlife species and fills a niche in its ecosystem. Concern was also expressed about the stress placed on animals during gathers (roundups) and in holding. There were many requests for BLM to provide more robust and transparent evidence to support its management decisions.

Most commenters agreed that the operation of the program was excessively expensive and that management could be improved to reduce costs and increase the welfare of all animals on the range.

BOX 1-3**Describing Horses and Burros Under Different Management Regimes**

In the literature that the committee reviewed, there were many nuances regarding the management regimes of horse and burro populations and other animals. To clarify the differences, the committee defines the terms that are used in the report here.

Free-Ranging. Although the 1971 legislation calls horses and burros in the western United States *free-roaming*, the committee chose to use the term *free-ranging* to reflect the purposeful and spatially adaptive uses of the rangelands that the horses and burros inhabit. Such populations are allowed to use spatially extensive habitats in ways that increase access to forage, improve their physiological condition, and increase the probability of their own and their population's viability. (In many of the contraceptive studies reviewed by the committee, treatments were applied to free-ranging horses that had been gathered from the range and held captive for study.)

Semi-Free-Ranging. The committee uses this term to refer to populations of horses and burros that are confined to limited areas, for example, in fenced reserves or protected areas that are nevertheless expansive enough for the animals to move freely over larger areas than typical farms or ranches.

Domestic. For the purposes of the report, *domestic* describes an animal that is kept by humans, typically as a companion animal or as livestock. This is different from definitions based on presumed inherited effects of domestication in ancestral bloodlines. The report terminology distinguishes between domestic donkeys and free-ranging burros.

The committee did not limit itself to research and data on free-ranging horses and burros in the western United States. It also consulted studies on free-ranging horses and burros on the barrier islands off the East Coast of the United States, particularly the herds on Assateague Island and Shackleford Banks.³ Those populations are not under BLM management and are not subject to the Wild Free-Roaming Horses and Burros Act of 1971, but results of research on the herds, which in many cases have been studied much more often and thoroughly than BLM herds, were relevant to the conclusions drawn by the committee. Germane studies of the biology, physiology, and behavioral ecology of domestic horses and burros, Przewalski's horses (wild horses native to central Asia), free-ranging horse and burro populations in other countries, native equid species on other continents, and free-ranging ungulates in the United States and elsewhere were also assessed (Box 1-3).

BOUNDS OF THE STUDY

The committee's statement of task was extensive but did not encompass all issues and challenges pertaining to the Wild Horse and Burro Program. The committee's tasks pertained to management issues related to horses and burros *on the range*. It was not asked to examine BLM procedures and actions related to gathers—the roundups that BLM conducts to administer such management actions as adjusting sex ratios on the range, treating animals with contraceptives, and removing animals from the range. The committee's tasks did not include investigation of the effects of gathers on the welfare of gathered horses and

³Several free-ranging horse and burro herds are resident on barrier islands off the East Coast of the United States and Canada. The herds on Assateague Island (Maryland) and Shackleford Banks (North Carolina) are managed by the U.S. Department of the Interior's National Park Service (NPS). There are free-ranging equid populations in the United States that are not under the jurisdiction of BLM. Some are managed by other federal agencies, such as NPS and the U.S. Fish and Wildlife Service; Indian reservations, state agencies, and local entities are also responsible for some herds.

burros. The welfare of animals in holding facilities or of animals that leave the program through adoption or sale was also not part of the study's charge. A critique of the legal framework under which the horses and burros are managed (including the number of acres on which BLM manages the animals), an examination of BLM's legal authority to use euthanasia, and specific recommendations for program budget allocations were similarly not within the scope of the study.

The committee was not tasked with examining issues within BLM that may affect how the Wild Horse and Burro Program functions. One example is related to livestock grazing. The agency's multiple-use mandate includes administering grazing allotments on public lands to private owners of livestock. Whether livestock or equids do or should receive preferential treatment by BLM when rangeland is allocated or when the number of animals on the range is adjusted to keep rangelands healthy was not within the study's scope. Another example is BLM's internal organizational structure. The committee was not asked to examine how the organizational hierarchy of national, state, and field offices and the responsibilities of and working relationships between these levels pertain to BLM's effectiveness in managing horses and burros.

In addition, as became evident from public comments at information-gathering sessions and submitted written comments, the statement of task did not include questions that are of concern to many stakeholders. The study did not investigate such topics as the relevance of the evolutionary origin of the horse species in North America and the logistical and economic feasibility of establishing ecosanctuaries for horses and burros. The study did not examine the procedures that BLM uses to gather horses and burros, so it did not explore whether alternative methods of gathering equids could be used. Furthermore, the report does not comment on whether the number of free-ranging horses and burros deemed appropriate by BLM or the area of range available to equids should be increased or decreased.

As a committee established under the auspices of the National Research Council, the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program was constituted to answer science-based questions. Although the answers to science-based questions inform policy decisions, it is the role of decision-makers to weigh the values associated with the possible outcomes of management actions. National Research Council committees are also not constituted to be bodies of legal review or critique.

Therefore, many of the questions alluded to above were not within the prerogative of the committee. Horses and burros removed from the range by culling or by gathering and moving them to long-term holding facilities are not managed on the range and thus were not within the committee's statement of task. The report's findings on the effects of population control on herd health, genetic diversity, and social behavior (Chapters 4 and 5) would apply to horses and burros remaining on the range if a herd were culled; in contrast, policy decisions to cull on or near the range or to remove animals to long-term holding facilities permanently to control animal populations are value judgments. Similarly, the answers to questions related to the numbers of animals of any species on the range are determined by the public's values, both economic and emotional, concerning not only equids but livestock, wildlife, rangeland conditions, and other natural resources. Science can inform what effects different combinations of species and population levels may have on the range, but science cannot say what decisions *should* be made.

Acts of Congress are policy decisions. The committee recognized that a complicated legal framework affects how free-ranging horses and burros are managed and that the complexity of the framework may create an impediment to effective management. However, it is the role of members of Congress, as representatives of their constituents, to promulgate

or amend laws. In the report, the committee commented only by way of description on the legal framework under which horses and burros are managed.

Because of the existing legal framework that protected horses and burros at the time of the study, the committee did not investigate whether the horse should be considered a reintroduced species because of its evolution in North America. Previous National Research Council reports (NRC, 1980, 1982) examined the question and reported that the dearth of information regarding changes in the horse, *Equus caballus*, since domestication, which occurred after the species crossed the land bridge into Eurasia, and changes in the environment and the complex of species in North America since the Pleistocene epoch,⁴ when *E. caballus* inhabited the continent, made the designation of the horse as a reintroduced species difficult to assess. Discoveries about the evolutionary and genetic history of the horse have been made since those reports (see Weinstock et al., 2005), but uncertainty remains regarding the degree of similarity or change in the morphology and behavior between modern horses and ancestral horses from Pleistocene North America. In the context of the committee's study, free-ranging horses and burros under BLM management, whether or not they are considered a species reintroduced into North America, are protected by the Wild Free-Roaming Horses and Burros Act and therefore have the protection stipulated in the law, that is, to their known territorial limits as of 1971.

Regarding evaluations of gather techniques, the effects of gathers on horses and burros, and the condition of animals placed in long-term holding facilities, such a study would be better conducted by a committee specifically constituted with the expertise to assess animal welfare. The treatment of animals during gathers and in holding facilities has been studied by the Government Accountability Office (2008) and by a task force of the American Association of Equine Practitioners (2011). Investigating the circumstances of animals that leave the program through sale or adoption is more appropriate for a body that has auditing authority. The committee was not asked to assess the viability of ecosanctuaries, so such expertise was not included in the committee's makeup.

Though the committee did not address the aforementioned issues directly, it recognized that increasing costs of gathering animals and holding them indefinitely drove Congress to ask BLM to develop a long-term plan for managing free-ranging horses and burros. The committee was also aware that concerns for animals gathered and placed in holding facilities or released from the program through adoption or sale cause much of the stakeholder frustration with the Wild Horse and Burro Program. In fulfilling its statement of task, which sets forth how BLM can use science to improve management of animals on the range, the committee had the goal in this report to provide BLM with tools that could help the agency to decrease the use of and spending on contentious practices and to manage healthy populations on the range.

STATUS OF FREE-RANGING HORSES AND BURROS UNDER BUREAU OF LAND MANAGEMENT JURISDICTION

At the time the committee conducted its review, BLM reported that 31,453 horses and 5,841 burros were on the range (BLM, 2012b). The animals live on Herd Management Areas (HMAs),⁵ rangeland that they inhabited in 1971 and that BLM has found to have adequate forage, water, cover, and space to support them. In 2012, there were 179 HMAs, 171 of which contained equids. Figure 1-3 shows HMAs designated by BLM for use by horses, burros, or

⁴The Pleistocene epoch ended 11,700 years before the present.

⁵U.S. Forest Service herd areas are referred to as Wild Horse (or Burro) Territories.

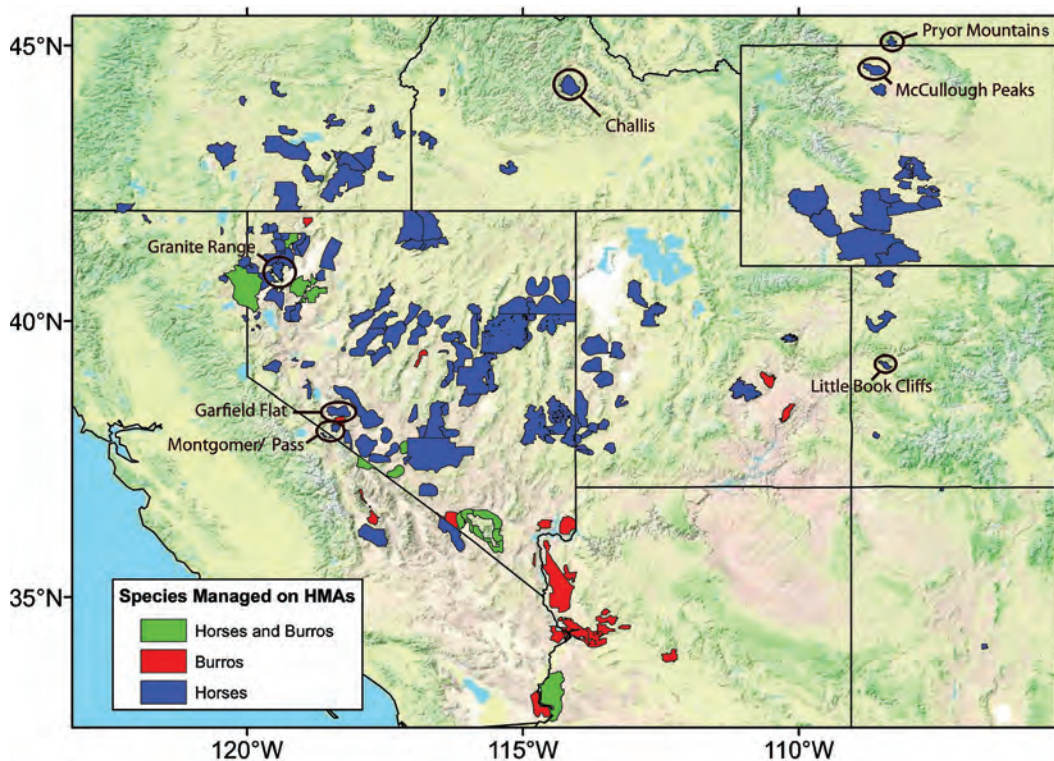


FIGURE 1-3 Herd Management Areas (HMAs) in 2012.

NOTE: The HMAs are categorized by the species that the Bureau of Land Management (BLM) manages in an area. Burros may live in some HMAs that are managed only for horses and vice versa. HMAs discussed often in the report are circled on the map.

DATA SOURCE: Mapping data provided by BLM. Species data from BLM (2012b).

both. Recognizing that the proximity of some HMAs to one another allows animals to move from one HMA to another, BLM began to manage some groups of HMAs as complexes, or larger units, in the late 2000s. In 2012, 93 HMAs were parts of complexes (Figure 1-4).

HMAs are in 10 states; almost half the 179 are in Nevada (Table 1-1). BLM reported in 2012 that almost 60 percent of the free-ranging horse population was in Nevada, followed by Wyoming and Utah, at 11 and 10 percent, respectively. Over 50 percent of the burros on the range were in Arizona and 25 percent were in Nevada (Figure 1-5).

As required by the Wild Free-Roaming Horses and Burros Act (as amended), BLM sets an appropriate management level (AML) for each HMA, the numeric population range at which the agency has determined a herd can be maintained in healthy condition without adversely affecting a thriving natural ecological balance. When establishing an AML, BLM must also consider other federal acts pertaining to public lands, including the Federal Land Policy and Management Act of 1976 (P.L. 94-579), the Wilderness Act of 1964 (P.L. 88-577), the National Historic Preservation Act of 1966 (P.L. 89-665), the Clean Water Act of 1972 (P.L. 92-500), the Endangered Species Act of 1973 (P.L. 93-205), and the Forest and Rangeland Renewable Resources Planning Act of 1974 (P.L. 93-378). The requirements of these acts as

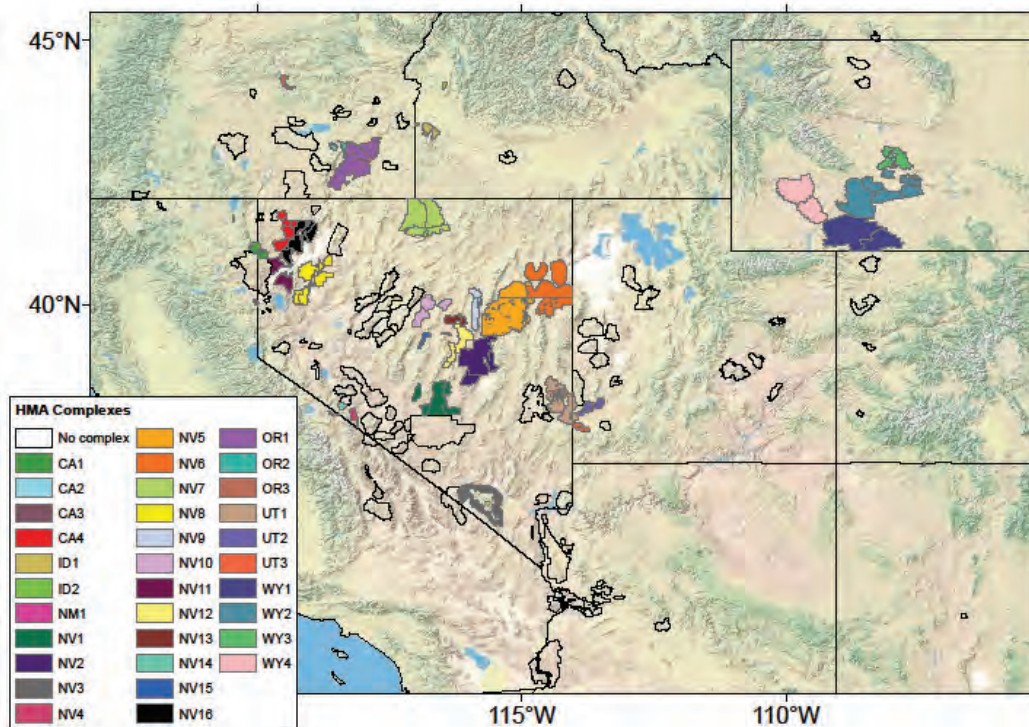


FIGURE 1-4 Herd Management Areas (HMAs) managed together or with Wild Horse or Burro Territories as complexes.

NOTE: Blank HMAs are not managed as part of a complex. The complex codes in the legend correspond to the following HMAs:

- CA1 Buckhorn, Coppersmith
- CA2 Round Mountain (managed by the U.S. Forest Service with the Devil's Garden Plateau Wild Horse Territory)
- CA3 Fort Sage (California), Fort Sage (Nevada)
- CA4 High Rock, Nut Mountain, Wall Canyon, Bitner, Fox Hog
- ID1 Black Mountain, Hard Trigger
- ID2 Four Mile (Idaho), Sand Basin
- NM1 Carracas Mesa (managed by the U.S. Forest Service)
- NV1 Stone Cabin, Saulsbury, Hot Creek, Reveille (managed by the Bureau of Land Management with Monitor Wild Horse Territory)
- NV2 Pancake, Sand Springs West (managed by the Bureau of Land Management with Monte Cristo Wild Horse Territory)
- NV3 Johnnie, Red Rocks, Wheeler Pass (managed by the Bureau of Land Management with Spring Mountain Wild Horse Territory)
- NV4 Fish Lake Valley (managed by the Bureau of Land Management with U.S. Forest Service Wild Horse Territory)
- NV5 Triple B, Maverick-Medicine (managed by the Bureau of Land Management with Cherry Springs Wild Horse Territory)
- NV6 Antelope, Antelope Valley, Goshute, Spruce-Pequop
- NV7 Owyhee, Little Owyhee, Little Humboldt, Rock Creek, Snowstorm Mountain

Figure caption continues

FIGURE 1-4 Continued

NV8	Blue Wing Mountains, Seven Troughs, Lava Beds, Nightingale Mountains, Kamma Mountains, Shawave Mountains
NV9	Diamond, Diamond Hills North, Diamond Hills South
NV10	Callaghan, Rocky Hills, Bald Mountain
NV11	Buffalo Hills, Fox-Lake Range
NV12	Seven Mile, Fish Creek, Little Fish Lake, North Monitor (managed with Butler Basin and Little Fish Lake Wild Horse Territories)
NV13	Roberts Mountain, Whistler Mountain
NV14	Montgomery Pass (managed by the U.S. Forest Service)
NV15	Hickison Summit (managed by the U.S. Forest Service with the Hickison Wild Burro Territory)
NV16	Calico Mountains, Black Rock East, Black Rock West, Granite Range, Warm Springs Canyon
OR1	Coyote Lake, Alvord Tule Springs, Sand Springs, Sheepshead/Heath Creek
OR2	Kiger, Riddle Mountain
OR3	Murderer's Creek (managed by the U.S. Forest Service with Murderer's Creek Wild Horse Territory)
UT1	Choke Cherry (Utah), Mt. Elinor (Utah), Eagle (Nevada)
UT2	Bible Springs, Four Mile (Utah), Tilly Creek
UT3	North Hills (managed by the Bureau of Land Management with the North Hills Wild Horse Territory)
WY1	Adobe Town, Salt Wells Creek
WY2	Divide Basin, Lost Creek, Stewart Creek, Antelope Hills, Green Mountain, Crooks Mountain
WY3	Dishpan Butte, Muskrat Basin, Conant Creek, Rock Creek Mountain
WY4	White Mountain, Little Colorado

DATA SOURCE: Mapping data and complex information provided by the Bureau of Land Management.

TABLE 1-1 Herd Management Areas, by State, 2012

State	Number of Herd Management Areas	Number of Herd Management Areas with Free-Ranging Equids
Arizona	7	7
California	21	19
Colorado	4	4
Idaho	6	6
Montana	1	1
Nevada	85	79
New Mexico	2	2
Oregon	18	18
Utah	19	19
Wyoming	16	16
Total	179	171

SOURCE: Bureau of Land Management (2012b).

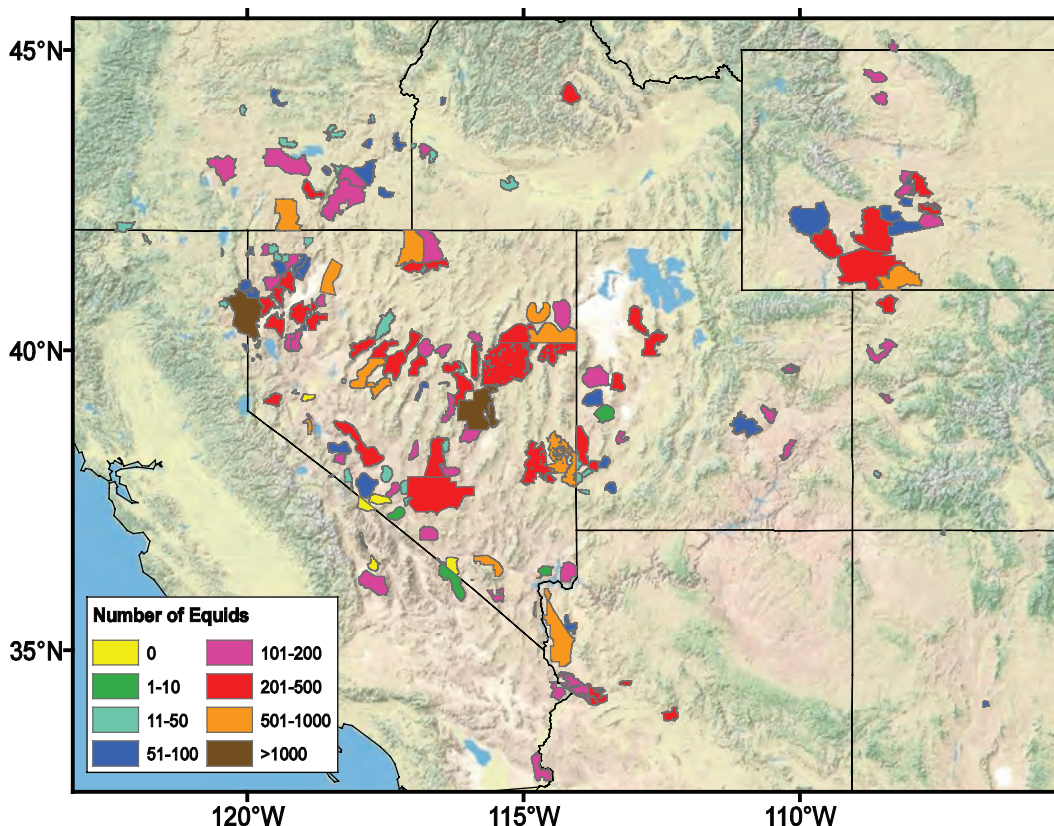


FIGURE 1-5 Number of equids reported by the Bureau of Land Management (BLM) for each Herd Management Area in 2012.

DATA SOURCE: Mapping data provided by BLM. Population data from BLM (2012b).

they pertain to free-ranging horse and burro management are discussed in Chapter 7 (see section “The History of Appropriate Management Levels”).

Table 1-2 shows the upper bounds of AMLs and the estimated population of each species in each state. Often, when populations exceed the upper bound of AML, BLM conducts a gather. After a gather, a healthy animal may be released back to the range, released back to the range after being gelded or treated with a contraceptive, or removed to a short-term holding facility. Animals removed from the range may be put up for adoption.⁶ An animal that is not adopted is ultimately moved to a long-term holding facility, where it remains. In 2010, BLM removed 9,042 animals from the range (BLM, email communication, December 11, 2011). As of September 2012, it held 14,238 animals in short-term holding facilities and 33,623 in long-term holding facilities (BLM, 2012c).

⁶At times during the lifetime of the law, BLM has had the authority to sell animals without limitation. During 2005-2010, it sold roughly 650 animals a year (Bolstad, 2011). At the time the study was conducted, BLM had authority to sell animals, although legislation to remove the authority had been proposed.

TABLE 1-2 Upper Limits of Appropriate Management Levels and Population Estimates of Horses and Burros by State, 2012

State	Appropriate Management Levels		Population Estimates	
	Horse	Burro	Horse	Burro
Arizona	240	1,436	502	3,194
California	1,585	478	1,965	939
Colorado	812	0	967	0
Idaho	617	0	640	0
Montana	120	0	170	0
Nevada	11,964	814	18,425	1,456
New Mexico	83	0	108	0
Oregon	2,690	25	2,093	35
Utah	1,786	170	3,040	217
Wyoming	3,725	0	3,543	0
Total	23,622	2,923	31,453	5,841

SOURCE: Bureau of Land Management (2012b).

ORGANIZATION OF THE REPORT

Because a thorough review of the literature on horse and burro biology was conducted in the 1980 National Research Council report, this report begins with questions pertinent to the statement of task. Information from the 1980 report on the social organization of free-ranging horses and burros is summarized briefly in Box 1-4, and equid life history is explained further in later chapters. Although burros are discussed in this report, the management of horses is featured more comprehensively as more studies have been conducted on free-ranging horses than on burros. Also, at the time this report was published, BLM estimated that it managed over 30,000 horses and fewer than 6,000 burros on the range. Thus, the committee inferred that managing horses was the more pressing issue for BLM and that its review should devote more attention to horses than to burros.

Successful management of horses and burros requires knowing how many animals live on the range. BLM often receives criticism about the validity of the reported number of animals and therefore asked the committee to review its methods for estimating the size of the population of free-ranging horses and burros under its jurisdiction. The committee was also charged with evaluating the estimated population growth rate that BLM uses, another issue that is highly contentious between some stakeholders and BLM. Chapter 2 analyzes data provided to the committee by BLM and reviews the literature on population survey techniques to address this task.

Population processes, such as population growth and self-limitation, affect population size. They can be influenced by the density of a population or by independent factors, such as climate or, in the case of free-ranging horses and burros, management decisions. Chapter 3 examines how density-dependent and density-independent factors and management actions may affect the population processes of free-ranging horses and burros. Changes in the size of a population due to density, climate, predation, and management actions are specifically studied.

BLM has used the contraceptive porcine zona pellucida in mares since 2004, but it has been administered to so few animals that it has had no effect on population size. Since the earlier National Research Council reports were published (NRC, 1980, 1982,

BOX 1-4
Social Organization of Free-Ranging Equids

Equids organize themselves socially in a variety of forms. Two dominant forms are harem organization and territorial organization. A harem, also known as a band, consists of a dominant stallion, subordinate adult males and females, and offspring. The group is strongly bonded, although bands are not entirely stable. Typically, adults in the group are not close genetic relatives. Movement among bands is not uncommon; it often occurs when a stallion is displaced, when a stallion defeats a competitor for a mare, or when females reach maturity. Harem organization is common in free-ranging horses; an average band size is five animals. Occasionally, bands come together to form temporary aggregations or herds. In territorial organization, a male typically defends a territory and mates with females that enter the area. The mother-offspring relationship is the only stable bond. Burros typically display this form of social organization. Temporary groups of bachelor males exist in both organization patterns.

1991), considerable progress has been made in developing and testing fertility control for wild animal populations, both free-ranging and captive. Chapter 4 investigates the fertility-control options for mares and stallions that are available to BLM. The on-the-range feasibility and efficacy of each method is assessed, and the effect of potential widespread application of these methods on population processes is evaluated.

Chapter 5 summarizes the research on genetic diversity in free-ranging horse and burro populations in the western United States. Much work has been conducted since the earlier National Research Council reports were published, and genetic-testing capabilities have advanced. The chapter examines the relevance of genetic diversity to long-term herd health of ungulates in general and of free-ranging horses and burros in particular. It presents methods for maintaining healthy levels of genetic diversity. It also reviews the science on the minimum population size needed for viability and explores the different ways in which free-ranging horse and burro populations could be managed for genetic diversity, for example: In terms of genetics, should a population be defined as the animals on an HMA, the animals on an HMA complex, or the entire population of free-ranging horses or burros?

Anticipating the effects of a management action can help decision-makers to select the most efficient and productive course of action when managing animal populations. Chapter 6 reviews population models that are or could be used by BLM to project the effects of management actions (such as removals from the range, contraceptive treatments, and changes in the sex ratio) on the population dynamics of a herd or a larger population. The components necessary for a modeling framework that would comprehensively address the Wild Horse and Burro Program's challenges are detailed.

The Wild Free-Roaming Horses and Burros Act charges BLM with establishing AMLs and managing populations to protect and restore a thriving natural ecological balance of all wildlife species, particularly endangered species, and to protect rangelands from deterioration. The agency must also consider the capacity of an area to support equids in a healthy condition and the multiple-use objective of BLM management when determining AMLs. In Chapter 7, the committee examines the process that BLM has designed for establishing and adjusting AMLs, as published in its *Wild Horses and Burros Management Handbook* in June 2010. The chapter also reviews alternative approaches that BLM might use to set and validate AMLs.

As alluded to in Box 1-2, there are strong and often divergent stakeholder opinions regarding the management of horses and burros, and BLM has often been criticized for its procedures by parties holding conflicting opinions and values. Chapter 8 explores ways in which BLM can use participatory approaches to find greater convergence on management objectives and actions that use the best science available. The issue of the horse as native to North America is also addressed in the chapter.

Chapter 9 uses the report's findings to suggest a sustainable path forward for the Wild Horse and Burro Program built on scientific research.

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2

Estimating Population Size and Growth Rates

Understanding the number and distribution of free-ranging horses and burros on their range is explicitly part of the mandate to the Bureau of Land Management (BLM) in the Wild Free-Roaming Horses and Burros Act of 1971 (P.L. 92-195). That act, as amended by the Public Rangelands Improvement Act of 1978 (P.L. 95-514), states that BLM “shall maintain a current inventory of wild free-roaming horses and burros on given areas of the public lands” to, in part, “make determinations as to whether and where an overpopulation exists and whether action should be taken to remove excess animals.”¹ Thus, nearly all the management actions that BLM takes on Herd Management Areas (HMAs) are predicated on the population-size estimates of equids on the range. Population estimates aid in allocation and management of forage and habitat and underlie the establishment of appropriate management levels (AMLs). In addition, data on changing horse and burro abundance provide information that can be used to estimate population growth rates; aid in accruing knowledge to understand population and evolutionary processes (Chapters 3 and 5); assess the effectiveness of such management actions as removals, sex-age class manipulations, and contraceptive treatments to reduce population growth rates (Chapter 4); provide important information for assigning values to parameters of population models (Chapter 6); determine whether AMLs are being maintained and meeting their objectives (Chapters 5 and 7); and inform all those who have an interest in free-ranging horses and burros (Chapter 8). This chapter responds to the BLM request for a review of free-ranging horse and burro population estimates, techniques to improve those estimates, and population growth rates.

In fiscal year 2011, BLM spent about \$641,250 to estimate the abundance of horses and burros on HMAs; that is about 1 percent of the Wild Horse and Burro Program’s annual budget (BLM, 2011). However, maintaining a current, accurate, and robust inventory of

¹“Excess animals” are ones that “must be removed from an area in order to preserve and maintain a thriving natural ecological balance and multiple-use relationship in that area” (P.L. 95-514). Chapter 7 discusses the concept of thriving natural ecological balance and the multiple-use mandate of the act.

horses and burros living on land under its jurisdiction has been a continuing struggle for BLM. Because accurate estimates of free-ranging horse and burro populations are the foundation of scientifically based management of these animals, third parties have paid considerable attention to assessments of BLM's methods for inventorying horses and burros over the history of the program (NRC, 1980, 1982; GAO, 1990, 2008). The committee received unfavorable comments during the study process from many members of the public regarding BLM's reports of equid population estimates and assumed or reported population growth rates.

This chapter focuses initially on estimation of free-ranging horse and burro populations. It first distinguishes the difference between counting animals and estimating population size and discusses why this methodological distinction is important for management and transparency. It then reviews several classes of population-survey methods and their strengths, weaknesses, and applicability to free-ranging horses and burros. The section that follows evaluates information available on the methods used by BLM to inventory equid populations and report the results to the public and Congress when this study was conducted. Recent initiatives to improve BLM's inventory procedures are then described with recommendations for strengthening the scientific validity and accuracy of the inventory program and enhancing communication of these important statistics to stakeholders. The second topic addressed in the chapter deals with population growth rates. A number of data sources that provide insight into growth rates of horse and burro populations are reviewed, and the results critiqued and synthesized. The chapter ends with a summary of the committee's conclusions regarding BLM's horse and burro inventory and reporting procedures and an assessment of typical population growth rates realized on western rangelands. The conclusions are then interpreted in the context of the challenges faced in managing free-ranging equid populations in the future.

ESTIMATING THE SIZE OF FREE-RANGING EQUID POPULATIONS

Since the inception of the Wild Horse and Burro Program, BLM's population inventory program has involved attempting to survey completely the fixed areas occupied by free-ranging equids, known as HMAs, and to count all the animals detected. Those inventory surveys are commonly referred to as censuses in BLM reports; however, a census involves the perfect enumeration of every animal that occupies a given area of interest; that is, every animal is detected and counted. That is ideal, but counting free-ranging animal populations is an imperfect exercise. Topography, the extent of survey areas, vegetation structure, weather, animal behavior and coat color, the size of areas used by individual animals, the performance of aircraft used by observers, the skill and condition of observers, sun angle, cloud cover, and wind speed are some of the major factors that can influence the detectability of animals, which in turn affects the accuracy, efficiency, and effectiveness of survey methods (MacKenzie et al., 2006). For any given set of survey conditions, those factors can result in observers' failure to detect animals that are present in a survey area or their unknowing detection and counting of the same animals on multiple occasions. Although animals can be missed or double-counted during the same survey, a large body of scientific literature on techniques for inventorying large mammals has demonstrated that failure to detect animals is overwhelmingly more common (Caughley, 1974a; Pollock and Kendall, 1987; Samuel et al., 1987). The first studies of probabilities of detection of free-ranging horses on western rangelands reported that in typical surveys only 7 percent of horses were undetected in flat, treeless terrain, but 50-60 percent were undetected in more rugged terrain with tree cover (Frei et al., 1979; Siniff et al., 1982). More recent studies of inventory

techniques have reaffirmed those conclusions (Walter and Hone, 2003; Laake et al., 2008; Lubow and Ransom, 2009; Ransom, 2012a). Overcounting horses has only been reported for a relatively high-density population in New Zealand where the systematic flight pattern of the helicopter, with closely spaced flight lines and routinely low altitude above ground, resulted in bands of horses unknowingly being counted several times (Linklater and Cameron, 2002).

Thus, the animal counts (the total number of animals tallied in a given survey) derived from BLM's typical inventory procedures do not reflect the true number of animals in an HMA but instead represent what is more appropriately termed a population estimate, that is, an approximation of the true population that is based on the data collected (the count). The counts themselves represent the minimum number of animals occupying the HMA, but how closely the counts approximate the true number of animals occupying a given HMA depends on the proportion of the animals that are undetected and thus are not counted. For example, if a BLM aerial survey counted 180 horses on an HMA and 90 percent of the animals were detected, the count was a reasonably accurate population estimate in that the true number of horses occupying the HMA was 200. However, if only 50 percent of the animals were detected, the count would represent a poor population estimate in that the true population size was actually 360 horses. There is a large body of methodological and statistical literature on the development and testing of techniques for obtaining accurate and precise estimates of animal abundance (Seber, 1982; Pollock et al., 1990; Lancia et al., 1996; Nichols and Conroy, 1996; Krebs, 1999; Williams et al., 2001; Mills, 2007; Conroy and Carroll, 2009). It provides insights on how to detect and count animals better, procedures for estimating detection probability, and techniques for "adjusting" or statistically extrapolating count data collected in various ways to produce more accurate population estimates and measures of the precision of estimates.

Population Survey and Detection Methods

Scientifically robust surveying techniques are essential for obtaining accurate estimates of the abundance of free-ranging horses and burros that are necessary for successful management of herds on BLM-managed rangelands. As detailed above, horses and burros are imperfectly detected for a number of reasons, but ground-based assessments, aerial surveys, remote-sensing imagery, genetic techniques, or some combination of these can be effective for locating animals and estimating the size of a population of equids in a target domain, such as an HMA or an HMA complex. This section reviews selected survey methods that were supported by scientific research and in use as of late 2012. It also describes methods that may have potential for detecting free-ranging equids in a logistically and fiscally feasible manner.

Ground-Based and Aerial Survey Methods

To prevent undercounting or double-counting of free-ranging ungulates, especially in heterogeneous or topographically complex landscapes, several techniques have been developed that allow explicit quantification of sampling uncertainty and detectability of animals. The following methods have been applied effectively to estimate detectability and uncertainty in estimating the abundance of free-ranging horses and burros.

Strip and Line Transects. A target domain is sampled by traveling along lines that are often placed systematically across relatively homogeneous landscapes and, in more heterogeneous

landscapes, may be distributed in more complex arrangements to ensure adequate coverage (Caughley, 1974a; Buckland and Turnock, 1992). The lines, known as transects, are typically traveled by aircraft that carry one or more observers to record animals detected. In strip-transect surveys, the observer constrains recording of animals to a relatively narrow width of the transect to try to fulfill the assumption that all animals in the transect are detected. The resulting data are used to estimate a density of animals in the areas covered by the strip transects, and this density is extrapolated to the entire area that was sampled to obtain an estimate of the number of animals in the sampled area (Burnham et al., 1980; Marsh and Sinclair, 1989).

In line-transect surveys, observers record all animals spotted while they traverse the transect, typically using distance sampling (Buckland et al., 2004, 2005), in which all groups of animals detected are recorded with their perpendicular distance from the transect. Such data aggregated across many transects are then used to estimate a detection probability function, which assumes that all groups of animals on the transect line are perfectly detected, and detectability declines for groups of animals at increasing distances from the transect line. The primary advantage of this technique for free-ranging horses is that distance sampling can accommodate large spatial areas of high topographic and vegetative heterogeneity (J. Ransom, National Park Service, personal communication, August 10, 2012), and detection probability is explicitly modeled and estimated. Assumptions of the approach are that lines are placed randomly with respect to the distribution of the objects (such as equids) sampled, that equids do not move because of the aircraft (that is, they are detected at their initial locations), that perpendicular distances from the transect line to each equid group are measured accurately, and that detections are statistically independent events. U.S. Geological Survey biologists have as yet been unable to find a distance-measuring device that works satisfactorily, but they were developing such a tool (J. Ransom, National Park Service, personal communication, August 10, 2012). Ransom et al. (2012) used distance sampling and minimally trained local observers in Mongolia to estimate the abundance of wild asses (*Equus hemionus*).

Mark-Recapture and Mark-Resight. In mark-recapture studies, animals are uniquely marked (or identified individually on the basis of unique markings or characteristics) and later recaptured (either physically or with visual recapture methods) so that a detection history of each marked animal can be compiled. Population size can be estimated by applying open-population or closed-population mark-recapture models to detection-history data (Schwarz and Arnason, 1996; Williams et al., 2001). Software packages, such as Program MARK (White and Burnham, 1999), provide a flexible framework for implementing closed-population and open-population models in estimating abundance and related parameters.

Whereas conventional capture-recapture methods for estimating population size (e.g., Otis et al., 1978; Williams et al., 2001) generally require animals to be uniquely marked in such a way that a detection history for each marked animal can be compiled, more recent mark-resight approaches can also incorporate sightings of unmarked animals into the estimation framework (McClintock and White, 2009). Mark-resight efforts can often be less expensive and less invasive (Minta and Mangel, 1989; McClintock and White, 2007) than traditional mark-recapture methods (Otis et al., 1978). In particular, animals need to be captured only one time (capture is often the most hazardous, stressful, and expensive aspect of these estimation techniques); after initial marking periods, additional data can be collected with sighting surveys, which do not necessitate physical capture of animals and thus are less invasive (McClintock et al., 2009). However, mark-resight methods assume that animals are sampled and resighted in a closed population (that is, no immigration, emigration, births, or deaths occur) and that the number of marked animals available for

resighting is known exactly or can be reliably estimated (McClintock et al., 2009). Those assumptions can be approximated by conducting sighting surveys soon after the initial marking (to ensure a closed population), by using radio collars with mortality sensors on all captured animals (McClintock and White, 2007), or by using other mark-resight models that do not require that the number of marked animals be exactly known (Arnason et al., 1991; McClintock et al., 2009). McClintock et al. (2009) provided an estimation framework that addresses both constraints by using Poisson-log (PNE) and zero-truncated Poisson logit-normal (ZPNE) mixed-effects models. Various versions of mark-resight models are available in the freeware Program MARK (White and Burnham, 1999).

Mark-resight techniques using natural distinguishing characteristics of horses have been used in Australia and New Zealand (Linklater and Cameron, 2002; Dawson and Miller, 2008), and Lubow and Ransom (2009) used a photograph-based form of mark-resight methods for enumerating free-ranging horses in the western United States by identifying each group of horses (via such markings as blaze, socks, and coat color) and determining how many groups were resighted on later flights. Transects should be widely spaced so that an HMA can be completely covered multiple times with differently oriented transects (Lubow and Ransom, 2009). Lubow and Ransom (2009) reported that the advantages of the photographic mark-resight technique for free-ranging horses are that it can be performed with only one observer, it does not matter if horses are displaced by the aircraft or if a group is encountered repeatedly on the same survey, the technique works in areas with tree cover and complex terrain, and most covariate data are captured in each photograph, so the need to write them down is eliminated. Lubow and Ransom (2009) suggested that the method is likely to produce negatively biased (but quantified) estimates of abundance, and bias probably would increase as the visibility of the horses decreases (for example, more complex topography or more tree cover). Lubow and Ransom noted that it might take several visits to obtain reliable estimates; validation of photographic mark-resight data suggested that it would take six or more occasions in areas that have complex topography and heavy tree cover. According to data collected by Lubow and Ransom (2009) at McCullough Peaks, Little Owyhee, and Pryor Mountain HMAs, the approach provided consistent and reliable estimates of total horse numbers (within 3-9 percent of exact counts). The limitations are that helicopters (which are more expensive to use than fixed-wing aircraft) are usually needed to observe markings in photographs, a high-resolution digital camera with an image-stabilized lens must be used, and it may be difficult to separate horses that have similar coat colors or that are in HMAs that have large numbers of animals (J. Ransom, National Park Service, personal communication, August 10, 2012). This method will probably perform poorly for burros (J. Ransom, National Park Service, personal communication, August 10, 2012).

Simultaneous Double-Count. Two observers independently record the number of animals seen from a given location at the same time. Records are compared to inform population estimates by assessing how many animals or groups of animals are detected by both observers and how many are detected by only one observer or the other (Caughley, 1974a; Ransom, 2012b). The technique can also be used in combination with distance sampling (Kissling and Garton, 2006). It is assumed that observers do not communicate during the observations, that observations are recorded honestly (i.e., it is not a competition), and that transects traveled are uniform, are predetermined, and cover the entire area of interest. The advantages of this method for free-ranging horses are that it provides an estimate of abundance with quantified error and does not require any special equipment. The limitation is that, even with two observers, it is unlikely that it will be sufficient to overcome large biases due to high landscape heterogeneity.

Pre-Gather and Post-Gather Counts. The number of animals captured or removed from the land is used to inform population estimates. This technique can be used when a count has been conducted and is followed soon thereafter by a gather, in which a relatively large proportion of the horses are removed and the quantity is known. Another count is conducted soon after the gather. The difference between the two counts can be used to estimate the detection probability (Eberhardt, 1982).

All the methods except removals or captures can be conducted from the ground or from the air. In ground-based surveys, observers might traverse transects on foot, in vehicles, on horseback, or a combination of the three. Ground-based observers may be in prepositioned, stationary blinds to count animals with the mark-resight or double-observation methods. Cameras can be used to photograph animals at places of common congregation, such as watering holes (Cao et al., 2012; Petersen et al., 2012), and animals can be identified in a series of photographs over time by their markings; this procedure is typically used in a mark-resight analytical framework. Given the sizes of HMAs and their varied topography, it is usually practical and cost-effective to conduct surveys of horses and burros from the air. Helicopters and fixed-wing aircraft are the two aerial survey platforms typically used. In some cases, fixed-wing aerial surveys, which are less expensive than helicopter surveys, are adequate to locate and count animals, especially in areas dominated by sagebrush or other low-growing vegetation. In areas that have higher canopy and cover, however, helicopters may be needed for slower and more careful searching patterns. In aerial surveys, survey methods may be combined. For example, more than one observer may count animals as an aircraft follows a transect pattern by using distance sampling. Transect patterns can also be flown more than once during a survey to increase accuracy of population estimation, assuming that animals do not move substantially relative to flight paths between surveys.

Similarly, the Wild Horse Identification Management System (Osborn, 2004) was established in the Pryor Mountains to enumerate free-ranging horses by using unique coat-color markings and morphological characteristics in photographs. Lubow and Ransom (2009) used this approach in three HMAs (whose horse populations were of known size and were each smaller than 400) that were monitored weekly. Before correcting for detection probability, population size was biased (undercounted) by as much as 32 percent, but estimates accounting for heterogeneity of sighting probability (detection probability) were within 3-29 percent of the true number of animals known to be occupying the areas at the time of the surveys (Lubow and Ransom, 2009). The authors considered the cost of the more accurate models that quantified uncertainty in population-size estimates to be comparable with the costs of raw counts typically used by BLM (Lubow and Ransom, 2009), although the post-processing staff time required can be greater for this technique (Ransom, 2012b).

Remote-Sensing Methods

Remote-sensing technology can be used effectively to locate and count free-ranging horses and burros with a wide variety of sensors on satellites or manned and unmanned aircraft. The sensors can obtain high-resolution images at user-defined times and locations and can capture surface-reflectance characteristics at various spatial resolutions. Manned and unmanned aircraft can also take high-resolution videography that can be used to count horses and assess condition. New technology, including videography that detects movement patterns and measures speed of travel, can sense features with tremendous detail and accuracy. These methods will continue to be developed and improved and will allow even

higher-resolution information with decreased costs. The development of remote-sensing technology to be used with unmanned (drone) aircraft also reduces the risk associated with flying planes and helicopters.

High-resolution remote-sensing imagery can be used to observe unique coat patterns and to detect identifying marks or scars for horse identification. Aerial images taken from manned and unmanned aircraft can produce images with centimeter-level resolution. In addition to color or color-infrared imagery, forward-looking infrared (FLIR) cameras can detect body heat from more than one-fourth of a mile above the ground (Millette et al., 2011). Those cameras have the potential to distinguish horses from the surrounding environment and provide an accurate method for counting animals. Quickbird and Ikonos are satellite sensors that acquire data with resolution of 0.5 to 1 m. These midlevel resolution sensors may be effective for detecting horses and for monitoring change in population densities. Higher-resolution satellite images have been developed and in time will be more readily available.

There are limitations that should be considered when selecting the appropriate remote-sensing platform with respect to estimating populations of free-ranging horses and burros (Millette et al., 2011). First, the spatial resolution of the data must be fine enough to detect individual animals (especially when animals are moving or in a herd) and reduce misidentification with other animal species. Insufficient resolution can be a problem with many satellite-based sensors. Second, data acquisition may be untimely because some technologies rely on orbiting satellites that pass over a given landscape only at intervals of a few days to a few weeks. Third, many remote-sensing technologies are expensive. Fourth, some cameras have too small a field of view and may need to pan back and forth (such as FLIR and handheld cameras). Fifth, the detectability of animals may depend on weather, time of day, vegetation composition and structure, or local topography in a survey area, and quantification of detection probability can be difficult. For example, radiant heat from the earth's surface (in particular during the daytime) can camouflage the heat produced from a horse or burro when FLIR sensors are used. Sixth, weather patterns, particularly cloud cover, can preclude data collection with many remote-sensing technologies and can add risk to aircraft operators. Finally, current Federal Aviation Administration restrictions limit the use of unmanned aerial vehicles.

Genetic Techniques

A number of studies have used molecular markers to identify animals in noninvasively collected samples to estimate population size. That approach is particularly effective for populations in which individuals are difficult to detect because of vegetative cover or elusive behavior. Traditionally, such populations were surveyed with indirect methods, or indexes, such as sign counts (e.g., feces and tracks), which were corrected for estimates of the rates at which the signs are deposited and decay. In many cases, however, those estimates have relatively large confidence intervals, which limit their usefulness in managing or monitoring populations (Barnes, 2002). For such populations, multilocus genotypes derived from noninvasively collected samples (e.g., feces, hair, and scent marks) have been used as genetic tags for individuals. With a capture-mark-recapture design, populations have been surveyed and the resulting data have been analyzed to estimate population sizes. Genetic tags have advantages over traditional tagging systems in that animals retain their genotypes throughout their lives (thus, tags cannot be lost), and there is no reason to believe that a noninvasively assigned tag will affect the ability to resample the animal (the animals cannot become trap-happy or trap-shy). For dangerous or difficult-to-observe

species—such as bears (Woods et al., 1999; Sawaya et al., 2012), mountain lions (Ernest et al., 2000), tigers (Sugimoto et al., 2012), wolves (Stenglein et al., 2010), coyotes (Kohn et al., 1999), and mountain gorillas (Guschanski et al., 2009)—genetic surveys have provided information about not only population sizes but sex ratios, levels of genetic diversity, and relatedness.

Although to the committee's knowledge the genetic-tag method has not been used for free-ranging horses, the necessary preliminary work to develop methods of preserving and genotyping DNA from horse dung has been done. There was no need to estimate population size for the Assateague Island National Seashore herd because individual horses are carefully monitored by park management, but the National Park Service sought information about relatedness among individuals to assess and inform its management regime. In a collaborative study with scientists at the Smithsonian Institution, methods of preserving horse dung were tested, and a representative set of microsatellite loci was optimized (Eggert et al., 2010). Potential disadvantages of this method include the time needed for genotyping and data analysis and the difficulties that may be encountered in finding a laboratory willing to conduct the work at a reasonable cost.

Herd Management Area Survey Information Requested and Received by the Committee

The committee initially requested the most recent 12 years of records (2000-2011) on all HMAs so that it could evaluate the methods and procedures used by BLM to estimate sizes of free-ranging horse and burro populations at the time of its study. Because BLM publishes annual national statistics on the numbers of horses and burros on western public rangelands, the committee assumed that requested records would include an estimate of the population of each HMA for each year. Actual surveys of the number of animals occupying a given HMA are usually not conducted annually (BLM, 2010), so the committee expected only a subset of years for each HMA to include records of actual animals counted on the basis of some survey procedure and estimates for the intervening years to be based on previous inventories. For years when counts were conducted, the committee requested the approximate date of the count, the survey platform used (e.g., ground, fixed-wing aircraft, helicopter), and whether the inventory covered the entire HMA or used some sort of sampling regimen whereby a portion of the HMA was surveyed and the results were extrapolated to obtain a population estimate for the entire HMA.

Previous research on techniques for surveying free-ranging horses and burros (Frei et al., 1979; Siniff et al., 1982; Walter and Hone, 2003; Laake et al., 2008; Lubow and Ransom, 2009) and many other large mammal species (Caughley, 1974a; Pollock and Kendall, 1987; Samuel et al., 1987) has demonstrated that not all animals are detected on surveys. Thus, survey results require the estimation of detection probability and adjustment of the number of animals counted to account for the proportion of animals that were undetected. The committee also asked whether the number of animals counted was adjusted to produce the population estimate for a given year. The committee was informed that populations in years in which no counts were conducted were estimated by multiplying the previous year's population estimate by some assumed population growth rate until another count was conducted (Box 2-1; BLM, personal communication, December 2011). If the HMA had experienced a gather and removal of horses in the intervening year, the number of animals removed was incorporated into the later year's population estimate. Thus, for years in which no count was performed for the HMA, the committee requested that BLM report

BOX 2-1 Converting Counts to Population Estimates

BLM biologists obtain counts of free-ranging horses and burros to inform management decisions and to monitor equid populations. Counts can be reported directly as a “population estimate” of the animals occupying a given area, or they may be altered on the basis of other information in an attempt to make the estimate more accurate. Research has consistently shown that not all animals are detected and counted when biologists conduct surveys to count them, whether from the ground or with the use of aircraft. If an estimate of the percentage of animals detected is available, the count can be adjusted by that value to obtain an estimate that is a more accurate reflection of the number of animals in the population. For example, if 80 percent of the horses in an area are assumed to have been detected and counted in an aerial survey, this value can be converted into a proportion (0.80) and the count divided by the proportion to obtain a population estimate. The appropriate calculations for the 2 years depicted in Figure 2-1 in which counts were conducted would be

Year	Count	Estimated Proportion of Animals Detected	Calculation	Population Estimate
2001	422	0.80	$422/0.80$	528
2004	722	0.80	$722/0.80$	903

If a count is not conducted in a given year but a population estimate is still needed, an estimate can be obtained by multiplying the previous year’s population estimate by an estimate of the growth rate of the population. For example, if the horse population is assumed to be growing by 20 percent a year, this value can be converted into a λ value (finite population multiplier) of 1.20 and multiplied by the previous year’s population estimate to project the size of the population in the following year when a count was not conducted. The appropriate calculations for the 2 years depicted in Figure 2-1 in which a count was not conducted would be

Year	Previous Year’s Population Estimate	Estimated Population Growth Rate (λ)	Calculation	Projected Population Size
2002	528	1.20	$(528)(1.20)$	634
2003	634	1.20	$(634)(1.20)$	761

If a detection probability or growth rate is used to adjust counts without empirically measuring either quantity, the values may simply be assumptions or “best guesses,” and the adjusted counts would be reported as population estimates with no associated measure of precision. The accuracy of such estimates depends on how closely the assumed detection probability and growth rate reflect the truth, which is probably unknown. There are, however, statistical procedures for obtaining quantitatively rigorous estimates of detection probability, population size, and growth rate on the basis of data, and there are measures of precision of each estimate. When values derived from such rigorous methods are used to adjust counts to obtain a population estimate, the precision of the population estimate can also be determined. Measures of precision are extremely valuable in interpreting estimates of population size and growth rate. A common way to convey precision of a population parameter (population size or growth rate) is to report a 90-percent confidence interval (CI) for the parameter such that there would be 90-percent probability that the real value of the parameter lies within the interval (Williams et al., 2001). For example, one population estimation method (method 1) may provide a population-size estimate of 700 horses with an associated 90-percent CI of 680–720 horses. A second method (method 2) may yield the same population-size estimate of 700 horses, with an associated 90-percent CI of 500–900 horses. In that hypothetical example, the estimate of population size obtained with method 1 is said to be more precise than that obtained with method 2 because method 1 provides a relatively narrow CI. Whenever possible, a population estimation method that provides a more precise estimate is desirable in that one can have more confidence that the population estimate is a better approximation of the true number of animals occupying the survey area than a less precise estimate.

BOX 2-1 Continued

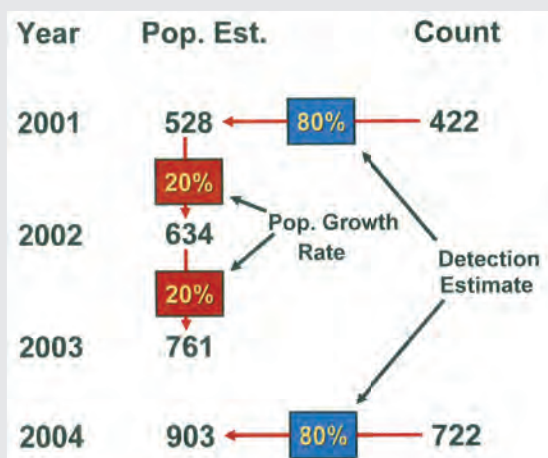


FIGURE 2-1 An example of how periodic counts of free-ranging horses on an individual Herd Management Area could be converted to estimates of population size by applying estimates of detection probabilities and the annual growth rate of the population.

NOTE: In this fictitious example, aerial counts conducted in 2001 and 2004 were used to obtain population estimates on the basis of estimates of (or assumptions about) the detection probability (proportion of horses detected on the surveys) and the growth rate of the horse population. The example assumes no horse removals during the 4-year period. If a removal had occurred, the number of horses removed would be subtracted for the appropriate year to obtain the next year's population estimate.

the growth rate that was applied to obtain the population estimate with the removal data provided in a separate master database.

The committee was informed by the national Wild Horse and Burro Program office that the HMA-specific data requested were not aggregated into a central database but were dispersed among the BLM field offices. It was suggested that a more manageable request for BLM personnel would be that the committee receive a sample of HMA data from a maximum of 40 HMAs. BLM provided a list of the 179 HMAs distributed among 10 western states, with associated data on AML and the current population estimate for each HMA, to aid the committee in selecting a sample of HMAs. The committee excluded HMAs for which the AML was zero, current population estimates were zero, or where reported numbers reflected a mix of burros and horses. To increase the uniformity of the data, HMAs that had burros (and no horses) were not included. The remaining 142 HMAs contained only horses and were ordered by the current population estimate, ranging from 5 to 1,355 (Figure 2-2; Appendix E, Table E-2). Of the 142 HMAs, the committee excluded the ones that had estimated populations of 50 or fewer because the small populations represent less than 3 percent of the horses on western rangelands. From the remaining HMA list, every third one was then selected to obtain a sample distributed evenly over the range of population sizes that occur on BLM-administered lands. That process resulted in a sample of 36 HMAs. The committee subjectively added four other HMAs that had been included

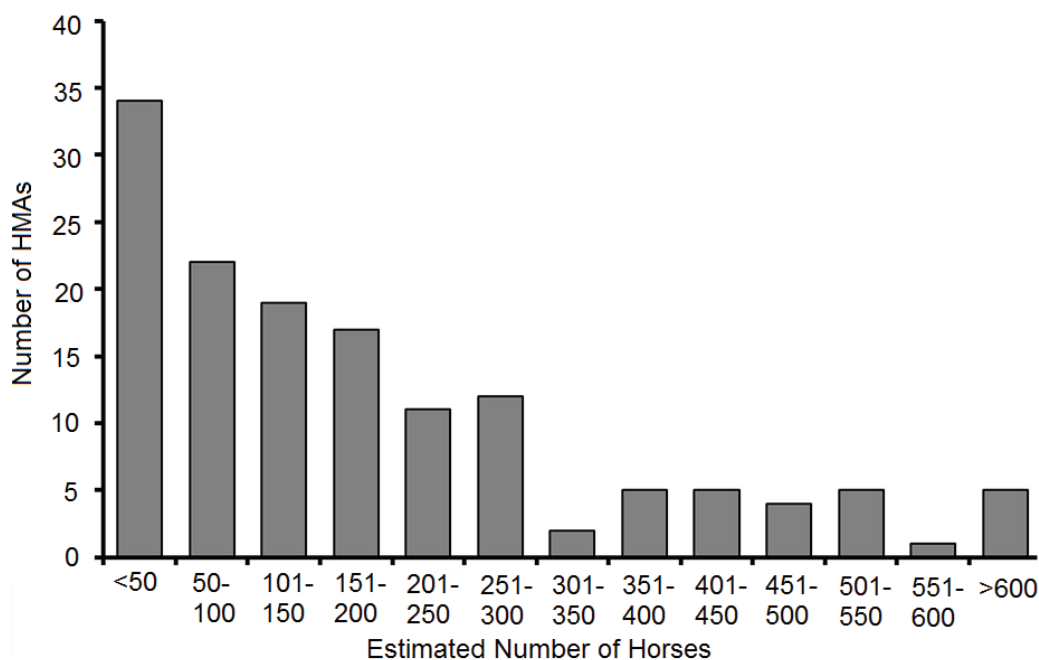


FIGURE 2-2 Distribution of 142 Herd Management Areas (HMAs) that contained free-ranging horse populations of various herd sizes.

NOTE: Population estimates were based on survey records available as of February 2011.

DATA SOURCE: Based on information provided to the committee by the Bureau of Land Management in December 2011.

in earlier research on population dynamics of free-ranging horses in the western United States (Eberhardt et al., 1982; Garrott et al., 1991b), and that brought the sample to 40 HMAs (Table 2-1; Appendix E, Table E-3). The committee received the data that it requested on all 40 HMAs. The assessment of methods used by BLM to obtain field counts of horses and estimates of population size is based information on the 40 HMAs provided to the committee by BLM. The committee sought to provide a synthetic overview of the horse inventory methods used by BLM; nonetheless, it recognized that its assessment, summarized in the following, may not accurately reflect how horses are counted or population sizes estimated on every HMA.

Assessment of Horse-Count Data for the Sample of Herd Management Areas

The frequency with which surveys were conducted to count horses in each HMA in the sample was highly variable. Among the 40 HMAs surveyed, four reported counting horses no more than once a decade, nine counted horses an average of every 3-4 years, five counted horses an average of 2 of every 3 years, 17 about every other year, and five every year. In HMAs in which horses were not counted every year, there was no discernible pattern in the interval between counts. Information on the methods used for each reported count was frequently unreported (Tables 2-2 to 2-4).

TABLE 2-1 Distribution of 142 Herd Management Areas (HMAs) among Western States That Contained Only Horses and were Actively Managed by the Bureau of Land Management and Distribution of the Sample of 40 HMAs Used by the Committee to Evaluate Wild Horse and Burro Program Methods for Surveying Horse Abundance and Estimating Population Sizes

State	Number of HMAs Available	Number of HMAs in Sample
Arizona	1	0
California	15	2
Colorado	4	3
Idaho	6	1
Montana	1	1
Nevada	63	21
New Mexico	2	0
Oregon	17	6
Utah	17	2
Wyoming	16	4
Total	142	40

TABLE 2-2 Example of Horse Inventory Data on Little Book Cliffs Wild Horse Range in Colorado, Showing Routine and Methodologically Consistent Annual Surveys

Year	Annual Population Estimate	Population Count	Date of Count	Type of Craft	Percentage of Area Inventoried	Method	Adjustment of Count
2000	153	153	August	Vehicle/Horse	All	Visual	None
2001	169	169	August	Vehicle/Horse	All	Visual	None
2002	195	195	August	Vehicle/Horse	All	Visual	None
2003	154	154	August	Vehicle/Horse	All	Visual	None
2004	178	178	August	Vehicle/Horse	All	Visual	None
2005	132	132	August	Vehicle/Horse	All	Visual	None
2006	144	144	August	Vehicle/Horse	All	Visual	None
2007	165	165	August	Vehicle/Horse	All	Visual	None
2008	122	122	August	Vehicle/Horse	All	Visual	None
2009	133	133	August	Vehicle/Horse	All	Visual	None
2010	138	138	August	Vehicle/Horse	All	Visual	None
2011	142	142	August	Vehicle/Horse	All	Visual	None

NOTE: The number of horses counted in complete surveys of the HMA is the same number reported for population estimates; thus, it is assumed that all animals were detected during the surveys.

SOURCE: Survey response from the Bureau of Land Management, February 2012.

Assuming that the reported data on the 40 sampled HMAs generally represent the procedures routinely used by BLM to enumerate horses on all HMAs, the committee made several generalizations about counts on all HMAs.² Most counts are obtained with aerial surveys in which an entire area is surveyed in an effort to obtain a complete count of the horses occupying an HMA with no attempt to apply sampling methods or to estimate the proportion of animals that were undetected. A helicopter was the preferred aircraft, although fixed-wing aircraft were also frequently used. Some surveys were conducted from

²The data supplied by BLM for all 40 HMAs can be retrieved from the study's public access file. To obtain the information, contact the National Research Council's Public Access Records Office at paro@nas.edu.

TABLE 2-3 Example of Horse Inventory Data on Reveille Herd Management Area in Nevada, Showing Irregular and Inconsistent Survey Methods

Year	Annual Population Estimate	Population Count	Date of Count	Type of Craft	Percentage of Area Inventoried	Method	Adjustment of Count
2000	164	190	November	Helicopter	100	Grid	None
2001	187						
2002	96						
2003	111	9	December 23	Fixed-Wing Airplane	70	Grid	None
2004	61	61	October 15	Helicopter	100	Grid	None
2005	71						
2006	135	119	January 6	Helicopter	100	Grid	None
2007	57	79	January 7	Helicopter	100	Grid	None
2008	66						
2009	77	213	September 9	Helicopter	100	Grid	None
2010	213	231	February 10	Helicopter	100	Grid	None
2011	91						

NOTE: These data provide an example of the difficulty of understanding how annual population estimates were derived from the survey count data.

SOURCE: Survey response from the Bureau of Land Management, March 2012.

TABLE 2-4 Example of Horse Inventory Data on Desatoya Herd Management Area in Nevada, Showing Irregular and Inconsistent Survey Methods and Incomplete Records

Year	Annual Population Estimate	Population Count	Date of Count	Type of Craft	Percentage of Area Inventoried	Method	Adjustment of Count
2000		304	August	Jet Ranger	100	Direct	
2001		294	December 1		80	Direct	
2002							
2003							
2004			February 4				
2005							
2006							
2007		238	April 7	Jet Ranger	100	Direct	
2008							
2009							
2010		434	April 10	Jet Ranger	100	Direct	
2011		543	July 11	Jet Ranger	100	Direct	

NOTE: These data provide an example of the difficulty of understanding how annual population estimates were derived from the survey count data.

SOURCE: Survey response from the Bureau of Land Management, March 2012.

the ground on foot, in vehicles, on horseback, or with a combination of the three. Ground-based surveys appeared to be performed primarily in states that had relatively few HMAs and in which the total number of horses on an HMA was low (under 150). It was also common for reported counts to be attributed to gather operations. Explanations were not provided for the individual gather-based counts, but the committee's best understanding of such counts was that a gather operation was conducted on an HMA for the purpose of removing horses from the rangeland. The gathers were assumed to have captured all horses on an HMA, and the reported count represented the number of captured horses that were

released back onto the rangelands. Although survey methods used for some HMAs in the sample that the committee examined appeared to be consistent with respect to time of year and survey platform, the timing of surveys on many of the reviewed HMAs were inconsistent; they were often distributed over 6-9 months of the year, and this led the committee to conclude that such practices are common. It was also relatively common in the sample of HMAs that the committee examined for survey methods to differ from count to count on a given HMA—some counts were performed from helicopters, others from fixed-wing aircraft, and others from gathers.

It was difficult for the committee to understand the rationale for the timing and distribution of counts for the sample of HMAs, but it did detect what appeared to be a pattern related to timing of gathers and horse removals (provided to the committee in separate files by the national office). A common pattern observed in the HMA records was a report of a complete count followed by a variable period of years in which no counts were performed and then a report of another count immediately before a major gather and horse removal. On some occasions, a follow-up count was reported immediately after a removal. On the basis of recommendations of the National Research Council Committee on Wild and Free-Roaming Horses and Burros (NRC, 1982), BLM-published procedures for surveying and counting free-ranging horses (BLM, 2010), correspondence with Wild Horse and Burro Program administrators, and a review of a sample of HMA environmental assessment documents prepared for horse removals, the committee interpreted that pattern as reflecting a need to have a recent count of horses on an HMA before a removal. Thus, the committee speculates that after a period of no counts, when a population was assumed to have increased, expertise of the local manager indicated that the horse population needed to be reduced, and a count was conducted to determine whether the population was over the AML. If the count was sufficiently higher than the established upper bound of the AML, an environmental assessment was prepared, and a gather and removal occurred. Post-removal counts were often recorded as gather counts; this suggests that the gather was assumed to have captured all horses on the HMA and that the count reflected the number of horses that were released back onto the HMA. Alternatively the post-removal counts may have reflected a combination of the number of horses released and some estimate of the number on the HMA that remained uncaptured. It was unclear from the data that the committee received which of those assumptions was made by BLM managers for individual records.

Relationship Between Direct Counts of Horses and Reported Herd Management Area Population Estimates

All annual population estimates for the 2000-2011 period requested were provided for 24 of the sample of 40 HMAs; no estimates were provided for five HMAs, and estimates for the other 11 were incomplete (generally, less than 50 percent of the estimates were provided). No reported population estimates included associated measures of precision. The committee assumed that all population estimates were derived in some fashion from survey count data (as described and illustrated in Figure 2-1), and the description of the process used to develop annual population estimates provided by the national Wild Horse and Burro Program office supports this assumption:

When the data [annual HMA population estimates] are updated for any given year the starting point is the previous year's population estimate. These data are updated based on the following: 1) removals (gathers) that have been conducted since February 28th of the previous year, 2) new population surveys (census) that have been conducted since February 28th of the previous year and 3) when no population surveys were conducted

in the previous year, the previous year's data are increased to account for the year's foals based on historical experience regarding annual population increase typical of that HMA (normally about 20% if a gather/removal had not been conducted). When no population survey has been conducted consideration is also given to the estimated effects of any fertility control vaccines that have been previously administered. (BLM, email communication, May 2, 2012)

As mentioned, most population estimates reported in years when counts were conducted for the 40 sampled HMAs simply reported the number of animals counted without adjustment for the proportion of undetected animals or measures of precision. In the few instances in which a population estimate for a given year was higher than a count in the same year, there was little notation to indicate that the difference was due to application of a detection probability adjustment. In cases in which it seemed plausible that that occurred, the committee calculated the assumed detection probability by dividing the annual count by the population estimate; the resulting values of assumed detection probability generally ranged from 0.7 to 0.9. However, there were substantial records for the sampled HMAs of reported population estimates that were considerably smaller than the counts in those years when there were no records of horses being removed. There were also instances in which population estimates were much higher than reported counts but with no explanation for the differences.

The methods used to estimate population sizes in years in which no counts were conducted were seldom noted in the records provided to the committee. When records clearly stated that an assumed population growth rate was applied to the previous year's population estimate, an annual growth rate of 20 percent was generally used. As with detection probability, when it seemed plausible that a population growth rate was used to project population estimates for years in which no counts were conducted, the committee calculated the assumed growth rate by dividing the second year's annual population estimate by the previous year's annual population estimate to obtain an estimate of λ , that is, the population growth rate. The resulting values (reported as percent growth) were variable, generally ranging from 3 to 38 percent; values of 15 to 25 percent were most common. A substantial proportion of the population estimates reported for years in which no counts or gathers were conducted, however, diverged enough from the estimates reported both immediately before and after that, without further explanations, the committee could not understand how such values were obtained. One plausible explanation for at least some of those cases is that horses were freely moving on and off HMAs.

Relationship Between Direct Counts of Horses and National Population Estimates

National statistics that provide estimates of the total number of free-ranging horses and burros on public rangelands are published annually in BLM reports and on the Wild Horse and Burro Program website. Those are important statistics because they are interpreted by various public constituencies to gauge the success of the program's management, are used in formal government reviews of the program (NRC, 1980, 1982; GAO, 2008; OIG, 2010), and are foundational data for planning and budgetary documents, such as BLM's *Proposed Strategy: Details of the BLM's Proposed Strategy for Future Management of America's Wild Horses and Burros* (BLM, 2011). The procedure used to generate the annual state and national estimates was described to the committee as follows:

Each year shortly after February 28th, field offices submit updated estimates for each HMA to the National Program Office. These field submissions are compiled into one national

report that lists new estimates for each HMA and that is organized by state. (BLM, email communication, May 2, 2012)

Given the incompleteness of the counts and population estimates that the committee received for the sample of 40 HMAs, which came from the field offices, it was not clear how the national statistics could be calculated. Therefore, the committee requested the series of HMA estimates that were reported to the national office from the field offices and used in generating the state and national estimates for the most recent 5-10 years. In response to its request, the committee was pointed to the national HMA-specific estimates for fiscal years 2005-2011 that were posted on the program's website.³ The committee also received files with earlier national HMA estimates from fiscal years 2000-2004. However, the corresponding information that the national office received from the field offices to generate the published estimates was not provided to the committee. The committee was informed that that information was discarded after the annual national statistics were published (BLM, personal communication, May 2012). Thus, the committee received no documentation linking the national statistics to information reported from the field offices. It was not clear whether the information from the field offices was modified by some procedure at the national office before publication on the program's website, but various correspondence with personnel at the national office suggested that some changes were made. That impression was reinforced when the committee compared the national HMA-specific population estimates with those reported by the field offices for the sample data on 40 HMAs provided to the committee. The committee found that a substantial proportion of the HMA estimates published by the national office did not correspond to the ones the committee received from the field offices; discrepancies ranged from modest to many hundreds of animals. In addition, all HMAs in the reported national statistics had a population estimate for all years, whereas a substantial proportion of the HMA records that the committee received from the field offices had no population estimates reported for some of the years.

Evaluation of Current Methods for Enumerating Free-Ranging Horse Populations

The sample of HMA records made available to the committee and examined with the evaluation of the national population statistics indicates that robust inventory procedures were adhered to on few HMAs during the most recent decade of population monitoring. The committee identified five primary weaknesses in inventory procedures: inconsistent methods, likely movement of horses among HMAs, little or no effort to quantify detection probability and apply corrections accordingly, no attempt to quantify precision of abundance estimates, and inadequate record-keeping and database management. It is reasonable to expect that different survey techniques may be optimal in inventorying animals depending on attributes of individual HMAs, such as the size of the equid population and of the area, accessibility, distinctiveness of individual horses, ruggedness of topography, and presence of tree cover. Once a survey method is determined for an HMA or HMA complex, however, it should be used consistently so that variation in the number of animals counted from one survey to the next can be reasonably attributed to population changes and is not confounded by the use of different techniques. The most prevalent problems that the committee identified in that regard were inconsistency in the timing of surveys and in the survey platform used (fixed-wing, helicopter, ground-based, or gathers). Movement

³Available online at http://www.blm.gov/wo/st/en/prog/whbprogram/herd_management/Data.html/. Accessed November 20, 2012.

of horses across HMA boundaries can seriously confound interpretation of changes in the numbers of animals counted from one survey to the next. Although there appear to be few data on this issue, field personnel recognize it as a common problem, and relatively large changes in the numbers of animals counted in consecutive surveys may be reasonably attributed to movement of animals on and off HMAs. It was not clear to the committee whether data on spatial distribution of animals are routinely collected during inventory surveys. Information on where animals are observed can provide important insights into habitat use and resource selection by free-ranging equids, which in turn would contribute to a better understanding of competition with livestock and wildlife and assist in decisions on forage allocation and other issues related to rangeland health (see Chapter 7).

It is also well documented that the types of survey methods used for counting free-ranging horses and burros are imperfect in that various proportions of animals will not be detected in any given survey and detection probability can vary over time and space. Evidence clearly indicates that, under some conditions that are common for rangelands occupied by free-ranging horses and burros, the proportion of animals missed can be substantial. Thus, the routine reporting of the uncorrected counts as population estimates results in inventory numbers that are systematically biased low. Finally, the apparent difficulty of meeting data requests from the committee, the incompleteness of many of the records provided to the committee, and the lack of data supporting the national population statistics indicate deficiencies in the routine documentation of survey efforts and results and in database management. Many of the same issues were also identified by the National Research Council Committee on Wild and Free-Roaming Horses and Burros, which reviewed similar records near the start of the Wild Horse and Burro Program over 30 years ago (NRC, 1980, 1982).

Initiatives to Improve Methods for Enumerating Free-Ranging Horse Populations

At the time this report was written, BLM had initiated a number of actions aimed at improving the rigor, reliability, and utility of the procedures used to estimate the abundance of free-ranging horses and burros. First, in its *Wild Horses and Burros Management Handbook* (BLM, 2010), BLM provided guidelines for survey techniques used to enumerate free-ranging horses and burros, stating

- The target interval for conducting population surveys is every 2 years, as recommended by the National Research Council Committee on Wild and Free-Roaming Horses and Burros (NRC, 1982).
- Techniques that provide sightability and detection corrections are to be used.
- Survey methods and timing are to be consistent.
- All details of each survey are to be recorded and permanently on file.
- Survey data are to be entered into a centralized database (the Wild Horse and Burro Program System).

The committee readily endorses those guidelines. Adherence to them will greatly improve the utility of equid population estimates.

Second, in response to the widely held perception that free movement of animals among adjacent HMAs confounds inventory procedures and reduces the ability to interpret counts, managers have subjectively assessed their knowledge of equid movements among adjoining HMAs and aggregated 93 of 179 HMAs into HMA “complexes.” Each complex is composed of two to six areas managed for equids; many HMAs are managed with adjacent

U.S. Forest Service Wild Horse (or Burro) Territories. The goal is to coordinate surveys, gathers, removals, and other management actions among HMAs within a designated complex and thus to manage all horses in a complex as a single biological population (BLM, 2010). The committee thinks that that procedural change has the potential to improve interpretation of counts substantially, although the degree of improvement hinges critically on how often and how many animals move across HMA boundaries. Conducting aerial inventories over large areas, however, has its own set of challenges. The committee had no knowledge of implementation at the field level with respect to the coordination of population surveys and management actions (removals) among HMAs within designated complexes.

Third, for over a decade, scientists from the U.S. Geological Survey (USGS) Fort Collins Science Center have conducted research and provided scientific support to the Wild Horse and Burro Program. In 2004, an Aerial Survey Work Plan was developed and field research was implemented to develop and test improved techniques for inventorying free-ranging horses from both helicopter and fixed-wing survey platforms. Several methods were evaluated including various mark-resight techniques, distance sampling (transects), and sightability models. The research reaffirmed that substantial proportions of horses are not detected in aerial surveys and that detection is poorer in more rugged and tree-covered terrain than in flatter, more open landscapes (Lubow and Ransom, 2009). Several of the mark-resight techniques evaluated were successful in accounting for varied detection probability and for providing estimates close to the known number of horses in the experimental populations. Less successful techniques that were evaluated included distance sampling, forward-looking infrared technology, and remote sensing. In addition, GPS mapping technologies were incorporated into all aerial survey procedures and provided data on animal distributions and patterns of resource selection. At the time this report was written, the USGS team had trained eight BLM personnel in the new survey methods, and they had started to conduct rigorous surveys on 35 HMAs in seven states. In August 2012, BLM hired a national aerial-survey coordinator to continue to implement reforms in the inventorying procedures (BLM, 2012).

The committee encourages BLM to continue such collaboration and reform of its procedures. Those actions and adherence to the survey guidelines in the 2010 handbook will improve the accuracy and defensibility of its population estimates. More robust and transparent data may also improve its relationship with stakeholders (see Chapters 7 and 8).

EQUID POPULATION GROWTH RATES

The change in abundance of a population over some period is generally known as a growth rate. Understanding growth rates is important for efficient and effective management of free-ranging equid populations. Knowing population growth rates gives managers the ability to project how quickly populations will increase and when management actions (such as removals or fertility treatments) need to be applied. They are also key information for determining the magnitude of fertility treatments needed to reduce population growth rate to some desired level and, after treatment, to evaluate whether the intervention had the expected effect. Growth rate estimates are used to estimate the size of populations in years in which counts will not be conducted (Figure 2-1), as estimates are needed for inventory, management, and planning purposes.

Like populations of most other terrestrial mammals in North America, free-ranging horse population dynamics have a seasonal cycle in which animals are added to the population by births during a relatively short interval in the spring and animals are removed from the population through deaths (and management removals) throughout the year. The

natural interval for estimating population growth rates is the year. Each species has an inherent maximum population growth rate that is dictated by its life-history characteristics, including how often animals can reproduce, the number of young produced per reproductive event, the age at which animals become reproductively mature, and the death rates for the various age classes of animals.

There was essentially no knowledge of free-ranging horse population dynamics and growth rates when the populations received federal protection in 1971. During the decade that followed, federal land-management agencies, primarily BLM and the U.S. Forest Service, began to inventory horse and burro populations, and a number of studies of horse demography were undertaken. Scientific demographic investigations of free-ranging horses, however, were limited to three 1- to 2-year studies of western herds (Feist and McCullough, 1975; Nelson, 1978; Boyd, 1980), two studies of herds on barrier islands on the Atlantic coast (Welsh, 1975; Keiper, 1979), and a study of ponies in Britain (Tyler, 1972). A review of the studies by the National Research Council Committee on Wild and Free-Roaming Horses and Burros (NRC, 1980) and novel analyses conducted by that committee revealed ambiguities. The committee noted that the 16- to 22-percent annual growth rate estimates derived from direct counts conducted by management agencies were notably higher (by up to 10 percent) than estimates obtained with population models (Conley, 1979; NRC, 1980, 1982; Wolfe, 1980) that used the best available survival and fecundity data on domestic horses and from the few studies of free-ranging horse populations. A good understanding of demographic processes can contribute substantially to the effectiveness of programs designed to manage wildlife populations; the 1980 National Research Council report recommended additional research on demography, and considerable progress has been made on horses. There have been a few studies of feral burro demography in Australia (Freeland and Choquenot, 1990; Choquenot, 1990, 1991), but little is known about the demography of free-ranging burros in the western United States. Because key aspects of burro life-history characteristics and their ecological niche differ from those of horses, this committee recommends separate studies on burro population growth rates.

Population Growth Rate Estimates Based on Counts

The most direct method for estimating growth rate of a population is to obtain counts or population estimates over multiple years. If the population is growing at a relatively constant rate over the period for which counts or estimates of abundance are available, the abundance values, when log-transformed, will be approximately linear. Linear-regression techniques can be used to fit a line to the data, and the estimated slope of the line provides an estimate of the instantaneous growth rate of the population, denoted by r (Caughley, 1977; Eberhardt, 1987). The procedure also provides an estimate of the precision of r . The slope estimate can be back-transformed (exponentiated) to obtain the finite population growth rate, denoted by λ . The λ value is also referred to as the population multiplier in that one can multiply a population estimate (or count) in a given year by λ to obtain an estimate of the number of animals in the population a year later (see Box 2-1 for an example). When λ is 1, the population is stable or unchanging; when λ is over 1.0, the population is increasing; and when λ is under 1.0 the population is decreasing. Thus, a λ of 1.03 indicates that a population is growing by 3 percent a year, and a λ of 1.20 indicates that a population is growing by 20 percent a year. For consistency in reporting growth rates, the committee used the convention used in BLM documents: reporting growth rates as annual percentages.

A number of studies have used log-linear regression of time series of counts of free-ranging horse populations in the western United States to estimate annual growth rates.

The National Research Council Committee on Wild and Free-Roaming Horses and Burros (NRC, 1980) calculated a weighted mean of 16 percent for aerial count data on 25 HMAs in five states. Wolfe (1980) used count data on 12 HMAs in six states and calculated values ranging from 8 to 30 percent and an unweighted mean of 22 percent but in a later publication suggested a typical growth rate of 15 percent for western U.S. herds (Wolfe, 1986). Counts of two Oregon horse herds were used by Eberhardt et al. (1982) to estimate growth rates ranging from 20 to 22 percent. Similarly, Garrott et al. (1991b) estimated growth rates ranging from 15 to 27 percent with a mean of 21 percent for 12 HMAs in four states. Since those studies were published, a number of additional analytical methods have been developed to estimate population growth rates, and associated measures of precision, on the basis of a time series of counts or abundance estimates that can provide enhanced insight into population processes (Dennis et al., 1991, 2006; Humbert et al., 2009). The techniques would be useful in future studies of Wild Horse and Burro Program inventory data.

The Pryor Mountain herd in Montana is perhaps the most well-studied free-ranging horse population in the western United States. The herd's size (100-200) and the small and traversable geography of the HMA have been conducive to a number of estimates of this population's growth rate over the last 3 decades. Nearly all animals have been individually identified in the population because of unique color and marking patterns and have been closely monitored each year, so reproduction, mortality, and total number of horses on the range have been known with considerable certainty, and this allows each annual growth increment to be approximated relatively precisely. Under those special conditions, it is reasonable to estimate an annual λ by dividing the count obtained in a given year by the count obtained in the preceding year. Estimating annual growth rates from counts conducted in two consecutive years is not reliable for most free-ranging equid populations because variation in the proportion of animals detected from one count to the next and movement of animals between adjacent HMAs can dramatically bias λ estimates either upward or downward. Those problems are not prevalent in the small, isolated, and intensively studied Pryor Mountain herd, in which annual estimates from consecutive counts can be considered reliable.

Garrott and Taylor (1990) reported an average annual growth rate of about 18 percent in 1977-1986 in the Pryor Mountain herd, and a similar growth rate was reported by Singer et al. (2000) in 1992-1997. More recently, Roelle et al. (2010) reported a temporary decline in the herd's annual growth rate to about 11 percent. The lower growth rate was attributed at least partly to lower foal survival due to mountain lion predation and possibly the effects of contraceptive treatment of a modest number of mares, but growth had returned to higher rates near the end of their studies (2005-2007) coincident with hunters harvesting several mountain lions from the range. Similar individual-based studies of horse demography conducted in a number of populations occupying barrier islands along the Atlantic coast have documented annual growth rates of 4.3 percent in the Cumberland Island, Georgia, population (Goodloe et al., 2000), about 10 percent in the Assateague Island, Maryland, population (Keiper and Houpt, 1984), and 16 percent in the Shackleford Banks, North Carolina, population (Wood et al., 1987).

Population Growth Rate Estimates Based on Models

A more indirect method for investigating population growth rates of free-ranging horse populations is the construction of population models that use age-specific estimates of horse survival and fecundity rates obtained from field studies. Model-based approaches provide asymptotic or long-term population growth rate estimates that are based on input parameters as opposed to the abundance-based approaches discussed in the previous

section that provide estimates of realized growth rates. Such exercises were initially conducted about 3 decades ago when little demographic information was available to provide a basis for assigning values to parameters in such models (Conley, 1979; NRC, 1980, 1982; Wolfe, 1980). During the decade after those studies, additional information on survival and reproductive rates was published (Seal and Plotka, 1983; Keiper and Houpt, 1984; Berger, 1986; Siniff et al., 1986; Wolfe et al., 1989; Garrott and Taylor, 1990; Garrott, 1991b; Garrott et al., 1991b). Garrott et al. (1991a) used insights from those studies to parameterize the Lotka/Cole equation with a variety of age-specific fecundity and survival schedules to model western free-ranging horse population growth rates. The modeling exercise yielded growth rate estimates of 11-27 percent. Later published studies have provided additional estimates of the range of survival and fecundity rates in specific free-ranging and fenced-in horse populations on western U.S. rangelands (Greger and Romney, 1999; Turner and Morrison, 2001; Roelle et al., 2010) and Atlantic barrier islands (Goodloe et al., 2000) and herds in France (Monard et al., 1997; Cameron et al., 2000), New Zealand (Linklater et al., 2004), Argentina (Scorolli and Lopez Cazorla, 2010), and Australia (Dawson and Hone, 2012). Those studies generally reported survival and fecundity rates within the ranges of those used in earlier population modeling efforts.

When capture-recapture data collected on individually marked horses are available, Pradel's temporal symmetry models can also be used to estimate realized population growth rate (Pradel, 1996; Williams et al., 2001). That approach allows the estimation of other useful demographic parameters (such as apparent survival and recruitment rates) and the modeling of these parameters as functions of covariates. However, application of the approach requires that horses be individually marked and recaptured (physically or visually) in such a way that the capture history of each animal can be compiled. BLM does not regularly mark horses, and the effort required to describe and catalog unique identifiable natural markings of individual horses in most situations is not practical. Data on several intensively studied horse populations on Atlantic barrier islands and in the western United States are being collected and can be used in those types of models (Goodloe et al., 2000; Turner and Kirkpatrick, 2002; Lubow and Ransom, 2009; Roelle et al., 2010).

Population Growth Rate Estimates Based on Horse Age-Structure Data

Another source of data that was available to the committee to help in gaining insight into the average growth rates of free-ranging horse populations was the age structure of the horses captured and removed from western rangelands. Those data are routinely collected on all horses captured and removed during management gathers; irruption and wear of teeth are used to estimate the age of each horse removed from public rangelands as it was processed before transfer to adoption or holding facilities. The age structure of a population is the result of many interacting population processes, and this complicates interpretation of age-ratio data on individual populations (Caughley, 1974b). However, as discussed earlier in this chapter, analysis of inventory data on free-ranging horse populations and population modeling approaches provided relatively consistent results with respect to the average growth rate of horses on western rangelands. Thus, it is reasonable to use the aggregate age-structure data on horses captured and removed from the rangelands, which are collected independently of the inventory data, in an attempt to corroborate horse population growth rates derived from inventory data.

The committee had access to age data on 167,927 horses captured and removed during 1989-2011; the number of animals captured and removed each year varied from 2,468

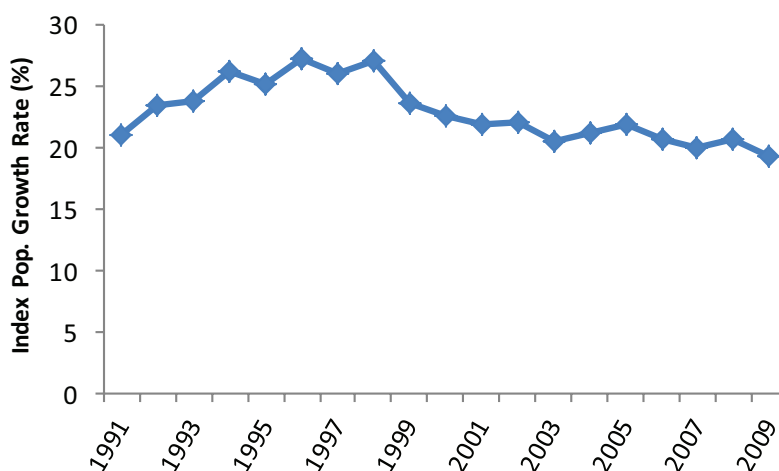


FIGURE 2-3 An index of population growth rate of free-ranging horses based on data on ages of 167,927 horses captured and removed from western rangelands in the United States to manage their abundance.

NOTE: Age-structure data were available for 1989-2011; the number of horses captured and removed each year ranged from 2,468 to 11,416. The index was calculated by dividing the number of young-of-the-year horses by the total number of horses 1 year of age and older in a sample of horses captured and removed from rangelands and then multiplying the result by 100 to obtain a percentage. A 5-year moving average was used to calculate a growth rate index; the annual values plotted in the graph were derived from the age data from a given year, the 2 preceding years, and the 2 following years.

to 11,416.⁴ A reasonable index of the average growth rate of horses on western rangelands can be calculated by dividing the number of young-of-the-year horses (that is, horses less than 1 year old) by the total number of horses 1 year of age and older in a captured-and-removed sample and multiplying the result by 100 to obtain a percentage. The committee used a 5-year moving average with the 1989-2011 dataset of ages of captured and removed horses when calculating the index to have a large sample of captured and removed horses that would be characteristic of the diverse ecological settings of western rangelands and to reduce variation due to the particular subset of horse populations gathered in any given year. The growth rate index generally was 20-25 percent with some indication of a modest increase during the 1990s; but during the most recent decade, the growth rate index was relatively stable or perhaps experienced a slight decline (Figure 2-3).

The age-structure data would need to have come from horses captured and removed immediately before the birth pulse for the index to reflect realized growth rates of the free-ranging horse populations accurately and thus to account for all deaths of horses over the year after the birth pulse. Gathers, however, occurred throughout the year and were most concentrated in August–February. The index therefore probably overestimates growth rates to some extent. It is difficult to estimate the magnitude of the bias, but, on the basis of the available literature on timing and extent of mortality of horses, the committee believes that the bias is modest.

⁴The data supplied by BLM for the removed animals can be retrieved from the study's public access file. To obtain the information, contact the National Research Council's Public Access Records Office at paro@nas.edu.

The index also assumes that the age distributions of horses captured and removed from rangelands were representative of the age structure of the free-ranging populations. A bias could have been introduced into the age-structure data of captured and removed horses if managers tended to remove the youngest horses, which were more easily adopted, and to return older, less adoptable horses to the rangelands. Such a practice, if widespread, would inflate the index and suggest that population growth rates were higher than what were actually realized. The committee had no way to evaluate such a potential bias directly. It did, however, review preliminary environmental assessments of a sample of recent HMA gather plans to gain some insight into the potential bias in the age-structure data. Age-selective removals were nearly always considered in the gather plans that the committee reviewed, but the preferred (proposed) actions often did not involve age-selective removals. The committee also noted that in a number of the environmental assessments that presented the history of gathers, usually no captured horses were returned to the rangelands. For gathers in which some captured horses were released, the number of horses returned to the rangeland generally constituted a small proportion of the total number of animals captured. In addition, diverse reasons for the selection of horses to be released were stated, including considerations of conformation, coat color and marking patterns, and mares that were treated with a contraceptive vaccine. It was also stated that horses were selected for release to “maintain a diverse age structure.” Thus, the committee found little evidence to suggest an overt and consistent bias in the age structure of horses that were removed from rangelands and concluded that the age-structure data can provide a reasonable assessment of the general growth rate of the free-ranging horse populations on public rangelands in the western United States.

The committee concludes that the population growth rate index derived from the age structure of captured and removed horses is generally consistent with the herd-specific population growth rates reported in the literature. That suggests that a mean annual population growth rate in the free-ranging western horse population approaching 20 percent is a reasonable approximation.

CONCLUSIONS

From its review of the information provided by BLM on population-survey methods, approaches to data collection and population estimation, and records on horse removals and the committee’s review of the relevant literature on estimating ungulate populations and population growth rate, the committee draws the following conclusions.

Estimating the Size of Free-Ranging Equid Populations

Management of the nation’s free-ranging horses and burros should be based on rigorous population-monitoring procedures that are consistently applied by all BLM field offices. The methods reviewed by the committee for monitoring animal numbers on a small subset of HMAs may be adequate, but all reviews of the procedures routinely used by BLM to survey free-ranging horses and burros since the inception of the Wild Horse and Burro Program have identified substantial methodological flaws. On the basis of the information that was reviewed, the committee concluded that many of the shortcomings identified in previous reviews have persisted. At the time that the committee completed its review, inventory methods and statistical tools common to modern wildlife management were used to count horses on only a few HMAs. In addition, survey methods used to obtain

sequential counts of horse populations on an HMA were often inconsistent and generally poorly documented.

Initiatives to improve population monitoring have, however, been implemented in recent years. Aggregating neighboring HMAs on which free movement of horses is known or likely into HMA complexes for the purposes of coordinating population surveys, removals, and other management actions is an important step that can improve data quality and interpretation and enhance population management. The committee commends the partnership between BLM and USGS to develop rigorous, practical, and cost-effective survey methods that account for imperfect detection of animals. The committee strongly encourages BLM to continue that collaborative research effort to identify and refine a suite of survey methods that are effective for the varied landscapes occupied by horses and burros. Transferring the resulting knowledge to those in the field offices responsible for routine monitoring of populations is essential if the reforms are to be institutionalized.

Once more rigorous survey methods are adopted, they need to be standardized and consistently used, as dictated in the *Wild Horses and Burros Management Handbook* (BLM, 2010). The committee reaffirms the recommendations of a previous National Research Council committee that annual population surveys are not required to adequately monitor and manage free-ranging horse and burro populations. BLM, however, should develop protocols for how frequently surveys are to be conducted and ensure that the resources are available to field personnel to maintain a standardized survey schedule. Consideration should also be given to identifying a subset of HMAs that typify the diverse ecological settings throughout western rangelands that can be used as sentinel populations in which detailed demographic studies are conducted annually to assess population dynamics and responses to changes in animal density, to management interventions, and to variation in seasonal weather and potential trends in climate. Record-keeping needs to be substantially improved; the committee recommends that the Wild Horse and Burro Program develop a uniform relational database—that is accessible to and used by all field offices—for recording all pertinent population survey data.

On the basis of the information provided to the committee, it cannot consider the national statistics scientifically rigorous. The data used in the national statistics are the HMA counts that the committee assumes are converted to population estimates for each year in which counts are conducted, and the counts are extrapolated to produce population estimates in later years in which counts are not conducted (Figure 2-1). The procedures used for developing annual HMA population estimates from counts are not standardized and often are not documented, but it seems clear that the national statistics are the product of many hundreds of subjective and probably independent judgments and assumptions by range managers and administrators about the proportions of horses counted in surveys, population growth rates, effects of management interventions, and potential animal movements between HMAs. Perhaps most important, the links between the national statistics and actual population-size surveys, which are the foundational data of all estimates (whether derived at the field-office or national level), are obscure. Thus, the procedures and processes used by the Wild Horse and Burro Program to generate the national statistics impart a large measure of uncertainty in the numbers and their interpretation. Development of a uniform and centralized relational database that captures all inventory and removal data generated at the level of the field offices and animal processing and holding facilities and that is used by the national office to generate annual program-wide statistics would provide a clear connection between the data collected and the reported statistics. The committee also suggests that the survey data at the level of the HMA and any procedures used to modify the survey data to generate population estimates be made

readily available to the public to improve the transparency of and public trust in the management program (see Chapters 7 and 8).

In addition to the methodological shortcomings of BLM's current animal inventory and data-management procedures, it is the committee's judgment that the reported annual population statistics are probably substantial underestimates of the actual number of horses occupying public lands inasmuch as most of the individual HMA population estimates are based on the assumption that all animals are detected and counted in population surveys—that is, perfect detection. A large body of scientific literature focused on inventory techniques for horses and many other large mammals clearly refutes that assumption and shows estimates of the proportion of animals missed on surveys ranging from 10 to 50 percent depending on terrain ruggedness and tree cover (Caughley, 1974a; Siniff et al., 1982; Pollock and Kendall, 1987; Garrott et al., 1991b; Walter and Hone, 2003; Lubow and Ransom, 2009). The committee has little knowledge of the distribution of HMAs with respect to terrain roughness and tree cover, but a reasonable approximation of the average proportion of horses undetected in surveys throughout western rangelands may be 0.20 to 0.30. If those proportions are applied to the 2012 population estimate of 31,453, the national statistic would need to be adjusted to 39,316–44,933. The conclusion by this committee that there are considerably more horses on public rangelands in the western United States than reported in the Wild Horse and Burro Program national statistics was also reached by an earlier National Research Council committee (NRC, 1980, 1982) and by the Government Accountability Office (2008).

Population Growth Rates

The earlier National Research Council committee questioned claims of population growth rates in free-ranging horses on western rangelands exceeding 5-10 percent (NRC, 1980), but adequate studies conducted since then have clearly demonstrated that growth rates approaching 20 percent or even higher are realized in many horse populations. That conclusion is corroborated by studies of survival and fecundity rates and reinforced by population models that integrated these estimates to project growth rates. It is more difficult to estimate the typical or average population growth rate in western horse populations inasmuch as such an assessment would require estimating growth rates in an adequate representative sample drawn from all horse populations managed by BLM. Although the literature provides a relatively large number of growth rate estimates, the studied populations constitute a sample of convenience in that they were selected simply because data for estimating growth rates were available or there was specific scientific or management interest in particular populations. Those studies collectively demonstrate that growth rates vary substantially from one population to another and may also vary from one period to another in the same population.

The age-structure data on animals removed from the range probably provide the most representative sample in that the data were collected over several decades, involved multiple management gathers from a large proportion of HMAs, and involved large numbers of animals. Those data also provided a relatively consistent estimate of the proportion of young-of-the-year animals in free-ranging populations that is consistent with the generally high growth rates documented for individual herds that were based on direct counts. It is also to be expected that most free-ranging horse population growth rates are close to the biological potential for the species, given the general management policy of periodically removing relatively large proportions of populations to meet AML goals, which, in turn, were established at least partially to ensure that horses were not routinely food-limited (see

Chapters 3 and 7). On the basis of the published literature and the additional management data reviewed by the committee, the committee concludes that it is likely that most free-ranging horse populations on public rangelands in the western United States are growing at an annual rate of 15-20 percent.

Consequences for Management

The committee's conclusions that there are substantially more horses on public rangelands than reported and that horse populations generally are experiencing high population growth rates have important consequences for management. Population growth rates of 20 percent a year would result in populations doubling in about 4 years and tripling in about 6 years. Thus, if populations were not actively managed for even short periods, the abundance of horses on public rangelands would rapidly increase until animals became resource-limited (see Chapter 3). Resource-limited horse populations would affect forage and water resources for many other animals that share the rangelands with them and potentially conflict with the legislative mandate that BLM maintain a thriving natural ecological balance. They would also increase the possibility of conflict with the multiple-use policy of public rangelands (see Chapter 7). Thus, BLM should diligently monitor and manage free-ranging horse populations to meet the numerous congressional mandates in the Wild Free-Roaming Horses and Burros Act of 1971 and the Public Rangelands Improvement Act of 1978.

The larger the population of horses on public lands and the higher the growth rate of the populations, the larger the increment of new animals each year. BLM has been removing an average of about 8,000 horses from rangelands each year for the last decade in an effort to control horse populations and meet its legal obligations. Removing such a large number of horses each year has substantially exceeded the capacity of BLM to place horses into private ownership; a result is that many tens of thousands of unwanted horses are maintained in long-term holding facilities until they die. Despite the aggressive program to remove horses from public rangelands, BLM's population-management program has not been able to reduce the free-ranging horse population to the targeted AML. For 2012, the maximum AML for horses was 23,622 (the maximum AML for burros was 2,923).

Additional management interventions in the form of various fertility-control agents have been pursued to enhance the efficacy of population management. The emerging technologies have the potential to reduce population growth rates and hence the increment of animals added to the national population each year (see Chapter 4); this might substantially increase the opportunity for the removal program to attain management goals. The potential impact of fertility control, however, is limited by the number and proportion of animals that must be effectively treated with the contraceptive agents, and it is likely to affect the genetic makeup of populations unless carefully monitored (see Chapter 5). All modeling studies exploring the potential impacts of contraceptive treatments on horse population growth rates have demonstrated that the higher the intrinsic growth rate of the population, the higher the proportion of horses that must be treated to reduce population growth rates to a prescribed level (Garrott, 1991a; Garrott and Siniff, 1992; Garrott et al., 1992; Coughenour, 1999, 2000, 2002; Gross, 2000; Bartholow, 2007; Ballou et al., 2008). Thus, the potential implementation of broad-scale fertility-control management to aid in curbing population growth rates will be confronted by the challenge of treating the large number of horses that will probably be required to have appreciable effects on horse population demography. Studies specific to burro population demography will be necessary to tailor similar management actions to that species.

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3

Population Processes

The Bureau of Land Management (BLM) asked the committee to address the following questions as part of the discussion of potential rates of horse and burro population growth: Would free-ranging horse and burro populations self-limit if they were not controlled? If so, what indicators (such as rangeland condition, animal condition, and health) would be present at the point of self-limitation? To address those questions, it is necessary to review the factors that limit population growth in an unmanaged population¹ and that determine free-ranging horse and burro population growth and dynamics aside from management removals. Population growth and self-limitation are population processes in the sense that they involve a suite of underlying functions that lead to the result. The underlying functions include changes in natality and survival in response to environmental variables that affect forage availability, such as weather and population density.

The committee was also asked to assess whether there is compensatory reproduction as a result of population-size control, such as fertility control or removal from Herd Management Areas (HMAs). Compensatory reproduction is defined as an increase in reproduction as a direct or indirect consequence of management reductions, including removals and contraception. Indirect responses could include increased fertility, foal survival, or adult survival due to reduced competition for forage.

For self-limitation to occur, it is necessary for population processes to respond to population density (Figure 3-1). That is, population processes—such as population growth rates, age-specific survival rates, natality, and age of bearing first offspring (primiparity)—must be density-dependent. As density increases, population growth rate decreases because of increased competition for resources. Population processes are also altered by density-independent factors, particularly climatic conditions and variations. Natality and mortality can be affected by climatic conditions through direct effects on animals. Climatic conditions also affect resource abundance, for example, through effects on forage production.

¹Unmanaged populations of horses and burros are not domestic animals, and they are not fed or given veterinary care. Their numbers are not controlled by removals or contraception.

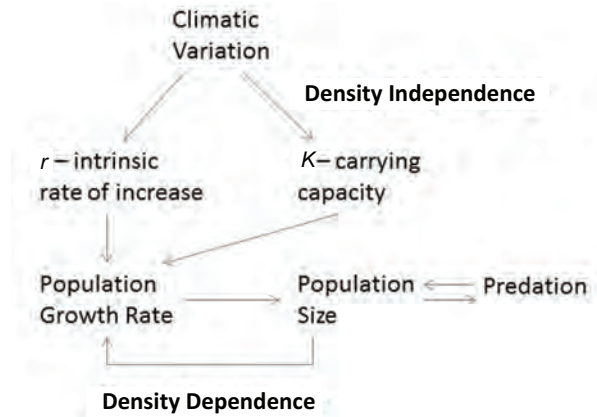


FIGURE 3-1 Population processes, including density-independent and density-dependent controls.

Population size can be reduced by predation, and predator abundance is affected by prey abundance. Population growth can also be affected by dispersal, immigration and emigration, and management factors, such as removal of animals from the range and contraception. This chapter examines the changes in population processes of free-ranging equids due to density-dependent, density-independent, predation, and management factors.

DENSITY-DEPENDENT FACTORS

It is a general principle of ecology that populations do not continue to grow indefinitely, but the mechanisms of reduction in growth as densities increase are not always well understood (Flux, 2001). Mechanisms may include competition for resources among members of the same species at high densities (Ginzburg, 1986; Berryman, 2003), complex social behaviors (Wynne-Edwards, 1965), and combinations of physiological responses to social cues (Wolff, 1997).

Density dependence can be seen most easily by examining the S-shaped curve of population size changing over time described by the logistic equation

$$dN/dt = rN([K - N]/K),$$

where dN/dt is the instantaneous rate of change in N , N is the size of the population (number of individuals), r is the intrinsic rate of natural increase, and K is the carrying capacity, that is, the maximum population size that the environment can support as affected by resource abundance. The discrete form of the equation defines the population increment over an interval of time, such as a year, and is expressed as

$$N_{t+1} = N_t + R(N_t[K - N_t]/K),$$

where N_{t+1} is the population size in the next year or generation, N_t is the population size in the current year or generation, R is the maximum rate of increase per year or generation, and K is the carrying capacity. The annual or generational increment can be defined as

$$\Delta N = N_{t+1} - N_t.$$

Early in the growth process there is a period in which population grows without limitation because the difference between N_t and K is so large that the density-dependent term ($[K - N_t]/K$) produces little constraint on ΔN (Figure 3-2A). At the inflection point (point α in Figure 3-2A), ΔN (point β in Figure 3-2A) is maximized, but as N_t approaches K , growth slows; it even becomes negative if N_t is greater than K .

The population trajectory represented by the logistic equation, as portrayed in Figure 3-2A, assumes that R and K do not vary over time. If, however, environmental variation is great and harsh conditions periodically reduce R or K independently of density, the importance of density dependence diminishes. If such variations are great enough, the population will rarely experience density dependence. Population sizes that are strongly affected by such density-independent factors show sawtooth-like increases and decreases and do not come to a steady equilibrium with resources. Density independence is explained further below.

Carrying capacity is a concept that has multiple definitions that depend on the situation. For populations of unmanaged large herbivores, carrying capacity is determined by resource availability, primarily food, so it is sometimes called the food-limited or ecological carrying capacity. Food-limited carrying capacity (K in the logistic model) can be determined empirically by letting a population grow until it comes into quasiequilibrium with the resource base. That idea of carrying capacity is different from the idea of carrying capacity discussed in Chapter 7, in which forage supplies are estimated and combined with an appropriate forage utilization level to set an appropriate management level (AML) in an attempt to preserve a thriving natural ecological balance. That is not to say that a population at or near K cannot result in a thriving natural ecological balance. However, the value of K will most likely be higher than the carrying capacity set in the AML process. Similarly, food-limited carrying capacity will be higher than the stocking rate that maximizes animal or vegetation productivity, which Caughley (1979) referred to as economic carrying capacity. For example, the maximum rate of animal production would be attained at point α in Figure 3-2B, which might be the objective if animals were being produced for sale or for hunting.

Numerous reviews and meta-analyses have shown that density dependence is common in large herbivore populations (Fowler, 1987; Sinclair, 1989; Gaillard et al., 2000). How density dependence affects individual animals and thus life-history traits varies with the ecological context, and effects are stronger in some age-sex classes than in others (Bonenfant et al., 2009). Effects of increased population density on reproduction are manifested through reductions in pregnancy, fecundity, twinning rate, number of offspring per female, percentage of females lactating, and young-to-female ratios and through an increase in age of primiparity, depending on the species, population, and environmental context. Survival rate responses to population density are common, but they vary among ungulate populations.

Effects of Density on Population Processes

Several studies of density dependence have included or focused exclusively on equids. In Kruger National Park, South Africa, adult and juvenile zebra survival rates were adversely affected by density and favorably affected by rainfall (Owen-Smith et al., 2005). Similarly, zebra population dynamics in Kenya were best explained by a model of rainfall-mediated density dependence (Georgiadis et al., 2003) that involved fecundity and survival. An unmanaged horse population in Argentina exhibited density-dependent responses. Reduced fecundity was the primary response to increased density. Adult female survival was also reduced at higher densities, but to a lesser degree (Scorolli and Lopez Cazorla, 2010). In a feral donkey population in Australia, fecundity was high and not related to

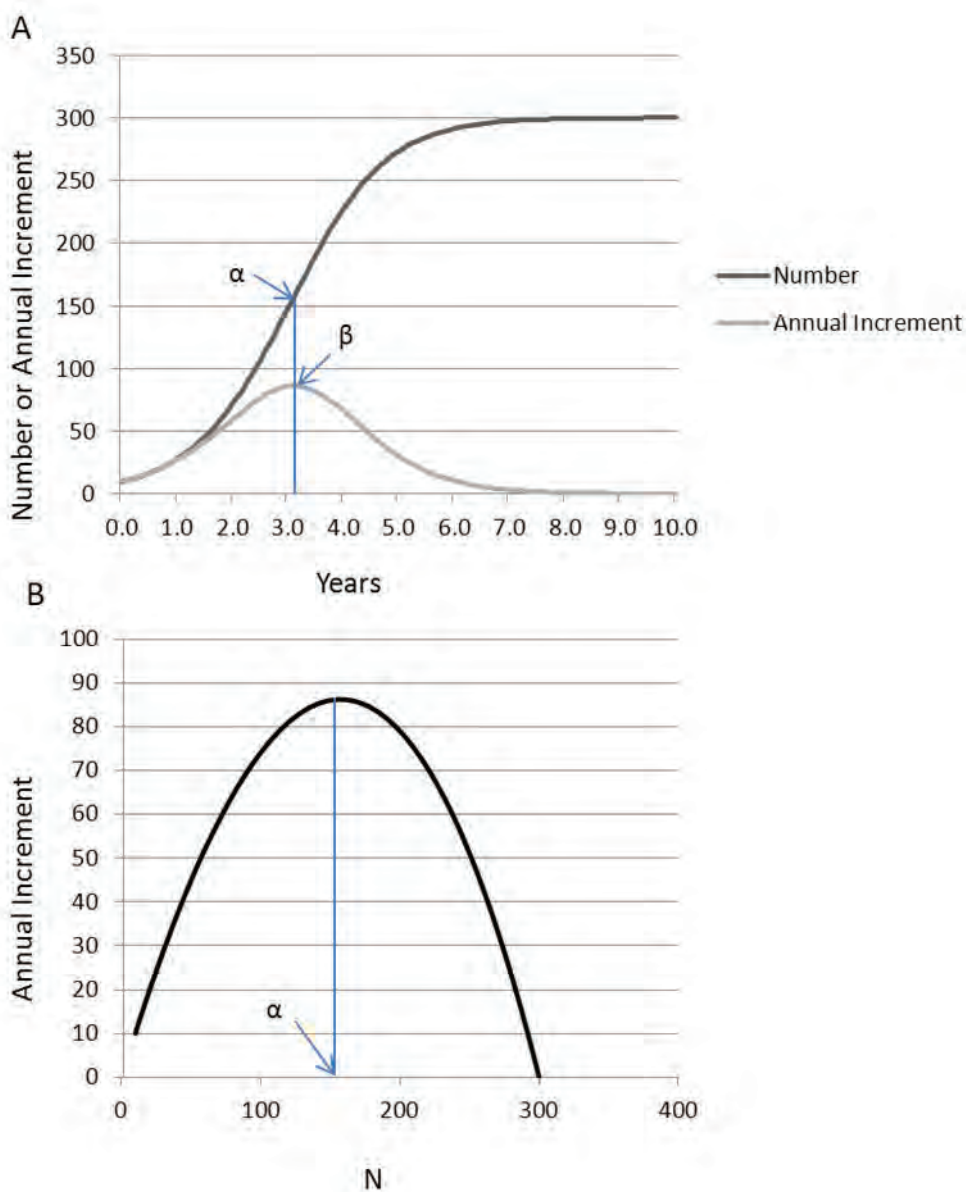


FIGURE 3-2 (A) Example of logistic population growth, with $R = 1.18$ and $K = 300$. Population size N and the annual population increment ΔN are plotted against time. Point α is the inflection point, at which population growth begins to decrease as the population approaches K . The corresponding point β shows that annual population increment is maximal at the inflection point. (B) Plot of annual population increment against population size, in which point α is the population size that maximizes the annual increment.

density; however, ages of males at sexual maturity and juvenile mortality increased at higher densities (Freeland and Choquenot, 1990; Choquenot, 1991; also noted in Bonenfant et al., 2009). Pregnancy rates declined at higher densities in horses in the eastern United States (Kirkpatrick and Turner, 1991). In Nevada, it was not uncommon for 2-year-old mares to foal, in contrast to earlier evidence indicating foaling did not begin until the age of 3 (Berger, 1986; Garrott et al., 1991). Garrott et al. (1991) argued that age at first reproduction is more likely to be earlier when forage is more abundant and when competition for forage is reduced. Jenkins (2000) analyzed data from the Granite Range and Pryor Mountain horse herds and reported evidence that population growth rate decreased with increasing population. Roelle et al. (2010) confirmed those findings in the Pryor Mountain horse herd. Thus, density dependence appears to take a variety of forms in equids.

Responses to density are often age-specific. Gaillard et al. (1998) reviewed evidence related to the conceptual model proposed by Eberhardt (1977) in which density effects on population vital rates (e.g., birth and death rates) would occur first in juvenile survival, then in age at first reproduction, then in reproductive rates of prime-aged (most highly reproductive) adults, and finally in adult survival. They noted that Fowler's (1987) review supported Eberhardt's model. The Gaillard et al. review provided further support of the model and reported that survival of prime-aged adults is relatively invariant whereas juvenile survival varies considerably from year to year. They reported that the pattern of high, stable adult survival and variable juvenile survival is observed in a wide variety of environments regardless of whether mortality is density-dependent or density-independent. They noted that higher annual variation in juvenile survival as compared to adult survival can arise from multiple causes including increased vulnerability to predation, drought, harsh winters, and factors causing low birth weights and early growth rates. In an unmanaged horse population in Argentina that was approaching carrying capacity, fecundity was affected by density and rainfall, but adult, juvenile, and foal survival rates were not (Scorolli and Lopez Cazorla, 2010). Although juvenile survival varies more than adult survival, population growth rate is highly sensitive to variations in adult survival, less sensitive to changes in juvenile survival, and moderately sensitive to changes in fecundity (Gaillard et al., 2000).

Possible Effects of Domestication

It is possible that domestication has selected for forms of density dependence that are different from those in undomesticated populations. Flux (2001) proposed that the tendency to self-regulate differs between feral and "wild-type" populations. It is believed that domestication of European rabbits by monks for over 600 years has led to feral populations that have been observed at densities of up to 200/ha in Australia and New Zealand (Thompson and King, 1994), whereas "wild" species seldom reach 4/ha. However, it is also likely that introduced rabbit populations in those locations are less affected by predation and disease. Other feral species also reach higher densities than their closest "wild" relatives, such as goats, pigs, cats, and domestic pigeons. Many of those species have been implicated in severely detrimental effects on habitats and native species (Flux, 2001).

Genetic history may contribute to the reproductive response of free-ranging equids to resource scarcity. A population of unmanaged horses in the Camargue (France) declined in body condition because of scarce resources, and this led to reduced foal and mare survival without a concurrent decline in fecundity (Grange et al., 2009). The authors pointed out that that pattern is different from the one in wild, nonferal ungulate populations, in which fecundity decreases well before adult survival as resources become more limiting. Other domesticated species, such as cattle, have shown the same pattern as the Camargue

horses. The authors argued that domestication has selected for reproduction over survival even when resources are scarce. As a result, feral populations are more likely to oscillate strongly, and the tradeoff of decreased adult survival may make them more vulnerable to harsh environmental conditions.

Nutritional and Physiological Mechanisms

Fowler's (1987) review indicated that food shortage is the primary factor in density dependence. The mechanisms through which food limitation affects population vital rates are most likely effects of poor nutrition, energy balance, and body condition on reproductive processes and survival rates (e.g., Gaidet and Gaillard, 2008). Poor nutritional status may also impair animal feeding and predator avoidance and increase susceptibility to adverse weather. Feral donkey populations in Australia were regulated by food-limited juvenile mortality, which in turn was related to the nutritional status of lactating females (Choquenot, 1991). In an unmanaged population of horses in the Australian Alps, population growth rate declined as numbers increased because of decreased fecundity and decreased adult and juvenile survival (Dawson and Hone, 2012). Those response variables were related to body condition and available food, and mean body condition correlated positively with forage biomass. In the Pryor Mountains, foal survival rate was positively related to precipitation, and this suggests a link to forage production and availability mediated through the condition of the mares (Roelle et al., 2010). The authors cited several other studies, including Garrott and Taylor's (1990) study of the horse populations in the Pryor Mountains, whose results suggested that forage availability can affect mare condition and thus foaling rates.

In addition to the total quantity of food, the quantity of high-quality food items may be diminished when populations are near carrying capacity. When an Australian donkey population reached carrying capacity, females ingested a diet of low nutritional value, whereas those in a population below carrying capacity were able to ingest a nutrient-rich diet (Freeland and Choquenot, 1990). Low diet quality resulted in low levels of stored nutrients in the females, which impaired their ability to raise offspring.

When resources are scarce, females are induced into anestrus as a result of poor body condition (Ginsberg, 1989). Birth sex ratios may be affected because mares in poorer condition have more female foals (Cameron et al., 1999). The effect of body condition on sex ratio probably occurs at conception. The age at first reproduction and reproductive rates of 2- to 4-year-old horses are affected by competition for forage, which reduces the amount of forage per individual and thus increases the time needed for individuals to attain sexual maturity (Garrott and Taylor, 1990). Saltz et al. (2006) reported that rainfall during the year before conception and drought conditions during gestation were important determinants of reproductive success in Asiatic wild ass. They focused on rainfall before conception because females in poor condition would not go into estrus.

To summarize, the causal pathways underlying density dependence begin with population size (Figure 3-3). Climatic conditions and spatial accessibility determine the availability of forage for herbivores. Population size affects the amount of forage available per animal: as population size increases, forage per animal declines; this results in reduced forage intake and reduced body condition, which affect survival rates and natality.

Behavioral Mechanisms

There are two fundamental mechanisms of behavior-mediated density dependence: increased dispersal at high densities and changes in social interactions that affect reproduction.

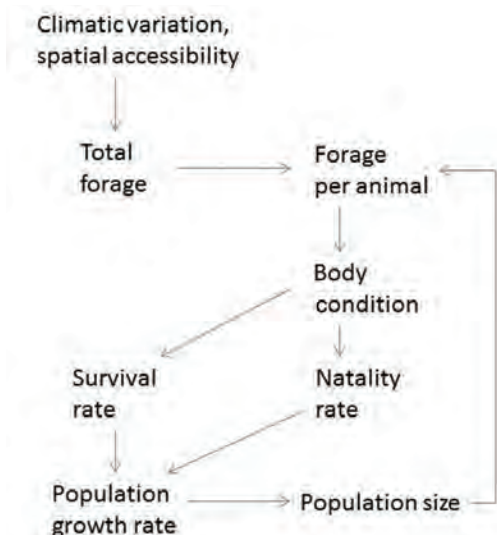


FIGURE 3-3 Nutrition-based mechanisms underlying density dependence and density independence.

The role of dispersal in density dependence remains uncertain because there have been few studies (Bonenfant et al., 2009). Duncan (1992) found no evidence of a social mechanism that regulates equid populations below levels determined by their food resources. However, others have found that increased social stress at high density may contribute to density dependence (Linklater et al., 2004). Tatin et al. (2009) found that reduced space can slow the growth of a population of a Przewalski's horse herd before forage becomes limiting. They suggested that reproduction decreased as a result of mare dispersals to avoid inbreeding (Monard and Duncan, 1996).

Where populations are spatially unbounded, dispersal can forestall density-dependent control as long as there are places where populations are small and individuals in crowded locations can disperse (Owen-Smith, 1983; Pulliam, 1988). Such source-sink population complexes where emigration keeps densities low will be common where environmental forces—ranging from physical factors, such as climate, to biological factors involving predators—operate over large areas. But where there are boundaries to dispersal, as on natural islands or habitat islands created by human landscape change, densities can increase to a point at which feedback from crowding lowers fecundity and adult and juvenile survival.

Crowding changes behavior in many ways among horses and burros. In Nevada, high equid densities were associated with increased incidences of confusion, separation, and desertion of foals by mares at water points in the dry season (Boyd, 1979). Berger (1983b) reported that social instability, specifically high rates of turnover among harem males, adversely affect female reproductive success and patterns of age-specific fecundity. He also indicated that increased levels of sexual harassment can lower female body condition and disrupt normal endocrine function. By virtue of their hindgut fermentation system, equids can subsist on low-quality vegetation, and they typically compete by maximizing intake relative to other animals (Rubenstein, 1994). However, when densities increase, individual agonistic interactions increase, and this reduces time available for foraging and thus competitive ability. Equid females rely on male protection to increase time spent in feeding, and

this increases the likelihood that foals will survive to the age of independence (Rubenstein, 1986). Thus, any interference that impinges on a female's ability to forage can lower body condition and reduce fecundity and survival. Moreover, because band stability increases a female's long-term reproductive success (Rubenstein and Nuñez, 2009), disturbance that leads to more rapid turnover in the tenure of harem males or increased competition among females that leads to female movements among groups will alter important demographic vital rates.

Including Density Dependence in Models

Density dependence has been considered in a number of models of ungulate population dynamics. The trajectory of an unmanaged population of horses in Argentina was successfully modeled by fitting a simple logistic equation with a best-fit intrinsic rate of increase and carrying capacity (Scorolli and Lopez Cazorla, 2010). Georgiadis et al. (2003) developed a model of zebra populations that included density dependence in the form of a ratio of rainfall (as a surrogate of food availability) to density. The inclusion of that density-dependent term improved model accuracy despite the large fraction of variation that was explained by rainfall alone. Rubenstein (2010) modeled Grevy's and plains zebra populations. Density dependence was solely through age at first reproduction, inasmuch as population growth rate is very sensitive to the number of 3-year-olds reproducing. Overall fecundity was linked to annual rainfall. Density dependence was statistically significant in models of four horse populations (Eberhardt and Breiwick, 2012): *Equus ferus caballus* in Argentina (Scorolli and Lopez Cazorla, 2010), the Camargue (Grange et al. 2009), and Oregon (Eberhardt et al., 1982) and *Equus ferus przewalskii* in a fenced area in France (Tatin et al., 2009).

Density dependence in the population dynamics of Serengeti wildebeest was modeled by Mduma et al. (1999). Density dependence was most strongly exerted through adult mortality, and the primary cause of death was undernutrition. Thus, mortality was modeled as a function of food per capita, and food supply was modeled as a function of rainfall. The model predicted a period of population growth following a period when population size was reduced below food-limited carrying capacity by rinderpest.² Projected population dynamics varied within a wide range as a result of rainfall and food-supply variation, but the projected population nevertheless reached maximal levels because of density-dependent feedback.

Lubow et al. (2002) fitted a series of alternative population projection models to population data on elk in Rocky Mountain National Park. Logistic regression was used to estimate recruitment (the number of individuals added to a population through births) and survival rates of calves and survival rates of each sex and age segment as functions of population size and seasonal temperatures and precipitation. Because of the effects of population density in the models, populations stabilized at some upper limit, which the authors identified as the carrying capacity. The primary mechanism of density feedback was a nearly linear decline in calf recruitment followed by sharply declining calf survival.

An approach to the modeling of time-varying carrying capacity for Yellowstone elk populations was based on temporal variations in food availability (Wallace et al., 1995, 2004; Coughenour and Singer, 1996b). Food availability was affected by spatial heterogeneity, spatial overlap of elk, and spatially variable food availability. The latter was affected by the distributions of snow depth across the landscape throughout winter, which was affected

²An often fatal viral disease that affects even-toed ungulates.

by snowfall and temperature, which in turn were related to elevation. The effect of snow depth on forage-intake rate was explicitly represented. An energy-balance model was used to derive temporal changes in elk body condition (fat reserves) on the basis of the balance of energy intake and expenditure. Mean body condition was used to determine the fraction of animals in a normally distributed population that would die because of extremely low body condition—an approach originally developed by Hobbs (1989).

A similar idea was extended into actual population-dynamics modeling. A metaphysiological modeling approach was developed to represent the effects of energy storage on population dynamics (Getz and Owen-Smith, 1999; Owen-Smith, 2002a,b). Because animals and plants can store energy in body tissues, they have a reserve for use in times of food shortage. The approach links animal energy reserves to population dynamics; the reserves alter population dynamics, for example, through an increase in mortality when there are food shortages in the environment.

In an ecosystem modeling approach (Coughenour, 1992, 1999, 2000, 2002; Weisberg et al., 2006), the energy balance of the herbivore population is simulated as an outcome of forage intake and energy expenditure. The energy balance determines storage (fat) reserves, a measure of body condition. Condition in turn affects survival and fecundity. Forage intake depends on forage-biomass density, which establishes a link between population dynamics and forage. This type of model is explained in greater detail in Chapter 6.

Some equid population modelers have avoided considering density dependence and food-limited carrying capacity because populations are limited by other factors. Saltz and Rubenstein (1995) modeled Asiatic wild ass populations with a Leslie matrix, but because the populations were so small relative to the expansive area available, it was unlikely that density dependence was important, so it was not included in the model. Although the WinEquus model that is used by BLM has the capability to consider K (carrying capacity), it is rarely invoked in most BLM applications of the model because populations are always held below food-limited capacity by management removals (see Chapter 6). Gross (2000) ignored food limitations and carrying capacity in his individual-based model of the Pryor Mountain herd. He presumed that horse populations will be managed below food-limited carrying capacity and therefore not allowed to self-regulate. Linklater et al. (2004) also did not attempt to consider density dependence in their model, although it was useful for estimating population growth rates below carrying capacity.

The assumption that most BLM-managed populations are below food-limited carrying capacity and thus unaffected by density dependence appears to be reasonable given that management has heretofore aimed to ensure the prevention of rangeland deterioration, largely interpreted as preventing overuse of the forage and habitat (see Chapter 7). However, an outcome of this situation is that few data or modeling studies have provided information on outcomes of density dependence in horse or burro populations on lands under the purview of BLM. Although density dependence has not been a concern in BLM-managed HMAs and models, it will be necessary to include it in any model that addresses the question posed to the committee regarding self-limitation.

DENSITY-INDEPENDENT POPULATION CONTROLS

Large herbivore population dynamics are generally influenced by a combination of stochastic environmental variation and population density (Saether, 1997). Unmanaged or minimally managed populations should be expected to fluctuate about some mean tendency in quasiequilibrium, and the degree of fluctuation will depend on the degree of climatic variability. The dynamics of more intensively managed populations can also

be expected to vary in response to density-independent factors, inasmuch as density-independent effects are in play irrespective of whether populations are managed to levels below which density dependence takes effect.

Density independence is often incorporated into predictive models of equid population dynamics. Saltz et al. (2006) applied a Leslie matrix model with demographic and environmental stochasticity to an Asiatic wild ass population in Israel. Annual precipitation during the year before conception, drought conditions during gestation, and population size determined reproductive success. They reported that increased rainfall variability in global climate-change scenarios increased extinction probability by a factor of nearly 10. The widely used WinEquus population model (see Chapter 6) incorporates density independence as stochastic variation in recruitment and survival. At the other end of the model-complexity spectrum, the ecosystem modeling approach described in Chapter 6 represents density independence by simulating climatically driven variations in forage production and effects of snow cover on forage availability.

Effects of Climatic Variability

Variable precipitation and winter weather conditions can have marked effects on horse and burro population dynamics. Precipitation affects equids indirectly through its effect on total forage biomass production and the length of time that forage remains green and more highly nutritious (Figure 3-3). Winter weather can act directly on horses and burros through thermal stress, but more often it acts indirectly as snow cover affects forage availability.

A stage-structured model of an elk population in Yellowstone that included calf, cow, and bull elk classes modeled recruitment and mortality of each class by using the best equations determined from forward, stepwise multiple regression analyses and using precipitation amounts and elk number as the independent variables (Coughenour and Singer, 1996a). Winter precipitation was a surrogate for snow cover and later forage availability. The model revealed that expected population trajectories should exhibit wide variation in response to this density-independent regulation. Although a population equilibrium could be predicted and could be interpreted as one measure of food-limited carrying capacity, there was considerable variation above and below the equilibrium value. A series of mild winters, for example, could result in population sizes above mean K , and the converse would be true in a series of severe winters.

Precipitation appears to have a substantial influence on equid populations. Berger (1986) could find little evidence of density dependence in his data on the Granite Range HMA and suggested that responses to weather variations were overriding and confounding. Roelle et al. (2010) reported that foal survival rate in the Pryor Mountain Wild Horse Range was positively related to precipitation, probably because of the effects of variable forage production on mare condition. They noted that other investigators had suggested that forage availability can affect foaling rates in this manner (Green and Green, 1977; Nelson, 1978; Berger, 1986; Siniff et al., 1986; Garrott and Taylor, 1990). Horse populations in Australia possibly increased by a factor of 4 during good rainfall years in the 1970s (Berman, 1991), and dry conditions and more intense management reduced the population by 70 to 80 percent in the central part of the country. A 10- to 20-percent birth rate is probably realistic in poor years, and a 25- to 30-percent birth rate in good years (Berman, 1991). Joubert (1974) observed lower recruitment rates in a zebra population in dry years and a large dieoff during a drought. Owen-Smith et al. (2005) reported that juvenile survival was sensitive to rainfall variability in most of 10 African ungulate species, and there was no evidence of density dependence. Rainfall also affected adult survival in several declining species.

Density-independent mortality was documented by Berger (1983a) in the Granite Range of Nevada. Two horse groups perished as a result of severe winter snowstorms. High-altitude, snow-induced mortality may be common. He concluded that unpredictably heavy snow accumulation is a principal mortality agent in the Granite Range, as it may be elsewhere in the Great Basin. Berger (1983a) referred to the winter of 1977, when an estimated 300 horses (50 percent of the population) died in the Buffalo Hills near the Granite Range. Berger (1986) reported a pattern of low mortality in most years but markedly higher mortality in occasional years of bad weather. In Wyoming's Red Desert, abortions and stillbirths after a severe winter reduced natality by one-third (Boyd, 1979).

Reduction in Equilibrial Tendencies by Density Independence

In climatically variable environments, the importance of density-independent population dynamics increases. The implication of strong density independence is that, in climatically variable environments, herbivore populations should not be expected to reach a steady state in which population density is in stable equilibrium with forage production. Climatic variations include severe winters and droughts. When the coefficient of variation of annual rainfall, and presumably food availability, exceeds 30 percent, population size is less likely to be determined by mean food-limited carrying capacity (Caughley, 1987; see also the section "Understanding Ecosystem Dynamics" in Chapter 7). Saether (1997) also theorized that lags in the responses of populations to environmental variations, in the absence of predation, will make a stable equilibrium between ungulates and their food resources unlikely. As a result, horse populations may not necessarily decline rapidly during moderate droughts despite reductions in plant growth, and the grazing pressure, expressed as a percentage offtake, may periodically increase above average values.

Ellis and Swift (1988) proposed that plant-herbivore systems in climatically variable environments are unlikely to be equilibrial and that traditional concepts of food-limited carrying capacity have relatively little value in predicting herbivore population sizes and dynamics in such environments. They proposed that a herbivore population in an environment subject to periodic droughts is periodically reduced to a low level independently of density. The population then recovers slowly until the next drought causes another reduction. As a result, the population is kept below food-limited carrying capacity—it is unable to use available food resources fully because of low density. That idea was supported by a model of zebra population dynamics (Georgiadis et al., 2003) that provided realistic predictions for 2 decades (Georgiadis et al., 2007). The model captured the fundamental mechanism of rapid population decline during dry periods and slow increase during wet periods. The greater the variability in rainfall, the greater the proportion of time that the population spends below carrying capacity.

The Ellis and Swift (1988) study generated controversy: some interpreted it to suggest that plant-herbivore systems would be generally nonequilibrial and herbivore populations would naturally be held below food-limited carrying capacity and thus below sizes that would cause overgrazing and degradation. The conclusions of Ellis and Swift, however, were limited to environments that had a high degree of climatic variability, and the implication was that such systems have nonequilibrial tendencies, not that they are absolutely nonequilibrial. Illius and O'Connor (1999, 2000) showed that herbivore populations in drought-prone environments would be "disequilibrial," still in quasiequilibrium with critical food supplies during dry periods. Thus, plant resources should appear to be lightly used during wet periods, and on the average a small fraction of plant growth should be used. Illius and O'Connor recognized the importance of key resource areas on the

landscape, such as natural dry-season grazing reserves that define the dry-season bottlenecks and thus limit herbivore populations to a particular density. Density dependence therefore exists, but it is temporally variable inasmuch as food-limited carrying capacity varies with precipitation and, in seasonally cold environments, with snow cover.

EFFECTS OF PREDATION

Predators prey on wild equids; predation on onagers and zebras has been reported in Asia (Solomatin, 1973) and Africa (Kruuk, 1972; Schaller, 1972), respectively. In Africa, predation may limit some zebra populations (Sinclair and Norton-Griffiths, 1982; Mills et al., 1995). Zebras and other ungulates were not limited by food in Namibia but most likely by predation or disease (Gasaway et al., 1996). Zebra maintained excellent body condition during dry seasons and after droughts. Recruitment rates continued to be high, corresponding to those of a growing population. Such recruitment rates could be balanced only by high rates of yearling and adult mortality, which would presumably be caused by predation or disease. Predation was suspected of being a major population control in a collection of ungulate populations in Kruger National Park (Owen-Smith et al., 2005). Adult zebra survival was strongly related to increasing density, but the steepness of the response indicated that it was strongly affected by prey-switching by lions in response to decreased availability of alternative prey species. Mills et al. (1995) reported that zebra populations in Kruger were influenced by predation but to a smaller extent than wildebeest or buffalo. However, rainfall was the primary determinant of zebra population dynamics. In Serengeti National Park, Tanzania, zebra populations have remained roughly constant for decades, despite large changes in wildebeest and other bovid numbers caused by a rinderpest epidemic (Sinclair and Norton-Griffiths, 1982; Grange et al., 2004). Very low first-year survival limits the zebra population in the Serengeti, according to Grange et al. (2004), who found evidence that rates of predation on zebras were high and hypothesized that predation potentially holds the population in a "predator pit." The principal predators, lion and spotted hyena, feed mainly on adult zebra, so it was not clear what the main sources of foal mortality were. Using data from 23 near-natural ecosystems in Africa, Grange and Duncan (2006) reported that zebra abundance relative to that of bovids is lower in ecosystems that have high lion densities and that zebra abundance is not as affected by forage abundance as bovid abundance; this suggests that zebras are more sensitive to predation than are bovids. Rubenstein (2010) reported that 73 percent of lion dung samples contained Grevy's zebra and 53 percent contained plains zebra hair. One wildlife conservancy had high rates of lion predation on zebra.

Wolves are quite capable of preying on equids. In southern Europe, equids constituted 6.2 percent of wolf diets (range, 0-24 percent) (Meriggi and Lovari, 1996). In Abruzzo National Park, Italy, horses constituted 70 percent of wolf diets; however, unguarded horses are commonly hobbled in that area to prevent long-range movements (Patalano and Lovari, 1993, cited in Meriggi and Lovari, 1996). In northwestern Spain, a population of free-ranging ponies is heavily preyed on by wolves (Lagos and Barcena, 2012). Foal survival rate was very low (0.41), and 76 percent of foal carcasses found were killed by wolves. Van Duyn et al. (2009) reported that wild Przewalski's horse foals were killed by wolves in Hustai National Park, Mongolia, and cautioned that predation could influence translocation efforts. However, those horses are sufficiently vigilant to survive and reproduce, so perhaps they have not lost essential skills (King and Gurnell, 2012). Wolves in a multiprey system have been reported to prey on feral horses in Alberta, Canada. Webb (2009) reported that one of 36 kills by wolves included a feral horse. Webb (2009) located 192 ungulates that had

been killed by wolves in 11 packs from 2003 to 2006. Some 7 percent were feral horses, and they made up 12 percent of the total biomass consumed (0.01 ± 0.02 feral horse/pack per day). Despite evidence that wolves prey on equids elsewhere, the committee was unable to identify any examples of wolf predation on free-ranging equids in the United States.

Most predation on free-ranging equids in North America has been attributed to mountain lions. That has been reported by Robinette et al. (1959) and Ashman et al. (1983). Berger (1983c) cited an unpublished report of 21 cases of mountain lion predation on free-ranging horses in the Great Basin; those deaths spanned more than 20 years and had negligible effects on population growth. Feral (but not free-ranging) horses constituted 11 percent of mountain lion diets in Alberta (Knopff and Boyce, 2009). Horses constituted 10-13 percent of adult male lion diets, but female lion diets were almost devoid of horses (Knopff et al., 2010). Overall, mountain lion predation on free-ranging equids in North America is, with few exceptions, considered uncommon (Berger, 1986).

One of the exceptions is the free-ranging horse population on the central California-Nevada border. Turner et al. (1992) examined foal survival rates in the area (the Montgomery Pass Wild Horse Territory managed by the U.S. Forest Service) because there was a ban on mountain lion hunting in California and low hunting pressure in Nevada that led to a high density of mountain lions. The study was conducted from May 1986 to July 1991 by examining the horse and mountain lion populations and documenting deaths of horses. The average annual cohort of foals over the 5 years was 32. The annual survival rates were calculated for foals (0.27), yearlings (0.95), and adults (0.96). From 1987 to 1990, 48 foals were lost; 58 percent were located as carcasses and 82 percent of those were killed by mountain lions. The authors concluded that mountain lion predation had a substantial effect on the demography of that free-ranging horse population. The study was continued, and Turner and Morrison (2001) used 11 years of data (1987-1997) to examine again the influence of mountain lions on the horse population in Montgomery Pass Wild Horse Territory. Their results supported the earlier work of Turner et al. (1992): mountain lions were responsible for the deaths of 45 percent of the foals that were born. Mountain lion predation was also hypothesized as a major factor in limiting horse population growth in an area of southern Nevada where they use high-elevation forested habitats in summer (Greger and Romney, 1999). Those habitats are excellent for mountain lions because of their broken topography.

By and large, research that has addressed the question of predation on free-ranging equids in North America has been limited to anecdotal observations and a few published papers, but at the time of the committee's review, studies at the University of Nevada, Reno, that should provide more quantitative data were under way. The work in several mountain ranges of western Nevada was examining predation by mountain lions in multiprey systems in which free-ranging horses had various densities. Diet data were being obtained by using information from GPS-collared mountain lions to investigate predation events; more than 700 predation events had been investigated as of June 2012. Ten of 13 collared mountain lions that had access to free-ranging horses regularly consumed horses as prey. Horses were documented to have been consumed as prey by collared mountain lions in eight mountain ranges throughout the study area in western Nevada (Virginia, Pah Rah, Fox, Lake, Wassuk, and Excelsior ranges and Virginia and Smoke Creek Mountains). Preliminary data suggest that in that study area, where free-ranging horses are available as prey, more than 50 percent of the diet of collared mountain lions is made up of horses when diet data on individual mountain lions are pooled. Preliminary results suggest that mountain lions in that multiprey system are generalists at the population level but that some diet specialization occurs at the individual level: some lions select for deer where horses are more abundant, and some select for horses to the near exclusion of other prey items where

mule deer, bighorn sheep, and domestic animals are present. There is also some evidence that the magnitude of predation on horses by mountain lions may be related to the density of free-ranging horses, greater predation on horses occurring where densities of horses are higher (Andreasen, 2012).

The potential for mountain lions to affect the sizes of populations of free-ranging horses in North America is limited by the fact that most HMAs are in areas that have few mountain lions. The ranges of mountain lions tend to be concentrated in forested areas and at higher elevations (Kertson et al., 2011) and in areas that have mountainous or otherwise broken topography with limited viewsheds. In contrast, many horse populations favor habitats that have more extensive viewsheds. Mountain lions are ambush predators and require habitats that provide opportunities for stalking or finding prey without being seen. Other predators, such as wolves, are more cursorial—capable of pursuing prey across open habitats.

That a large predator, when abundant, can substantially influence the dynamics of free-ranging horses is not surprising inasmuch as black bears (Zager and Beecham, 2006), mountain lions (Wehausen, 1996), and other predators (Ballard et al., 2001; Boertje et al., 2010) have exerted strong influences on ungulate populations. However, the influence of predation on horses in the western United States is considerably limited by a lack of habitat overlap both with mountain lions and with wolves. Another constraint is that among free-ranging horse populations, foals are the usual prey, and predation on adults has rarely been documented until the recent studies in Nevada. Population size is not affected as much by foal survival as it is by adult survival (Eberhardt et al., 1982), and foal survival is strongly affected by other variables (such as weather).

CONSEQUENCES AND INDICATORS OF SELF-LIMITATION

If a population of herbivores were to self-limit, effects on the ecosystem would be expected. This section reviews the theory, expectations, and case-study examples of free-ranging horses in self-limiting circumstances.

Theory

Riney (1964) and Caughley (1970, 1976) proposed that, on introduction of a large herbivore into an ecosystem not previously occupied, there would be an initial irruption of the population that would lead to a decline in vegetation conditions, which would in turn lead to a decline in the herbivore population and allow partial vegetation recovery (Figure 3-4). The herbivore-vegetation system would then reach a new equilibrium between plant productivity and herbivore population density in which vegetation productivity and cover may be less than that in a system that does not have herbivores or in a system that is managed for maximal herbivore productivity. The resulting plant-herbivore system may be less productive, have less standing herbaceous biomass, and have a different plant species composition, but it may nevertheless be functional and sustainable. That conceptual model assumes that the vegetation-soil system has the capacity to persist in some form through and beyond the initial period after an introduction, in which it has been heavily used and reduced in function. It also assumes that surviving vegetation components would be adapted to withstand recurrent herbivory and would increase in relative abundance to form a plant community that is more adapted to withstand herbivory. As noted in Chapter 7, under some conditions, productivity of herbivory-adapted plant species may not be reduced by herbivory.

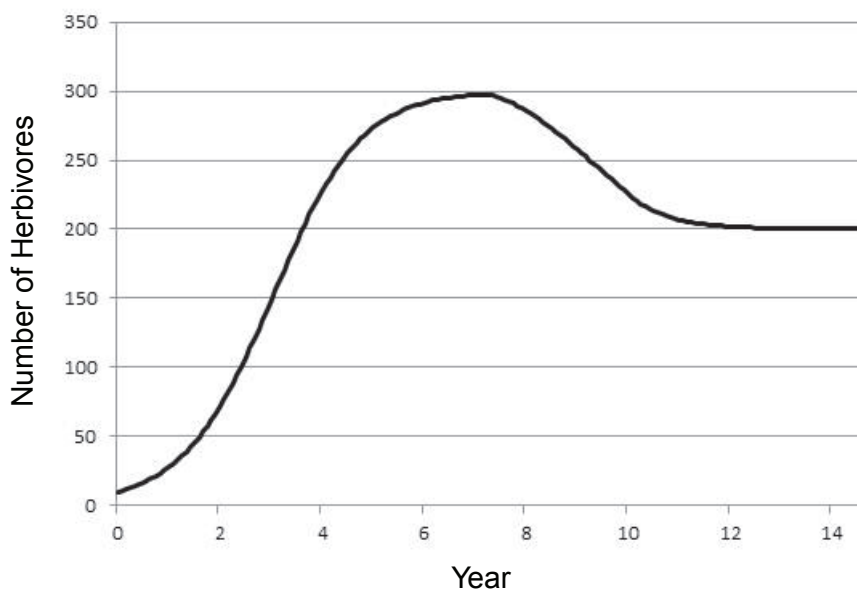


FIGURE 3-4 Large-herbivore population trajectory after an introduction. Herbivory causes a decline in plant production and thus in K . Here, K in the underlying logistic model declines linearly from 300 to 200 individuals from year 7 to year 10, and this results in a decline in herbivore population size.

General Expectations

There is no doubt that large herbivores have numerous effects on their environments that result from grazing, browsing, trampling, and behavioral and competitive interactions with other species (see Chapter 7). When the population is food-limited and population growth rate decreases to zero, the forage resource base will most likely be heavily grazed. Horses and burros have the ability to graze plants down to the ground. They can kill plants through uprooting and trampling, create areas of low vegetation cover, and change plant species composition to favor less desirable or exotic species. At some point, reduced vegetation cover can lead to accelerated soil erosion and decreased vegetation productivity and rangeland health (NRC, 1994; Pellant et al., 2005). If resulting feedbacks to equid population growth are ineffective or if they have been disrupted by human activities, rangeland ecosystems can be pushed across thresholds into degraded states from which recovery is difficult or impossible (see Chapter 7).

Grazing pressures can be expected to be spatially heterogeneous. In expansive habitats, it is simplistic to think of a mean grazing pressure uniformly distributed across the landscape; a variety of factors affect animal distributions beside forage. It is more realistic to expect that some areas will be heavily, perhaps “excessively,” grazed while other areas are little used and may serve as refugia for plant species that are more sensitive to grazing by large herbivores. The heavily used, disturbed areas are, however, also refugia for disturbance-adapted plant species. One example is the existence of increased levels of disturbance near water sources. Such areas have sometimes been referred to as sacrifice areas

because they are an inevitable outcome of the presence of large herbivores, their requirements for water, and the fact that water is distributed at point locations.

It can be expected—on the basis of logic, experience, and modeling studies cited above—that because horses or burros left to “self-limit” will be food-limited, they will also have poorer body condition on the average. If animals are in poorer condition, mortality will be greater, particularly in times of food shortage resulting from drought or severe winter weather. Indeed, when population growth rate is zero, mortality must balance natality. Whether that is acceptable to managers or the public is beyond the purview of the committee, but it is a biological reality.

It is difficult to generalize about whether these are natural and expected outcomes in unmanaged large-herbivore or, more specifically, free-ranging equid ecosystems. On the basis of evidence presented above, many large-herbivore populations are regulated through food limitation as a natural process. The evidence reviewed above also indicates that predation is a factor in some large-herbivore populations and some equid populations. Most horse and burro populations in North America appear to be little affected by predation because predators are absent or present at low densities, possibly because they have been extirpated or simply because habitats are not suitable for them. The degree of naturalness is also affected by other human activities, such as restrictions on dispersal and other movements, the presence of livestock, and water development.

Case Studies

The only way to know the consequences of self-limitation for the vegetation, horses and burros, and the ecosystem is to observe the consequences where self-limitation has been allowed to occur. As pointed out above, there are few cases in which free-ranging horse populations have not been managed and have been left to self-regulate and in which simultaneous scientific studies of the vegetation and of the equids have been carried out. But there are probably many cases in North America in which equid populations have gone unmanaged, or have been minimally managed, for a number of years. In some cases, the equids have been studied but their effects on habitats have not (e.g., Berger, 1986). In other cases, the equids and their effects on landscapes have not been studied. Some unmanaged populations on tribal lands have received little or no scientific study.³

The responses of equids to a situation of self-limitation have been discussed above with regard to density dependence. As noted, density dependence results from food limitation, a decline in animal nutritional condition, and consequent decreased recruitment and survival rates. Many examples of equid ecosystems around the world were given. Chapter 7 reviews the numerous effects that horses have on their habitats and on other species and examines the concepts of thriving natural ecological balance and AMLs. Horses will have some effects on their habitats at the point of food limitation, and these could be pronounced. On the basis of studies of systems that have high densities of horses, although not necessarily at the point of food limitation, reasonably well-informed hypotheses can be developed about the expected state of vegetation and other species when the equid population reaches the point of self-limitation. However, whether such a system can be self-sustaining (or perhaps even “thriving”) over the long term cannot be known without experimentation.

³For example, Yakama Nation in Washington, available online at <http://www.ynwildlife.org/>.

New Zealand

Free-ranging horses in New Zealand are derived from animals introduced from various sources in the 19th and 20th centuries (Rogers, 1991). They once ranged over much of the central North Island but have diminished since the 1950s. The only remaining population survives in the Kaimanawa Mountains because of restricted public access on military lands. The Kaimanawa unmanaged population was continuing to increase and had not reached food limitation as of 1990 (Rogers, 1991). However, in the southern portion of the area, horses were expanding their ranges in response to increased density. The most important habitats for horses included wide basins with areas of volcanic ash supporting tall red tussock and short hard tussock grasslands. Grazing by domestic sheep, cattle, and horses and burning since the 1890s converted tall red tussock to short tussock grasslands.

A 20-m x 20-m grazing enclosure in degraded short tussock grassland resulted in changed plant species composition. The dominant intertussock grass species increased while 12 low-stature species and total species diversity decreased as the hard tussock species increased in stature and shaded them. Adventive (introduced) species also expanded. It is notable that the tall red tussock grass decreased. The enclosure also showed that grazing was not reducing the recruitment of hard tussock. Thus, cessation of horse grazing did not restore the original red tussock species, so the vegetation might have been converted to an "alternate stable state" as explained in the section "Understanding Ecosystem Dynamics" in Chapter 7. Furthermore, cessation of grazing resulted in adverse changes in species composition toward the adventive species, and this indicates that a moderate level of grazing would maintain the more desirable hard tussock grassland physiognomy (appearance) and species composition.

Vegetation responses to horses varied from north to south. In the north, where horse numbers were low, in the most prevalent habitats, red tussock appeared to be slowly recovering from the degradation resulting from early European livestock. In some habitats in the north, particularly mesic sites, horse grazing continued to have substantial adverse effects on biodiversity. In contrast, in the south, the landscape was more resilient to horse grazing because of the changes in species composition that had resulted from prior European livestock grazing. Thus, it might be concluded that exposure to grazing in the south had changed the plant community to one that is more resilient, and thus adapted, to further grazing by free-ranging horses. Moreover, the persistence of the hard tussock physiognomy (appearance) depends on continued moderate grazing.

Balancing free-ranging horses with the conservation of biodiversity across the landscape depends on the recognition of spatial heterogeneity between the north and south. In the south, Rogers (1991) concluded that horse preserves could be recognized where their numbers could be manipulated for the benefit of the horses and indigenous landscapes. In the north, however, he concluded that horse grazing compromises nature conservation values, so their numbers may have to be controlled.

It should be noted that no mammalian herbivores were present in New Zealand before the introduction of domesticated livestock by European settlers. Consequently, the responses of vegetation in New Zealand to introduced mammalian herbivores could differ from responses of vegetation that has coevolved with mammalian herbivores.

Central Australia

Berman (1991) studied populations of feral horses in central Australia. Aerial surveys in 1981 and 1984 indicated that there were about 206,000 animals. Populations may have

quadrupled during a period of good rains in the 1970s, but drier conditions, decreased rangeland availability, and management more recently have reduced the population by 70-80 percent. That suggests that horse populations increased and then decreased in response to forage availability; horses might have been above food-limited carrying capacity in dry conditions. Berman observed that variations in vegetation, wildlife, and soil erosion corresponded with changes in grazing intensity. High densities were associated with denudation, low densities of kangaroos, water holes with horse carcasses, and increased gully erosion. Horse and cattle dung density and gully erosion decreased with distance from water while plant cover and kangaroo dung increased with distance from water. Feral horses were able to affect almost all rangeland areas in central Australia because they are able to walk up to 50 km from water and traverse hills, which are barriers to cattle. Berman noted that many examples of soil erosion exist in parts of central Australia; although these have often been attributed to overgrazing by horses and cattle, it is difficult to prove that horses and cattle cause a substantial amount of erosion because erosion also takes place without them in these environments. Horse and cattle diets and habitats overlap, so it was not possible to differentiate vegetation and soil responses that were due to horses rather than cattle.

Argentina

In the Pampean grasslands of Ernesto Tornquist Provincial Park, Argentina, an unmanaged population of horses increased according to a logistic curve and was beginning to show signs of density dependence, as noted above (Scorolli and Lopez Cazorla, 2010). Although density had no effects on survival, it affected fecundity. The authors hypothesized that fecundity was reduced at higher densities because of reduced pregnancy in mares that had low body condition. De Villalobos and Zalba (2010) and de Villalobos et al. (2011) reported that the horses reduced herbaceous cover and facilitated establishment of an invasive pine species. They suggested that grazing had caused reduced plant diversity and species evenness and altered the composition of communities. Other native and exotic ungulate species had declined as a result of competition with the horses.

Shackleford Banks

Shackleford Banks, a barrier island off the coast of North Carolina, supports a population of free-ranging horses that has experienced increases and decreases in population numbers in response to changes in carrying capacity resulting from management practices. Before the National Park Service (NPS) acquired the island and incorporated it into the Cape Lookout National Seashore, free-ranging horses shared the island with domestic livestock, including cattle, sheep, and goats (Rubenstein, 1981). After NPS removed all domestic stock from the island in the late 1980s, free-ranging horse numbers more than doubled from a competitively determined, food-limited carrying capacity of 104 animals to a new level, without competition from livestock, slightly over 220. That provided an opportunity to witness changes in behavior and vital rates when density-dependent effects were removed and reappeared as the population expanded. At first, body-condition scores increased from 3.5 to over 4 (on a 1-5 scale, with a score of 1 representing a horse in poor condition) as food previously consumed by livestock was now being eaten by horses. Fecundity also increased slightly, the interbirth interval declined from about 3 years to slightly more than 2 years and mortality in adult and juvenile males and females dropped 15 percent (Rubenstein and Dobson, 1996). However, as the population reached the new carrying capacity, those patterns reversed, and vital rates returned to their previous equilibrium levels.

Observable declines in body condition and increases in mortality, especially after hurricanes and winter storms, prompted the development of a plan for population control (Rubenstein and Dobson, 1996). As the population climbed to its new peak of 225 animals, rates of aggression increased among males and normally peaceful females, the variety of social systems changed as territorial harems gave way to harems that had large overlapping ranges, and many harems became populated by more than one male. Although those changes helped to mediate some of the consequences of crowding while the population was in transition, in the end a new carrying capacity was reached and was accompanied by changes in behavior and vital rates. One of the biggest changes was a reduction in the stability of the harem. Pressure from increasing numbers of bachelor and harem males lowered female feeding rates, increased the percentage of females that changed groups each year from just under 11 percent to just over 25 percent, and increased the skew in reproductive success (a nonequitable distribution of reproduction among individuals) of males and females. Once NPS started managing the population to cycle around 125, average body condition and vital rates improved and the reproductive skew of both sexes was reduced, and this improved the genetic health of the population (Rubenstein and Nuñez, 2009).

Horses on Shackleford Banks decreased the abundance of *Spartina* grasses (Wood et al., 1987; Hay and Wells, 1991). Grazed habitats had less vegetation, a higher diversity of foraging birds, higher densities of crabs, and lower species richness of fishes (Levin et al., 2002). Horses altered habitats indirectly in many ways.

Oostvaardersplassen, the Netherlands

In the Oostvaardersplassen Reserve in the Netherlands, Heck cattle, red deer, and Konik horses have been left unmanaged since the 1980s and have reached high densities (Vulink, 2001). It is a relatively moist ecosystem, having been reclaimed from the sea and having high annual precipitation. The management objective is to allow natural processes to operate to the greatest extent possible although the reserve is fenced. The management is informed by an appreciation of the natural, expected, and even desirable effects of large herbivores on other components of the ecosystem and the possibility of natural regulation through density dependence. Herbivores were originally introduced to keep the vegetation in a more open state because there was considerable woody encroachment. The herbivore species are close analogues of the native herbivores that would have been present hundreds of years ago. Large predators are absent. The Konik horses have shown a higher intrinsic rate of population increase than Heck cattle (Vulink, 2001) and have outnumbered the cattle, which apparently are regulated by food shortage in winter. If current trends continue, the horses and red deer will probably outcompete the cattle and displace them (ICMO2, 2010).

Because the reserve is small and most of it is easily visible to the public, animals that die of starvation or old age can be seen, and this leads to dilemmas with respect to the ethical treatment of animals (ICMO, 2006; ICMO2, 2010). Large dieoffs during severe winters are periodic. On ethical grounds, animals that are suffering and dying are culled (shot) to prevent further suffering. That is also justified as a replacement for predators and as a moral responsibility of humans because of the creation of artificial barriers to movements out of the reserve (fences).

The following responses have been observed:

- The number of animals culled in response to weather conditions is highly variable.
- The number of animals culled has increased over the last decade because populations have reached ecological (food-limited) carrying capacity.

- The average body condition of animals has declined over the last decade.
- Mortality has increased with annual variability in mortality. Mortality is expected to balance recruitment in the near future.
- Plant productivity and the number of animals that the area can support will possibly decline somewhat because of depletion of soil nutrients.
- Grazing promotes short swards and prevents woody regeneration.
- Grazing increases plant diversity on the small scale but not the large scale. (ICMO2, 2010)

Pryor Mountain Wild Horse Range

A population of horses descended from Andalusian Spanish mustangs has inhabited the Pryor Mountains possibly since the 1700s (BLM, 1984). The earliest record of their presence is a photograph of a roundup of 101 horses in 1910. Although the horses have inhabited the Pryor Mountains since then, they were never counted until 1970. Horse traps were built by ranchers in the 1930s and 1940s, but the numbers removed were never recorded. When BLM announced plans to remove the horses in 1964, they appeared to be in good shape despite the condition of the range. Local ranchers commented that the range was not overgrazed, that horse birth rates were low, and that the horses were in no worse condition than they were 50 years before (Ryden, 1990). Notably, considerable numbers of domestic livestock were permitted to use the range from 1907 to 1930. Half as many livestock units were permitted after 1930. In 1970, when a census of the horses occurred, there were 270 horses (Feist and McCullough, 1975). Horse reductions began with roundups in 1971 and 1973 and reduced the herd to 120-130. The horses have since been managed through removals to about 85-120. Most recently, the U.S. Department of Agriculture's Natural Resources Conservation Service carried out an assessment (Ricketts et al., 2004), which recommended an AML of 45-142 and noted the following:

- Over the last half-century, the conditions of the horse range were described as very poor to fair in a number of BLM assessments.
- The condition of the range is getting worse on the basis of low proportions of preferred plant species and evidence of soil erosion.
- In 2004, the health of the rangeland at six sites was rated at 2.0-3.75 (average, 2.75) on a scale of 0-5. A score of 4 or more is considered healthy relative to the historical potential climax vegetation. A score of 2.5 or less is considered unhealthy and to have a strong possibility of nonrecovery in the absence of external energy inputs (such as mechanical seeding). (Ricketts et al., 2004)

Apparently, although horses have been managed since 1973 at much lower numbers than were present initially and despite reductions in livestock numbers in the 1930s, unhealthy range conditions have persisted. However, Singer et al. (2000) noted that former managers who visited the range in 1997 remarked on an overall improvement in plant condition.

In an ecosystem modeling assessment (see Chapter 7) of the Pryor Mountain Wild Horse Range, it was possible to examine vegetation and animal responses to various horse densities, including the number present in 1970 (Coughenour, 1999, 2000, 2002). It was also possible to determine food-limited carrying capacity by letting the model run with no horse removals until it came into quasiequilibrium with vegetation productivity. With horse numbers held constant at 270, the model simulated markedly reduced herbaceous biomass compared with what happened with no horses. Forb biomass proportion increased while

grass proportion decreased. Root biomass was also decreased. In the simulation in which horse populations were allowed to grow freely, plant responses were not much different from those with the number fixed at 270.

Grazing was predicted to be heterogeneously distributed. When 1971-1996 observed horse numbers (87-250 horses; mean, 157) were used, 40-70 percent of the landscape was predicted to be lightly grazed, 5-20 percent grazed less than 80 percent, and 5-15 percent grazed to 50- to 80-percent offtake. The model predicted that with historical horse densities, some parts of the landscape would experience substantial decreases in herbaceous biomass. With no culling, the fraction of the landscape that would be heavily grazed would increase markedly. The model simulated that horse numbers would initially increase to over 300, level off, plunge dramatically in response to a drought, and then gradually increase and level off at a mean of 270, the food-limited carrying capacity. In both the fixed number and the freely varying simulations, horse body condition declined to low levels, particularly in dry years or years with severe winters. In separate simulations comparing horse body conditions with no culling versus actual densities in 1970-1995, horse body condition was markedly lower with no culling. At food-limited carrying capacity, plant cover would be lower than what exists on the range, and the fraction of the landscape receiving extremely heavy use would increase (see Chapter 7). In the heavily used areas, herbaceous cover would be reduced to less than 20 percent of potential, and soil erosion rates in those areas would probably also be higher. Horses would be in poorer body condition, and horse mortality would be higher.

MANAGEMENT FACTORS

Management itself alters horse and burro population growth rates through a variety of mechanisms aside from the simple direct effects of removals or reduced fertility due to contraception. The indirect effects of management are considerable. One likely response is compensatory population growth as a result of reductions in numbers. Horse and burro populations are seldom limited by density because they are kept below food-limited carrying capacity through removals and to some extent through treatment with the contraceptive porcine zona pellucida (PZP; discussed in Chapter 4). Indeed, AMLs are usually set in such a way that considerable forage material is uneaten; this is the very purpose of the allowable use level (see Chapter 7). That leaves horses and burros in a position for compensatory population growth because they are below food-limited carrying capacity. If there were no intervention, herds would reach food-limited carrying capacity, body condition would decline, natality and survival rates would decline, and more animals would die of starvation. Removals are likely to keep the population at a size that maximizes population growth rate (see Figure 3-2B), which in turn maximizes the number of animals that must be removed and processed through holding facilities. Management may also alter population growth by affecting dispersal, particularly through fencing but also by permitting conflicting land uses that alter habitats for horses and burros. Impaired dispersal would decrease population growth because of increased competition for forage. Water provision, in contrast, could increase population growth rate by increasing the area of habitat that has water and thus total available forage. Horses in arid Australia were reported to range as far as 50 km from water (Berman, 1991), but maximum distances would probably be considerably less in rugged topography or where there are other impediments to movement.

Compensatory Reproduction

Compensatory reproduction in response to gathers is likely in any population that exhibits density dependence. To the extent that a population is being regulated by food supply, decreased density will provide more forage per individual, increasing body condition, reproduction, and survival and thus population growth rate. Choquenot (1991), in a study of feral donkeys in Australia, reported that population growth was regulated by food-related juvenile mortality. Dawson and Hone (2012) advised that compensatory responses in survival, fecundity, and age at first reproduction in the population should be considered in any management program. In particular, they were referring to the fact that their data showed that survival and fecundity were increased and age at first reproduction decreased at lower densities, so it is likely that reductions in density due to culling will have the same effect.

The response of population growth rate to increased density must be known in order to predict the degree of compensatory growth that can be expected at a given population density. If the population size is above the theoretical inflection point of the logistic growth trajectory (point α in Figure 3-2A), reductions will increase the annual population growth increment. However, if the population size is below the theoretical inflection point, reductions will decrease the annual growth increment. Various models of density dependence, as discussed above, could be used to predict the degree of compensatory growth resulting from animal removals in relation to the population size and the rate of removal.

Gathering has also been shown to have varied indirect effects on reproductive success. In Idaho and Wyoming, foaling success rates were higher among gathered horses than among horses that were not gathered (Hansen and Mosley, 2000). Foaling success rates in Idaho were 29 percent, 31 percent, and 43 percent for mares not gathered, mares gathered and adopted, and mares gathered but released, respectively. In Wyoming, foaling success rates were 29 percent, 42 percent, and 48 percent in those groups. There were no statistically significant differences among groups, however, most likely because samples were small in relation to high variance. Effects of gathers on body condition, lactation status, and pregnancy were not reported. It is important to note that such results, if real, would most likely be attributable to forage limitation and lower body condition among ungathered than among gathered mares. In contrast, in another study, foaling was lower among gathered horses. Pregnant mares that were gathered and removed had substantially lower reproductive success than ungathered mares at one site, and gathered and released mares had less reproductive success than ungathered mares at a second site (Ashley and Holcombe, 2001). The authors speculated that that was a result of loss of fetuses due to the stress of being gathered and handled for a long period. Animals that were removed were transported 246 km to a holding facility, where they were held for 21 days before adoption. A number of miscarriages were observed at the holding facility.

Kirkpatrick and Turner (1991) compared a population managed with annual foal removals on Chincoteague Island, Virginia, with an unmanaged population on Assateague Island, Maryland. Management-level applications of PZP did not begin on Assateague Island until 1994, after the 1989 study (Turner and Kirkpatrick, 2002.) They hypothesized that there would be greater fetal losses in the unmanaged population because of the concurrent physiological stresses of lactation and pregnancy (weaning rarely occurs before 1 year and it commonly occurs at 2 years). They estimated pregnancy and foaling rates of 40 free-ranging mares on Assateague Island and 48 managed mares on Chincoteague Island and found a higher foaling rate in the Chincoteague population because a greater percentage of mares foaled annually (80 percent). The hypothesis of greater fetal loss was not supported: there

was no difference between the two populations. However, pregnancy and foaling rates in the Chincoteague population were nearly double those in the Assateague population. The authors suggested that the greater pregnancy and foaling rates were due to cessation of lactational anestrus and that the cessation of lactation in mares that had their foals removed resulted in these animals going back into estrus. However, the authors provided no evidence that lactating mares were not cycling. Another possible cause of increased pregnancy and foaling in the managed population is reduced energetic demands due to cessation of lactation. In contrast, Wolfe et al. (1989) used plasma progesterone measurement to examine pregnancy rates in 553 free-ranging mares. They found no difference in pregnancy rate between lactating and nonlactating mares. Kirkpatrick and Turner (1991) suggested that the reason that no difference was found was that the method for detecting pregnancy—measurement of plasma progesterone—can be inaccurate. Although the method is widely used for detecting pregnancy in other species, it is not reliable for equids. It is also known that although lactational anestrus does occur, it is very uncommon, and most mares resume cycling 5–9 days after foaling. In summary, it is possible that population management via foal removals may result in increased fecundity, but evidence of a lactational anestrus mechanism is lacking. It is also possible that pregnancy and foaling rates are reduced in lactating mares because of the lower body condition that results from the energetic demands of lactation. Because horse populations on BLM lands are not managed through foal removals, this form of compensatory reproduction probably has little relevance.

The effects of PZP on population growth, longevity, and body condition were studied over a 10-year period on Assateague Island (Turner and Kirkpatrick, 2002). PZP clearly reduced foaling rates among contracepted animals. However, mortality in mares and foals decreased, and two older age classes appeared (21–25 years and over 25 years), which indicated an increase in longevity. Body-condition scores of nonlactating mares increased substantially but those of lactating mares did not change. The cause of the decrease in foal mortality was unclear, but it could have been due to increased body condition of the mares. Body condition of untreated mares, or of treated mares in which the treatment has lost effectiveness, could increase because of reduced competition for forage. In treated mares, contraception reduces the energetic costs of reproduction, and this also results in increased body condition and longer life span (Gray and Cameron, 2010). Nuñez et al. (2010) also found that treated mares had better body condition than untreated mares; this could result in an extended breeding season and increased chance of conception in animals that have low PZP antibody levels. Thus, the favorable effects of increases in body condition, longevity, foal survival, and length of breeding season on population growth rate could offset to some extent the adverse effects of contraception on reproduction and population growth rate. That might be termed compensatory population growth; however, it is unlikely that the degree of compensation would be sufficient to overcome the degree to which contraception reduces reproduction and population growth.

Effects Related to Ability of Animals to Disperse

Ecologically adaptive movement patterns are still exhibited by many extant horse populations. Free-ranging horses in Nevada move from low to high altitudes in spring or early summer after the wave of vegetation green-up, and they move to low elevations in fall (Berger, 1986). However, changes in land ownership and allocations of lands for livestock use may interfere with traditional movement patterns and may preclude the re-establishment of natural movements, ones that presumably exist in truly wild and free-ranging equid populations.

The importance of movement for coping with drought is illustrated by observations in Namibia (Gasaway et al., 1996). Ungulates, including zebra, maintained near average mortality during severe drought because they could move over large areas and find food reserves in areas not regularly grazed. Low ungulate densities and clumped distributions were responsible for the existence of infrequently used areas that served as drought reserves. Such dry-season food reserves were also important in keeping mortality low in Kruger National Park during a drought in 1982-1983 (Walker et al., 1987). In contrast, populations in two other reserves, which were near their food-limited carrying capacity before the drought, lacked such lightly grazed food reserves and suffered high mortality (Walker et al., 1987, as noted by Gasaway et al., 1996).

An important question is the extent to which horse (and cattle) grazing can be managed to compensate for losses in natural movement patterns, which presumably were important determinants of the grazing regimes experienced by plant species that evolved during or before the Pleistocene in the presence of large herbivores. The mix of private, tribal, and public ownership often fragments landscapes that might have been more natural, expansive grazing areas. Differences between agency policies may exacerbate the fragmentation. Fencing can interfere with movement to other areas when forage is depleted and cause heavier intensities and frequencies of herbivory than would occur otherwise.

Confinement or restrictions on migration or dispersal movements will probably result in a plant-herbivore system that has different dynamics from one that does not have such constraints. In general, the smaller the area that a population is limited to, the greater the potential for a self-regulating system with undesirable qualities, such as population crashes and population oscillations. Spatial constraints can lead to reductions in vegetation cover to lower levels than would be seen otherwise, followed perhaps by vegetation recovery after horse populations decline in response to food shortages. However, there is also an increased likelihood of irreversible shifts in vegetation communities, in accordance with recent theory and observations of alternate stable states, to communities dominated by invasive plant species, by shrubs, or by bare ground with little or no seed bank to support recovery (see the section "Understanding Ecosystem Dynamics" in Chapter 7).

In contrast, such generalizations as "confinement will result in range degradation" are also unwarranted. The degree of confinement, the areas that are inaccessible, the availability and dispersion of water, climate, and vegetation productive potential can all modify the response. Confinement may have little or no consequences or great consequences, depending on those factors.

Additional challenges arise from migration and dispersal across HMA boundaries. A designated HMA may constitute the core range of a herd or population, but dispersal movements outside the HMA are possible. Dispersing animals may move onto areas that are subject to conflicting land uses or management objectives. Conversely, movements of animals into an HMA from surrounding areas that are under different management jurisdictions can work at cross purposes to the management objectives of an HMA. Where such cross-jurisdictional movements occur, it is necessary to establish co-operative relationships among adjacent landowners.

CONCLUSIONS

Large herbivore populations are influenced by density dependence, density-independent factors, and predation. Most large herbivore populations show some degree of density-dependent limitation, particularly when predation is low. Likewise, many wild equid populations exhibit density dependence. Density dependence has operated in some

free-ranging horse and burro populations in the western United States and elsewhere. The primary way that populations self-regulate or self-limit is through increased competition for forage at higher densities, which results in smaller quantities of forage per animal, poorer body condition, and decreased natality and survival rates. Behavioral mechanisms can also contribute to density dependence, particularly increased dispersal, and increased agonistic interactions and decreased band stability may interfere with foraging and reproductive success.

Clearly, it is possible to incorporate density dependence into models as a population process. Although it has been omitted from some models because populations were believed to be held below food-limited carrying capacity by management or other factors, it was found necessary to include in others when it was an important component of population dynamics, particularly in wild, unmanaged populations of equids. There are basically two approaches to modeling density dependence. One is through the inclusion of a direct effect of density, often in relation to an assumed or derived food-limited carrying capacity (K), which must be empirically determined for the system in question. Although total forage biomass may be estimated through vegetation sampling (see Chapter 7), there is still a need to demonstrate how population variables respond to diminished forage biomass; thus, there is a need for empirical studies. The other approach is through mechanistic modeling of competition for limited forage at higher densities and its effects on survival and reproduction. The first approach is more site-specific, but in either case, there is a need to assign values to parameters based on data from case studies of populations that are allowed to reach levels at which density dependence takes effect. However, there are few such case studies. The committee suggests that existing situations of self-limited populations be studied or that an experiment be conducted to enhance understanding of such systems.

Density-independent variation is also an important consideration. Most equids under BLM purview inhabit arid and semiarid environments characterized by high variability in annual precipitation and thus forage. In some environments, variable snow cover is also an issue. When climatic variation is high, plant-herbivore systems become increasingly disequilibriumal. In such environments, density dependence may be relatively weak, and population dynamics may be driven largely by density independence, with resulting large variability in survival and recruitment. Populations may also be driven below any theoretical food-limited carrying capacity that is based on mean forage biomass.

Predation can be important in controlling the sizes of some populations of wild equids, but the degree of control is highly variable. In intact equid ecosystems in Africa, zebra populations are probably limited to some extent by predators, but climatically influenced variations are strong in comparison, so it is difficult to establish the effect of predation quantitatively. In some North American free-ranging horse populations, there clearly is predation by mountain lions. However, the degree of limitation has not been established. More problematic is the fact that mountain lion ranges are not widespread throughout the principal habitats of the horses under BLM purview. The limitation of the range is not necessarily due to human hunting or extirpation, inasmuch as these habitats may simply be poor habitats for mountain lions. Mountain lions are ambush predators, requiring habitats with broken topography and tree cover, whereas horses tend to use areas that have extensive viewsheds. Wolves are cursorial and capable of chasing prey across open, flat topography. They have a great impact on a few populations on other continents and certain areas in Canada, but their distribution in the western United States has been severely reduced by humans, and very few, if any, free-ranging horse habitats are occupied by wolves.

Several case studies have demonstrated the potential outcomes of a self-limited equid population. Equids invariably have some effect on vegetation abundance and composition

(see Chapter 7). Vegetation cover is usually reduced, and often there are shifts in species composition. There is limited evidence that erosion rates are increased. However, none of the case studies included scientific experimentation that showed that the changed vegetation cannot persist over a long period of time or that complete loss of vegetation cover is inevitable. Case studies have also reported increased competition with other wildlife species and adverse effects on habitats of some species. In some cases, vegetation changes were probably due in part to historical livestock grazing. In other cases, horse population reductions were not shown to reverse vegetation changes.

The results of the case studies are consistent with theoretical predictions that when a herbivore population is introduced, vegetation cover will initially change and productivity will often be reduced by herbivory. In some environments, however, moderate levels of herbivory have little effect or even beneficial effects on plant production (see Chapter 7). Vegetation production may decline, but it may stabilize at a lower level as herbivore populations come into quasiequilibrium with the altered vegetation cover. The reduction in plant cover may be great enough to cause accelerated soil erosion, an important indicator of reduced rangeland health. If erosion reduces soil water-holding capacity and soil fertility, the productive capacity of the vegetation and of the forage base will decline and the resulting feedback effects on equid population growth might reduce grazing pressure and further erosion. Whether unmanaged, quasiequilibrium soil-plant-equid ecosystems can persist over a long term on rangelands administered by BLM is unknown, but there are pertinent examples of unmanaged equids in Africa that have persisted for millennia, in some cases despite weak or no evidence of predator limitation. Feedbacks from the plant-soil system to equid population growth must have enough functionality for long-term ecosystem persistence. Such feedbacks may be disrupted by various human activities. Thus, there is a need to be able to predict equid population responses to decreased forage productivity concurrently with vegetation productivity declines in response to erosion in landscape ecosystems that are affected by human activities, such as habitat fragmentation.

The literature clearly demonstrates that density dependence due to food limitation will reduce population growth rates in equids and other large herbivores through reduced fecundity and survival. The total annual population increment will decline at higher densities (Figure 3-2A). Some of the reduction in annual population increment at high densities will probably be due to reduced fertility, and much of the reduction can also be expected to be due to increased mortality. The literature and the case studies show that although density dependence can regulate population sizes, responses will probably include increased numbers of animals in poor body condition and high numbers of animals dying from starvation. Those may be unacceptable outcomes for some stakeholders, particularly those who perceive that they result from human interference with natural processes of dispersal, access to key forage resources, or predation. If so, it could be argued that humans are potentially responsible for the starvation and mortality.

The committee was charged with addressing the question of compensatory reproduction in response to population controls. As discussed above, it is quite likely that there would be compensatory increases in recruitment and decreases in mortality in response to lower animal numbers, whether because of removals or contraception, because of decreased competition for forage, and or because of improved body condition. Mares in better body condition can be expected to have higher fertility rates, and foal survival can also be higher. An increased foaling rate has been observed in one population that was managed through foal removals, but the likelihood of observing that response generally is questionable, and, because horse populations on BLM lands are not managed by foal removals, this possibility is irrelevant in any event. Finally, there is no evidence that contraception

stimulates reproduction through physiological mechanisms. On the contrary, the purpose of contraception is to decrease fertility.

A managerially important finding was that free-ranging horse populations are often limited by removals to levels below food-limited carrying capacity, so population growth rate could be increased by the removals through compensatory population growth related to decreased competition for forage. Thus, the number of animals that must be processed through holding facilities is probably increased by management.

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4

Methods and Effects of Fertility Management

This chapter reviews and assesses current options for controlling fertility of free-ranging horses and burros. Investigation of potential fertility-control options was one of the mandates of the previous National Research Council studies. In the late 1970s and early 1980s, the Committee on Wild and Free-Roaming Horses and Burros reviewed the status of contraception, including sterilization, for population control in free-ranging herds. That committee reported on the feasibility of several techniques, including hormone injections for stallions and hormone treatments, intrauterine devices (IUDs), and surgery for mares. It concluded that endocrine contraception in stallions or mares was the most promising approach because IUDs often dislodged and surgery was impractical in field conditions (NRC, 1980). The 1980 report noted that studies of endocrine contraception in stallions were going on at the time and recommended a study of contraception in mares. In 1991, the Committee on Wild Horse and Burro Research reviewed the proposal for and later the results of a study that examined steroid implants in mares captured from the range and held in pens, steroid implants in free-ranging mares, and vasectomies of free-ranging dominant stallions. That committee found some steroid treatments to be effective in mares. Vasectomies were effective in sterilizing individual animals, but the committee questioned the technique's effectiveness at a population level, given that only dominant stallions were treated (NRC, 1991).

Research on effective methods of fertility control remains important to the Bureau of Land Management (BLM) because fertility control is the major alternative to gathering and removing horses that is generally accepted by the public. In the 20 years since the last National Research Council report was completed, considerable progress has been made in developing and testing fertility control for wild animal populations, both free-ranging and captive. Research with captive animals has been especially valuable in allowing more extensive and careful monitoring and analysis of efficacy and safety of a wide array of products. In particular, pathological conditions associated with some types of contraceptive treatment have been detected and are under systematic investigation, which is difficult to accomplish in free-ranging populations.

Although the committee's report includes information on burros as well as horses, the need for fertility control in horses is considered more pressing because their populations are much larger (BLM, 2003, revised 2005). In addition, many more studies have focused on horses, so considerably more data are available on them than on burros. Nevertheless, given similarities in reproductive physiology, the efficacy and safety of methods could be expected to be generally similar in the two species. Their social structures differ, however, as described in the following sections, and this could influence the effects of fertility-control methods on behavior and social organization.

Reversible contraception and permanent sterilization are achieved by interrupting reproductive processes, and the committee's evaluation of these methods is based in part on understanding their effects on an animal's reproductive physiology and behavior. Accordingly, this chapter starts with two reviews: one on equine social and mating behavior, social relationships, and social structure and a second on reproductive physiology in domestic horses and donkeys, with information on free-ranging horses and burros when available. The brief reviews are intended to serve as background for understanding the potential effects of fertility-control methods on behavior and reproductive processes. The chapter then evaluates available fertility-control treatments for both females and males and summarizes the advantages and disadvantages of the most promising methods.

EQUINE SOCIAL BEHAVIOR AND SOCIAL STRUCTURE

Horses, zebras, and asses (the primogenitors of donkeys and burros) are highly social animals, but their social structures vary. Klingel (1975) was the first to document that equids exhibit two types of social organization. In one, typified by horses and plains and mountain zebras, females and their young live in closed membership groups with one, and occasionally a second, male. In those so-called harem groups, females benefit by receiving material rewards from their males (Rubenstein, 1986). Enhanced male vigilance against potential intruder males not only reduces a male's chances of being cuckolded but reduces harassment experienced by females. Consequently, females can devote more time to feeding and increase the likelihood that their offspring will survive to independence (Rubenstein, 1986). That type of society emerges under more mesic environmental conditions in which food is relatively abundant and distributed near predictable watering points.

In more arid areas, where abundant food is far from water, the second type of society appears, as typified by Grevy's zebras and the wild asses, including the African wild ass that is the ancestor of the donkey. Arid and semiarid conditions make it difficult for females, whether with or without young foals, to remain together in closed-membership groups, meet their different physiological needs, and benefit from the extra foraging time that heightened male vigilance provides. Nonlactating females and mares that have older foals need drink only every 3-5 days (Ginsberg, 1989; Becker and Ginsberg, 1990), whereas ones that have foals 3 months old and younger must drink daily. The latter females stay near water whereas the others wander more widely in search of better pasture. Because both types of females are fertile and males cannot be with both simultaneously, males establish territories. The most dominant hold areas near water, where they have exclusive access to females that have young foals and intercept those coming to water every few days. Aridity thus alters the nature of relationships among both females and males and leads to a more fluid, fission-fusion type of social system (Rubenstein, 1994).

Although the two social systems emerge from differences in individual social relationships and environmental conditions, they share some important characteristics. First, the mother-infant bond is strong in all equids. Second, sons and daughters leave their mothers

when they reach sexual maturity; males join bachelor groups, and females are immediately integrated into adult society. Third, the female reproductive state influences female nutritional needs; meeting these needs sometimes permits long-term stable bonds to form but sometimes does not. Much depends on long-term evolutionary responses to ecological circumstances that lead to the emergence of different social systems. In free-ranging horses, the norm is a stable society in which females can meet their needs while benefiting from limited interruptions. In free-ranging burros, fluidity of social relationships is the norm in that close bonds among females and between males and females are precluded by the disjunctive nature of high-quality feeding and drinking locations.

REPRODUCTION IN DOMESTIC HORSES AND DONKEYS

This section provides an overview of the various points in the reproductive processes of male and female horses and burros that can be targeted for fertility control (see Asa, 2010, and Asa and Porton, 2010, for further details).

Sexual maturity in free-ranging male and female horses occurs at the age of about 18 months, but onset of reproduction is dependent on social parameters within the population. First reproduction for males is typically delayed for up to several years while they reach social maturity. Sexual maturity in domestic donkeys and free-ranging burros is reported to occur at the age of 1-2 years in females (Fielding, 1988; Pugh, 2002) and 1.5 years in males (Nipken and Wrobel, 1997). The earliest possible age of puberty in males and females of both species is 1 year, so preventing reproduction in those animals would require that treatment begin before that age.

Both species have seasonal breeding patterns, but seasonality is less pronounced in domestic donkeys and free-ranging burros (Ginther et al., 1987). Seasonal reproduction is controlled primarily by photoperiod, but temperature and body condition can also influence reproductive timing (Sharp and Ginther, 1975; Guillaume et al., 2002). Thus, local conditions can affect the length of the breeding season, especially for female horses. Male domestic horses can produce sperm year round, but the quality declines during winter, the mares' nonbreeding season (Pickett et al., 1975).

Most female free-ranging horses give birth in the spring, and this is followed within 5-12 days by postpartum estrus (foal heat), when conception is again possible. Female domestic donkeys also show postpartum estrus (Pugh, 2002). Nonpregnant female domestic donkeys also begin to have reproductive cycles in the spring, and domestic horses and donkeys both continue cycling until conception or the end of the breeding season.

For horses and donkeys, as for many other mammals, the ovarian or estrous cycle is divided into phases. During the follicular or estrous phase (when females will stand for mating), follicle growth is stimulated by gonadotropin-releasing hormone (GnRH) from the hypothalamus and follicle-stimulating hormone (FSH) and luteinizing hormone (LH) from the pituitary. The follicles produce estradiol, which stimulates estrous behavior. The estrous phase in donkeys and horses reportedly lasts about 6-9 days (Ginther, 1979; Vandeplassche et al., 1981).

During estrus, the female is attractive to males and receptive to mating. Courtship behaviors are generally similar in horses and donkeys with some important exceptions. Estrous horses often raise their tails, exposing the genital area, as they approach and follow males (Asa, 1986). Tail raise is not as obvious in female donkeys, but they spend more time in proximity to males and respond to male vocalization by approaching (Henry et al., 1991). Courtship interactions tend to be more vigorous in donkeys and include more elements of aggression, such as kicking and chasing. Female horses urinate more frequently

during estrus, and males assess urine via the flehmen response, which introduces pheromones into the vomeronasal organ for neural processing of the female's reproductive status (Stahlbaum and Houpt, 1989). Vocalization appears to be more important in donkeys, males of which commonly initiate sexual interactions by vocalizing (Henry et al., 1991).

Ovulation occurs toward the end of the estrous phase, but courtship and mating may continue for an additional couple of days in both horses and donkeys. An LH surge triggers ovulation, which is followed by conversion of the follicles to corpora lutea (CL), which produce progesterone. Progesterone domination during the luteal phase, also called diestrus, inhibits further estrous behavior. The total cycle in horses lasts about 3 weeks but in donkeys may last as long as 28 days (Ginther, 1979; Vandeplassche et al., 1981; Fielding, 1988). Estradiol and progesterone prepare the uterus for implantation and nourishing the embryo.

Fertility rates in domestic horses are reported to range from about 80 to 100 percent per breeding season, depending on factors such as breed, age, and reproductive history (reviewed in Ginther, 1979). Fertility rates are lower in older and very young mares (Carnevale and Ginther, 1992; Vanderwall et al., 1993). Rates are also lower in domestic mares that have not previously foaled than in currently lactating mares (reviewed in Ginther, 1979). In one study of pasture breeding of domestic donkeys, all 14 females that were examined were pregnant (Henry et al., 1991).

Gestation length is 11 months in horses and 12-12.5 months in domestic donkeys (Ginther, 1979; Fielding, 1988). However, possible ovulation or spontaneous luteinization, resulting in the formation of secondary CL, around day 40 can confound calculation of gestation length in field studies. Estradiol secreted by the follicles that precede CL formation can stimulate estrous behavior in a small percentage of pregnant females (Tomasgard and Benjaminsen, 1975) and give the appearance of a natural estrous cycle.

With a gestation length of about a year, horses and donkeys can give birth every year. However, that may not occur, especially in nutritionally stressed females. In particular, nursing females, experiencing the energetic drain of lactation in addition to maintenance, may not succeed in sustaining a pregnancy. But lactation itself does not prevent estrous cycles, so conception may occur, although the embryo may be lost if the female is nutritionally stressed. Early embryo loss (defined as up to day 40 of pregnancy) is reported to be 5-15 percent even in well-fed domestic mares but can be 30 percent or higher in mares that are 18 years old or older (Vanderwall, 2008). Pregnancy loss may also be high in yearling mares (Mitchell and Allen, 1975). In a small study of domestic donkeys, three of 14 pregnant females experienced early embryo loss (Henry et al., 1991).

POTENTIAL METHODS OF FERTILITY CONTROL IN FREE-RANGING HORSES AND BURROS

First, it is important to note that, when the committee prepared its report, no fertility-control methods that were highly effective, easily delivered, and affordable were available for use across all BLM Herd Management Areas (HMAs). In addition, there were no fertility-control methods that did not alter the behavior or physiology of free-ranging horses and burros in some way. Any method that prevents reproduction can do so only by affecting some aspect of the reproductive system. Even if the only effect were to prevent births, that would change the age structure of a herd by reducing the number of young and could enhance the health of females by reducing the caloric demands of reproduction. Thus, in evaluating fertility-control methods, it is important to compare them not only for obvious factors—such as efficacy, mode of delivery, and cost—but for the constellation of

their effects on physiology, behavior, and social structure. It is also critical to extend the comparisons to the social-structure changes and behavioral and health effects that are caused by gathers.

The porcine zona pellucida (PZP) vaccine, an immunocontraceptive, is the most extensively tested method in free-ranging horses and may be the most promising option at present. Several other methods that are potentially useful in horse and burro populations will be considered in this chapter, but more research may be required before their application can be recommended. Fertility-control methods range from other types of vaccines to hormone agonists;¹ some methods are more appropriate for treatment of females, and others could be used to control male fertility. Some of the methods are reversible—and allow the possibility of future restoration of fertility—but others are permanent sterilants that have the economic and logistical advantage of making repeated treatment unnecessary. In particular, nonsurgical approaches to sterilization will be evaluated.

Methods that are not considered permanent may not be 100-percent reversible in all animals. Even if a contraceptive, such as an implant, is removed or its effect wears off (in the case of an injectable contraceptive), other factors may slow or even prevent complete restoration of fertility. Many factors affect fertility and time to conception or birth even in females that have never been treated with contraceptives (reviewed in Asa, 2005). Female age is the most obvious factor, but parity (the number of times that a female has given birth), age at production of first offspring, time elapsed since last pregnancy, nutritional status, health, genetics, and other more subtle factors can also influence a female's ability to conceive and maintain a pregnancy to term. Fertility of previously contracepted females can be affected by those factors and by lingering effects of the contraceptive itself. Individual differences are common.

The process of selecting the best method for the species and situation includes an evaluation of many equally important factors, such as delivery route, efficacy, duration of effect or reversibility, physiological side effects, and possible effects on behavior and social structure. It is also important to know whether a method is safe for prepubertal animals and whether females can be treated during pregnancy or lactation. Although methods can be male- or female-directed, more research in control of fertility in free-ranging equids has targeted females, specifically different formulations of the PZP vaccine, than males. The following review includes methods for both males and females and methods that have been tested with other species that could be considered for use in free-ranging equids.

ADJUSTMENT OF SEX RATIO TO LIMIT REPRODUCTIVE RATES

Adjustment of the sex ratio to favor males has been proposed for managing population growth rates of horse and burro populations. Sex ratio typically is somewhat adjusted after a gather in such a way that 60 percent of the horses returned to the range are male. At that ratio, however, population growth would be only slightly reduced: modeling by Bartholow (2004) suggests that birth rates could decline from about 20 percent to 15 percent a year if the proportion of males increased from 0.50 to 0.57. If more aggressive sex-ratio adjustments are initiated by drastically altering the number of females relative to males beyond a 40:60 ratio, care should be taken to assess possible additional consequences. In the Pryor Mountain Wild Horse Range, Singer and Schoeneker (2000) found that increases in the number of males on this HMA lowered the breeding male age but did not alter the birth rate. Because the existing females were distributed among many more small harems,

¹A hormone agonist binds to a receptor of a cell and has the same action as the native hormone.

estimates of genetic effective population size increased.² In addition, bachelor males will likely continue to seek matings, thus increasing the overall level of male-male aggression (Rubenstein, 1986). Male condition may decline because of the increase in time spent in competing, and the disruption caused by male-male competition may affect female foraging success. Both those outcomes might reduce overall population growth more than would a reduction in the number of breeding females. Because horses and burros have polygynous mating systems (multiple females mate with one male), additional males would not be expected to affect the likelihood of reproduction in individual females. Reduction in reproductive rate would depend on the number of females remaining. Having a larger number of males competing could favor females by enhancing the opportunities for mate choice, could mean that males of higher genetic quality would achieve harem stallion status, or both. Given that the addition of males or the subtraction of females can lead to a similar sex ratio but have different effects on population growth rates, forecasting models tuned with population-specific survival and fecundity levels can be used to determine how to adjust sex ratios to limit population growth in individual populations effectively.

FEMALE-DIRECTED METHODS OF FERTILITY CONTROL

Potential methods of fertility control directed at female equids include surgical ovariectomy (removal of the ovaries); immunocontraceptives, which trigger the animal's immune system to prevent pregnancy; GnRH agonists; steroid hormones; and intrauterine devices. The mode of action and effects of each method are reviewed below.

Surgical Ovariectomy

Surgical ovariectomy and ovariectomy are commonly used in domestic species, such as cats and dogs (including feral cats and dogs), but seldom applied to other free-ranging species. Accessing the female reproductive tract, which lies within the body cavity, in contrast with the reproductive tract of males of most species, which have external testes, carries the risk of dehiscence of sutures or infection. However, an alternative vaginal approach, colpotomy, avoids an external incision and reduces the chances of surgical complications or infection (Rodgers and Loesch, 2011). The mare is sedated and tranquilized while standing but restrained; a local anesthetic is sometimes used as well to reduce movement during surgery. An incision is made through the wall of the vagina and then through the peritoneum to access the ovaries. Although the risks are lower than with transabdominal surgery, episiotomy (suturing to close the vulva) and stall restriction for 2-7 days are recommended to reduce the chance of evisceration. Monitoring for 24-48 hours for signs of hypovolemic shock due to internal bleeding is also recommended. The procedure is not without risk.

Duration and Efficacy

Removal of the ovaries is of course permanent and 100-percent effective. Ovariectomy during the first 2-3 months of pregnancy results in abortion because of the loss of progesterone

²Effective population size is the size of an idealized population that would experience the same magnitude of random genetic drift as the population of interest. Populations that have experienced fluctuating sizes between generations, unequal sex ratios, or high variance in reproductive success are likely to have effective population sizes that are lower than the number of animals present. The concept of effective population size is discussed in Chapter 5.

from the corpus luteum (Holtan et al., 1979). Ovariectomy during the period of lactation would not be expected to affect milk production, inasmuch as gonadal hormones (estrogen and progesterone) are important during late pregnancy when mammary glands are developing but not after milk production is established.

Side Effects

Typical side effects associated with ovariectomy in many species include decreased activity and weight gain. The absence of gonadal hormones could affect sociosexual behavior but perhaps not as profoundly as in most other species. Although the cyclic production of estrogen by the ovaries is required for stimulation of estrus and mating behavior in virtually all species, the horse is an exception. The full repertoire of courtship and mating behavior has been displayed by ovariectomized mares and by anestrus mares during the nonbreeding season (Asa et al., 1980b; Hooper et al., 1993). The behavior was found to be hormonally supported by adrenal sex steroids (Asa et al., 1980a), for example, estrone and dehydroepiandrosterone, a weak estrogen and an androgen, respectively. In contrast with ovarian hormones, adrenal sex steroids are not secreted cyclically, so estrous behavior is displayed sporadically. No comparable study of the sexual behavior of free-ranging, nonpregnant mares has been conducted during the nonbreeding season. However, if free-ranging ovariectomized mares also show estrous behavior and occasionally allow copulation, interest of the stallion would be maintained, and this would foster band cohesion.

Immunocontraceptives

No other class of contraceptives has been as extensively researched in domestic and free-ranging equids as immunocontraceptives. Immunocontraception relies on the target species' immune system to produce an immune reaction (usually in the form of antibodies) to some target tissue or biochemical that is required for successful reproduction. The immune response is most often triggered by inoculation of the target species with biochemicals or tissues from other species that are similar in structure to the biochemicals or tissues of the host. The target animal's immune system responds to the foreign compounds injected into the body by producing antibodies that bind to both the injected, foreign compounds and the structurally similar tissues or biochemicals in the target species. The biological effects of the immunocontraceptive, aside from prevention of conception, depend on which biochemicals or tissues are the intended targets, the ability of the immunocontraceptive to induce an immune response (its immunogenicity), the specificity of the immune response to the target biochemicals or tissues, and the duration of the immune response.

In equids, the two most studied immunocontraceptives are vaccines directed against GnRH, a peptide hormone produced by the hypothalamus, and the zona pellucida, the outer membrane layer surrounding the mammalian oocyte (egg). Both are discussed below in further detail with regard to delivery routes, efficacy, duration of effect or reversibility, and side effects. This review focuses on published studies of captive and free-ranging horses, where available; otherwise, results from studies of other ungulates are used to provide an approximation of what might occur after application of the treatment to horses.

Porcine Zona Pellucida Vaccine

Sperm must bind to the zona pellucida of the oocyte to initiate the sperm acrosome reaction that is required for fertilization. Anti-zona pellucida vaccines prevent conception

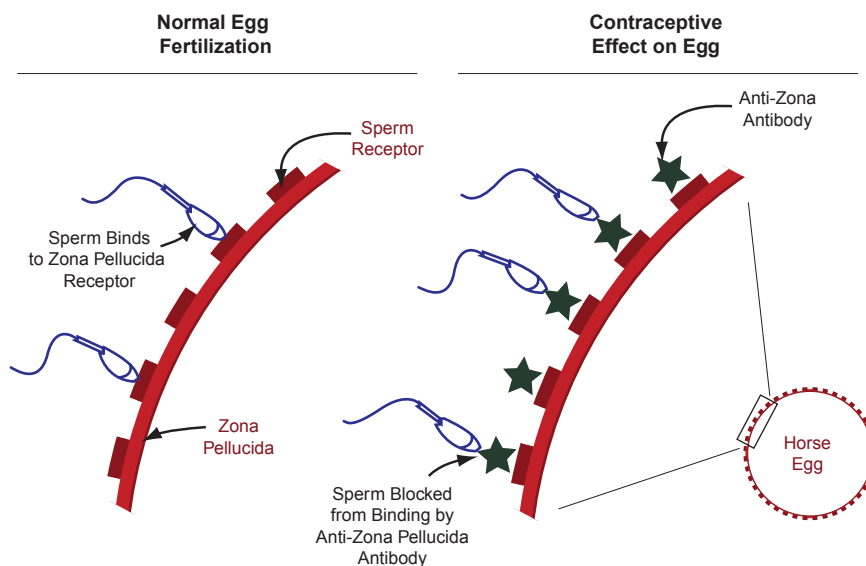


FIGURE 4-1 Mode of action of porcine zona pellucida vaccine.

SOURCE: Illustration provided by I.K.M. Liu.

late in the chain of events required for successful fertilization by preventing sperm from fertilizing eggs (Figure 4-1). There are three formulations of the PZP vaccine: a liquid formulation accompanied by a primer that is effective for 1 year (liquid PZP), a time-release pellet formulation that can be effective for up to 22 months (PZP-22), and a formulation in which PZP is encapsulated in liposomes³ to extend contraception efficacy (SpayVac®; Immunovaccine Technologies, Inc. [IMV], Halifax, Canada).

It is important to note that PZP vaccines are not a homogeneous set of compounds. The term *liquid PZP* used below refers to a PZP vaccine prepared according to the methods originally outlined for the horse by Liu et al. (1989) in which pig ovaries are finely sliced to release oocytes from surrounding tissues. The PZP in SpayVac is different in two ways. First, it is prepared differently: whole ovaries are ground and homogenized to separate oocytes from tissues (Yurewicz et al., 1983). Second, the PZP is encapsulated in liposomes to extend the period of release (Brown et al., 1997). In both procedures, the product passes through a series of filters of decreasing pore size to remove other ovarian debris, but it is possible that the SpayVac preparation contains more non-zona pellucida ovarian proteins than liquid PZP produced with the Liu et al. method. Ovarian proteins cannot reliably be separated from zona pellucida proteins by filtration, and the initial grinding and homogenization of whole ovaries in the Yurewicz et al. method results in more non-zona pellucida debris in the initial suspension. Less pure products (containing more ovarian debris) may be more immunogenic than zona pellucida proteins alone and enhance the immune response. Miller et al. (2009) suggested that the difference in antigen preparation might explain the longer duration of efficacy in their SpayVac-treated deer than in deer treated with liquid PZP, but more work is needed to determine whether antigen preparation methods

³A liposome is an artificially prepared vesicle composed of a lipid bilayer that can incorporate drugs for controlled delivery.

result in differences in PZP efficacy. Ovaries were not examined for pathological effects in horses, deer, or other species treated with SpayVac, nor were any long-term studies done on its reversibility. It is possible that SpayVac prevents fertilization by means in addition to or other than sperm blockage. Reversibility also requires further investigation. All published studies that have used SpayVac liposome preparations in free-ranging horses included the adjuvant AdjuVac™ prepared by Miller at the U.S. Department of Agriculture's National Wildlife Research Center (NWRC). However, Miller has shown that liposomes are dissolved by the lipid-based adjuvant AdjuVac, which would be expected to shorten its period of efficacy in that the liposomes were designed to prolong contraceptive effect (L. Miller, NWRC, personal communication).

It is also important to note that over the years liquid PZP has been administered to horses with several treatment protocols for the first inoculation, and the effects of the different protocols and of protocols for administering boosters are still not fully understood. For example, in the first study of liquid PZP in domestic mares, Liu et al. (1989) administered the vaccine in four initial injections at 2-week intervals, whereas much of the later work with PZP by Kirkpatrick, Turner, and colleagues (e.g., Kirkpatrick et al., 1991; Turner et al., 1997) involved two initial injections 4 weeks apart. Much of the more recent work (e.g., Liu et al., 2005; Turner et al., 2007) used single-injection protocols that appear to be more feasible in field settings. It is also unclear whether annual booster vaccinations with liquid PZP (e.g., Kirkpatrick et al., 1991) and timed-release PZP pellets (e.g., Turner et al., 2007) generate the same immunologic dynamics needed to prolong the effect of PZP. For example, the total amount of PZP released from a timed-release pellet during the boost period may differ from the amount of PZP in a liquid booster vaccination, and the duration of exposure may not be equivalent. Furthermore, the immune system may respond to these alternative antigen presentations in different ways. The immunologic dynamics induced in the target species with different treatment and boosting protocols are not yet definitively understood.

Delivery Route. Both the liquid and pellet formulations of PZP can be administered by hand to free-ranging equids that have been captured. Liquid PZP can be delivered by dart to animals in the field (Kirkpatrick et al., 1990). Pelleted PZP must be given by hand because darts cannot provide adequate pressure to release pellets into the animal effectively; this was verified in a study of pelleted PZP that was effective for 1 year: the efficacy of the hand-injected PZP was twice that of the dart-injected PZP (Turner et al., 2008). SpayVac (Brown et al., 1997) can be given by hand or dart.

Although the ability to deliver liquid PZP via dart is a useful option, it is not clear how successful attempts would be to dart populations of horses at the desired level of treatment intensity, given the large number of animals needing treatment, variability in the temperament of the horses, and the terrain of HMAs. Two studies of free-ranging horses and one of white-tailed deer have found that over time, with repeated boosters, the difficulty of approaching animals on foot for darting increased (Kirkpatrick and Turner, 2008; Rutberg and Naugle, 2008; Ransom et al., 2011). At the time the report was prepared, the most effective and most reliable method of delivery was hand injection after a gather. However, alternative methods, such as trapping near water holes or blinds, have been used in other areas and could be useful in some HMAs.

Efficacy. Liquid PZP, the first formulation produced, has been assessed for efficacy more often than other PZP formulations. The overall mean of published efficacy values in horses is 88.4 percent (median, 89 percent). Kirkpatrick and Turner's (2008) value of 95 percent is

based on cumulative experience on Assateague Island⁴ and represents the most up-to-date information available to the committee on that site. Turner et al. (1997) evaluated several adjuvant formulations.⁵ If the less effective adjuvants in their study and another study that acknowledged poorly timed boosters in one population (Ransom et al., 2011) are eliminated, the mean efficacy increases to 91.5 percent (median, 90 percent), representing hundreds of animals across several sites. In most of the studies, efficacy was assessed by determining how many treated females had foals in the following foaling season or had pregnancy diagnosed with hormone assays.

Only one study of any PZP formulation has been conducted in burros. Turner et al. (1996) found that liquid PZP significantly reduced fertility for a year after vaccination. A two-shot protocol was more effective (none of 13 females became pregnant) than a one-shot protocol (one of three became pregnant).

Turner et al. (2007) assessed a pelleted form designed to release PZP into the animal's circulatory system at 1, 3, and 12 months in 96 free-ranging mares in Nevada. Fertility rates over 4 years after vaccination were 5.2 percent, 14.9 percent, 31.6 percent, and 46.2 percent, respectively, in treated mares. The mean fertility rate of untreated females during the study was 53.8 percent. The formulation has come to be called PZP-22 because it remains about 85-percent effective after 22 months. Turner et al. (2008) concluded that the optimal time to administer PZP-22 for maximum duration of effect is fall or winter. BLM began using PZP-22 in free-ranging horses in the late 2000s. However, the efficacy has varied as treatment has been extended to additional field sites. Foaling has been reduced by 30-79 percent in the 2 years after a single injection of PZP-22 at various field sites (J.W. Turner, University of Toledo, personal communication, November 2012). The variability is believed to be due to the time of year of injection, whether delivery was by dart or by hand, the location of the injection (the hip is considered ideal, but that is not always possible when delivery is by dart), and possible differences in preparation in the field. In addition, there has been a change in vaccine production during the last few years: heat extrusion versus cold evaporation (J.W. Turner, University of Toledo, personal communication, November 2012).

Only one published study (Killian et al., 2008a) has evaluated SpayVac efficacy in horses. In a study of captive horses in Nevada, 12 mares received a single hand injection in the neck of 400 µg of SpayVac emulsified with AdjuVac adjuvant for a total volume of 1 mL in March 2003. In fall of each year, treated mares were examined for pregnancy via ultrasonography or rectal palpation, and the observations were later verified by whether a foal was born. In a few cases in which a mare's behavior prevented that kind of examination, the birth of a foal (or the absence of a birth) in spring of the following year was used to assess fertility and treatment efficacy. In the 4 years of the study, contraception efficacy in the SpayVac-treated mares was 100 percent in year 1 and 83 percent in years 2-4. Bartell (2011) determined that SpayVac in combination with nonaqueous Freund's modified adjuvant (FMA) induced the strongest immune response in domestic horses as measured by antibody titers and exhibited the strongest suppression of progesterone compared with an aqueous preparation of FMA and non-mycobacterium-based adjuvant, but she did not assess pregnancy or foaling.

⁴Assateague Island National Seashore is on a barrier island off the coast of Maryland and operated by the U.S. Department of the Interior's National Park Service (NPS). A free-ranging herd lives on the island. NPS is not subject to the Wild Free-Roaming Horses and Burros Act of 1971. Nevertheless, because it is a free-ranging population, results of studies of the use of liquid PZP on this herd can inform management of horses under BLM's jurisdiction.

⁵An adjuvant enhances the immune response by encouraging the production of antibodies.

SpayVac has also been evaluated in deer. Miller et al. (2009) evaluated SpayVac and liquid PZP in combination with different adjuvants in 30 captive white-tailed deer grouped into six treatment groups of five does each. SpayVac was administered in three preparations: with liposomes in AdjuVac emulsion, lyophilized with liposomes in AdjuVac suspension, and with liposomes in an alum adjuvant suspension. PZP was produced with two protocols (labeled IVT and NWRC for the providers of the antigen). The SpayVac/AdjuVac emulsion and the IVT-PZP/AdjuVac emulsion had the longest duration of effect: 80 percent of treated deer were contracepted for at least 5 years. Monitoring of the SpayVac/AdjuVac group ceased at 5 years; the IVT-PZP/AdjuVac continued to be effective for 7 years. The estimated decline in fecundity (fawns produced per female) was greater than 90 percent. All other formulations were inferior in performance. The authors concluded that AdjuVac is critical and should be used in emulsion form rather than suspension. They also suggested that, because of production differences, the IVT-PZP probably contained more porcine ovarian tissue and was thus more effective. Fraker et al. (2002) evaluated the efficacy of SpayVac emulsified with Freund's complete adjuvant (FCA) administered to 41 free-ranging fallow deer. Contraception of treated does was 100 percent over 3 years; however, the samples obtained in the 3 years were from different animals because some animals were culled for analysis. The authors suggested that, on the basis of the antibody titers present after 3 years, the SpayVac vaccination would probably continue to be effective for a longer period. Locke et al. (2007) evaluated SpayVac emulsified with AdjuVac over a 2-year period in wild white-tailed deer (34 treated, 11 controls) and found 100-percent efficacy in both fawning seasons. Killian et al. (2005) cited data from their studies of captive white-tailed deer in Pennsylvania that showed 80-percent efficacy in does for 4 years.

Gray et al. (2010) evaluated a PZP vaccine that was mistakenly referred to as SpayVac (Fraker and Brown, 2011; Gray et al., 2011) in 20 treated and 18 untreated free-ranging mares in Nevada over a 3-year period. The liquid-PZP vaccine was prepared as SpayVac but without liposomes. Efficacy was lower (50-63 percent) than reported by Killian et al. (2008a) for SpayVac. Gray et al. (2010) suggested that the lower efficacy might have been due to their more conservative methods of assessing efficacy in the field; however, in a follow-up published erratum, they acknowledged that the vaccine formulation that they used lacked the liposome compounds included in the SpayVac vaccine (Gray et al., 2011) and suggested that this could explain the differing results. Thus, the studies by Gray et al. (2010) should not be compared to other results for SpayVac specifically, and it is not clear whether these results should be compared to those for liquid PZP. In both the Killian et al. (2008a) and Gray et al. (2010) studies, the AdjuVac adjuvant was combined with the vaccine.

Reversibility. Immunocontraception depends on the immune response to the vaccine reaching and staying above threshold concentration (Adams and Adams, 1990; Zeng et al., 2002). Reversibility of the contraceptive effect depends on the reduction of circulating antibody titers. Substantial variability in reversal time is likely and can be due to the vaccine formulation, the adjuvant used, the treatment protocol, genetic factors, and the nutritional status of the individual animal because these factors may affect the initial and continuing immune response to the vaccine (Homsy et al., 1986; Chandra and Amorin, 1992; Turner et al., 1997, 2001, 2007; Liu et al., 2005; Lyda et al., 2005; Bartell, 2011).

In the first study of liquid PZP in equids, Liu et al. (1989) found that, of 10 feral and six domestic mares, most mares had reversed within 8 months of treatment. Kirkpatrick et al. (1990) first demonstrated that three of seven free-ranging mares became fertile in the first year after 1 year of liquid-PZP treatment, although foaling rates of treated mares overall were lower after treatment than in control mares. Turner et al. (1997) found similar results

in horses in Nevada, where 103 mares were treated with various combinations of PZP and adjuvants and 92 mares served as controls. Data from Assateague Island on reversibility continued to accumulate over the years, and Kirkpatrick and Turner (2002) stated that liquid PZP was 100-percent reversible in three mares treated for 4 consecutive years and two mares treated for 5 consecutive years. The time between final treatment and pregnancy ranged from 1 to 8 years. At the time the committee's report was prepared, none of the five mares treated for 7 consecutive years had reversed after 7 years of monitoring. In a study of 16 burros, 46.1 percent of treated females were determined to be pregnant via fecal hormone monitoring during the second year after liquid-PZP treatment (Turner et al., 1996).

Studies of longer-acting PZP formulations, such as PZP-22 (pellets) and SpayVac, have assessed reversibility more in the context of measuring the duration of effect of the vaccine; declining infertility in years after vaccination reflects reversibility. In a study by Turner et al. (2007) of 96 treated mares, 15 percent of mares had reversed after 22 months, 31.6 percent after 3 years, and 46.2 percent after 4 years. In that study, however, not every mare was assessed for reversibility every year. Turner et al. (2008) suggested that more rigorous study of reversibility in PZP-22 treated mares is warranted.

Ransom (2012) studied liquid PZP and PZP-22 in three horse populations in the western United States. Twenty-two mares on the Little Book Cliffs HMA and 38 mares on the Pryor Mountain Wild Horse Range were treated with liquid PZP up to 5 consecutive years. At the McCullough Peaks HMA, 28 mares were treated with PZP-22. Among all the sites, in mares that had foaled previously, the probability of not foaling was 74.4 percent after PZP treatment and 35.9 percent in control mares; this indicates that fertility may be suppressed after the planned period of infertility. At Little Book Cliffs and Pryor Mountains, the time from the last liquid-PZP injection to first parturition ranged from 1.5 to 8.1 years and was strongly affected by the total number of years in which the mares were treated. On average, time to parturition increased by 411 days per consecutive year of treatment. At McCullough Peaks, 64 percent of PZP-22 treated mares did not produce a foal during the post-treatment period (5 years). Return to parturition took 1.4-5.5 years. The results reinforce the notion that return to fertility after immunocontraception can be longer than expected.

SpayVac has not been thoroughly assessed for reversibility in captive or free-ranging horses, although the study by Killian et al. (2008a) demonstrated that two of 12 treated mares became pregnant 2-4 years after vaccination. The studies of SpayVac in deer described above did not systematically address reversibility, nor have they been of sufficient duration to detect decreases in vaccine efficacy (animals were contracepted at the same level of efficacy in all years of the study).

Side Effects: Physical and Physiological. Because the antigen target of PZP contraception (liquid, pellet, or SpayVac formula) is highly specific—the egg's zona pellucida—there appear to be relatively few physical side effects. Barber and Fayerer-Hosken (2000) found that PZP antibodies did not bind to other somatic tissues in horses. Liu et al. (1989) found no evidence of pathological conditions in ovaries of mares treated for 1 year; however, this remains the only study of ovarian pathology in relation to liquid-PZP treatment in horses. Bartell (2011) found that the ovaries of SpayVac-treated domestic mares were lighter, had smaller oocytes, and had thinner zona pellucidae than control mares. Killian et al. (2008a) found that SpayVac-treated mares had unexplained higher rates of uterine edema, but they cited literature (Samper, 1997) suggesting that in healthy mares this is a sign of estrus when mares are under the influence of estrogen produced by ovarian follicles. It is not known whether the extent of edema observed in the SpayVac-treated mares was equivalent to that in normal estrous mares or more severe; the latter might be a possible indication of pathology. Because

of the pathological potential, further research on uterine changes during and after treatment with SpayVac is warranted. There are no documented reports of persistent uterine edema after the use of liquid PZP or PZP-22, but comparable data on the effects identified with the use of SpayVac do not exist.

Mares that have been treated with liquid PZP for 3-7 consecutive years have been reported to have decreased ovulation rates in successive years of treatment (Kirkpatrick et al., 1992, 1995); this suggests that PZP may act at sites other than just the zona pellucida. Powell and Monfort (2001) did not find a statistically significant relationship between the likelihood of ovulatory failure and current contraception status (currently versus previously treated with PZP). It is possible that the likelihood of physiological side effects depends on the delivery of PZP as repeated vaccinations (for example, annually in the case of liquid PZP) as opposed to one long-term vaccination (in the case of PZP-22 and SpayVac).

There are many other possible causes of subfertility in horses (McCue and Ferris, 2011), but in none of the analyses described above were the same mares assessed for cyclicity before and after PZP treatment, so other possible factors contributing to subfertility were not assessed. It is estimated that about 20 percent of domestic horse mares are subfertile (I.K.M. Liu, University of California, Davis, personal communication, August 2012). Ovarian senescence has also been documented in some domestic mares over 20 years old, as evidenced by a longer follicular phase, a prolonged interovulatory interval, and later first ovulation of a breeding season (McCue and McKinnon, 2011)—all of which are reported in mares currently or previously treated with PZP (Powell and Monfort, 2001). Thus, assessing reproductive competence after many years of PZP treatment is confounded by the concomitant effects of aging.

There has been much discussion over the years of the effects of different adjuvants used in combination with PZP in relation to reactions at the injection site, which have included stiffness, swelling, nodules, and abscesses. The traditional application of liquid PZP involved an initial primer dose administered with FCA and a follow-up booster 2-4 weeks later with Freund's incomplete adjuvant (FIA). Kirkpatrick et al. (1990) were the first to mention potential concerns with using FCA in wildlife, but in their study only three of 26 treated mares had injection-site abscesses, and all healed within 14 days. One concern with FCA is its ability to produce false positive results in tuberculosis tests; this in part led to the development of FMA, which did not produce such results (Lyda et al., 2005). Chapel and August (1976) also suggested that FCA could be hazardous to people exposed to it when administering injections.

In their study of FCA and FMA use in the primer liquid-PZP dose, Lyda et al. (2005) found only one case of injection-site abscess. The mare was treated with FMA in the primer dose and FIA in the booster. The abscess appeared after the FIA booster dose, and it drained and healed without incident. Antibody titers produced with FMA and FCA did not differ significantly. Neither adjuvant had an effect on the delivery of healthy foals. The authors cited unpublished data suggesting that the incidence of injection-site abscesses was less than 1 percent when injections were given in the hip, but it was higher when injections were given in the neck.

In a large study of free-ranging horses, Roelle and Ransom (2009) found no statistically significant differences in occurrence of dart-site reactions due to adjuvant (FCA or FMA) and suggested that reactions are probably more likely to be due to dart trauma or in some cases a combination of dart trauma and adjuvant. Hand injection led to fewer injection-site reactions than darting. Overall, abscesses in response to darting were rare, in accordance with other studies (Kirkpatrick et al., 1990; Turner and Kirkpatrick, 2002; Lyda et al., 2005). Nodules at the injection site were the most common reaction (25 percent of cases), and these

persisted for up to a year or more but did not appear to affect the animals. Swelling was the second-most common reaction (11 percent and 33 percent at two study sites), and this disappeared within 30 days. Stiffness was the third-most common (1.4 percent and 11 percent at two study sites) and disappeared within 24 hours.

In their studies of both PZP and GonaCon™ (a GnRH vaccine), Gray et al. (2010, 2011) found no cases of abscesses after hand injection of either compound with AdjuVac as an adjuvant. Similar results have been found in deer when AdjuVac has been used (Locke et al., 2007; Miller et al., 2009).

Contracepted females should generally be in better body condition than uncontracepted females because they do not face the energetic demands of pregnancy and lactation. Turner and Kirkpatrick (2002) found that body-condition scores of mares on Assateague Island were significantly higher in 1999 than in 1988 before PZP contraception was widely applied. Body-condition scores of lactating females at those two times were not significantly different, and this suggests that prevention of pregnancy can enhance body condition. Ransom et al. (2010) found no difference in body-condition scores between treated and untreated mares in three western populations of horses on the basis of a similar body-condition scoring index, but mares that had foals had lower body condition than mares that did not. The most likely reason for the absence of significant body-condition differences between treated and untreated mares is that most treated mares were already pregnant when the study began and therefore did have foals at their sides during the study. In addition, some treated mares that did not respond to contraception and produced foals were exposed to the same energetic demands of gestation and lactation as untreated mares (J. Ransom, National Park Service, personal communication, May 3, 2012). In contrast, Fraker et al. (2002) found that fallow deer does treated with SpayVac had lower stores of kidney fat than untreated does; treated does might have expended more energy during the rut because they were engaged in reproductive behavior more often than untreated does.

Side Effects: Pregnancy, Birth Seasonality, and Survival. Liquid PZP has been demonstrated to be safe to administer to pregnant mares in a number of studies (e.g., Kirkpatrick et al., 1990, 1991). Turner and Kirkpatrick (2002) found that foal survival to 1 year is equivalent between untreated mares and mares treated with liquid PZP during pregnancy; female foals born to PZP-treated females also successfully bred and reared offspring. Kirkpatrick and Turner (2003) analyzed birth records on Assateague Island and found that most foals born to treated and untreated mares are born in season (April-June): 75.8 percent of births to control mares, 64.9 percent of births to treated mares, and 68.9 percent of births attributed to contraceptive failure. None of those differences was significantly different. The authors did note that out-of-season births had been increasing on Assateague Island since 1984 (the contraception management program began there in 1994) for unknown reasons. Turner and Kirkpatrick (2002) found no difference in survival between in-season and out-of-season foals but stated that it probably depends on the environment (Kirkpatrick and Turner, 2003). On Shackleford Banks,⁶ PZP-treated mares foaled over a broader range of months than untreated mares (Nuñez et al., 2010). Mares given PZP in the year before they conceived gave birth 3-4 months later than untreated mares. Mares that had been on PZP at some point before the year in which they conceived gave birth almost a month later than

⁶Shackleford Banks, part of the Cape Lookout National Seashore, is home to a herd of free-ranging horses managed by the U.S. Department of the Interior's National Park Service. Although they were not treated with PZP for as many years as the Assateague Island horses, the results of behavioral studies of the Shackleford Banks horses can inform management of horses under BLM's jurisdiction.

untreated mares. However, in an investigation of PZP contraception in free-ranging mares in Nevada, Gray et al. (2010) found no differences in foal survival, birth seasonality, or foal sex ratio between treated and untreated mares. Ransom (2012) also studied the effect of liquid and pelleted PZP (PZP-22) on birth seasonality at three sites in the western United States. Overall, mares that gave birth to foals after treatment (liquid and PZP-22 considered together) did so an average of 31.5 days later (range, 17-46) than untreated mares. Ransom stated that that effect varied among sites and PZP formulations, but these factors were confounded because PZP-22 was used exclusively at one site and not at all at the others. In addition, a monsoon rain at one site allowed a second peak in spring vegetation quality. There was no effect of treatment on foal survival; however, foal survival did decrease the later a foal was born after the peak in spring vegetation quality. Ransom indicated that the average delay in birth of a posttreatment foal results in about a 4.2-percent reduction in survival probability and that this is probably why the treatment effect was not statistically significant (J. Ransom, National Park Service, email communication, July 6, 2012). Ransom also noted that posttreatment mares that gave birth “late” in a given year would often not foal in the following year but then would foal in the third year during the normal birthing season for that site; such factors as photoperiod and temperature might be able to “reset” a mare’s reproductive system so that conception and birth occur during the normal birth season in later years.

Studies of liquid-PZP contraception in the Assateague Island horse population have also revealed effects on survival of mares. In the 4 years before 1994, when management-level contraception began, annual adult mortality was greater than 10 percent; in the first 4 years after contraception, adult mortality decreased to less than 4 percent (Turner and Kirkpatrick, 2002). It should be noted, however, that in 1990 and 1992 many deaths were attributable to an equine encephalitis outbreak and severe storms, respectively. Even so, mare mortality in 1991 and 1993 was about 3-4 percent; from 1994 to 1998, mare mortality was less than 2 percent (Turner and Kirkpatrick, 2002). There was also a shift upward in age classes in the entire herd, which indicated increased survival and the attainment of new, older age classes (Turner and Kirkpatrick, 2002). In a later study (Kirkpatrick and Turner, 2007), untreated mares were compared with mares on PZP for less than 3 years and mares on PZP for more than 3 years. Mean age at death was significantly lower in untreated mares (6.47 years) than in treated mares, and mares on PZP for more than 3 years had a higher mean age at death (19.94 years) than mares on PZP for less than 3 years (10.27 years). At the time the committee’s report was prepared, pelleted PZP and SpayVac had not been examined for effects on adult survival or demographic changes.

Side Effects: Genetic. Concerns have been raised about possible unintended genetic effects of immunocontraception. In a review of ecological and immunogenetic issues surrounding immunocontraception, Cooper and Larsen (2006) suggested that because immunocontraceptives are rarely 100-percent effective and resistance to vaccines (contraceptive failures) might have a genetic basis, managers may be unintentionally selecting for animals that do not respond to immunocontraceptive techniques. Using Falconer’s (1965) equations, they suggested that if the proportion of nonresponding females is 10 percent, which could be considered a valid estimate for liquid PZP in horses, after one generation of selection via immunocontraception, the percentage of female offspring produced that would themselves be resistant would range from 15 to 23 percent, depending on the degree of heritability of resistance to immunocontraception. The authors also suggested that such selection for non-responders could occur in the major histocompatibility complex or in genes that regulate the immune system, either of which could alter resistance to other pathogens.

However, when the committee's report was prepared, there were no data on resistance to immunocontraception, the heritability of such resistance, or the identity of specific genes that might affect responses to immunocontraceptives. National Park Service staff reported on Assateague Island that there were no indications that resistance was developing or that responses to immunocontraception were changing over time, after 19 years of herd management with PZP. Contraceptive effectiveness continues to be high (A. Turner, Assateague Island National Seashore, email communication, February 24, 2013). The immune response to immunocontraceptives depends on many nongenetic factors, such as nutritional status (Homsy et al., 1986; Chandra and Amarin, 1992; Chandra, 1996; Demas et al., 2003; Houston et al., 2007), and it was not possible for the committee to determine whether resistance to immunocontraception could develop. Similarly, it was not clear whether immunocontraception could inadvertently select for less immune-robust animals because they would not mount a strong response to PZP and would thus remain fertile. Presumably, any genetic background that would predispose animals to being immunocompromised would be under strong selection to be eliminated; even in a small population in which a deleterious mutation that compromised the immune system could become fixed, selection could act against individual animals that have the mutation, although the pressure of selection is smaller in small populations. In addition, Falconer's (1965) equations apply to threshold or "all-or-none" characters whereas lifetime reproductive success—which contraception affects—is a continuous variable that is not subject to some threshold, so it is not clear whether the Falconer model applies, although other models might. Cooper and Larsen (2006) suggested that immunocontraception could be appropriate for management of species that have long generation times, like horses, because genetic changes (if any) due to immunocontraception would take decades to develop. That would also assume that large numbers of individual animals are contracepted indefinitely and never allowed to breed; this does not seem likely if populations are managed for genetic diversity. However, those concerns highlight the importance of monitoring genetic diversity in immunocontracepted populations (see Chapter 5).

At the population level, removing females even temporarily from the breeding pool is likely to reduce the effective population size (N_e) and genetic diversity of the population. As will be discussed in Chapter 5, reducing the number of breeders or increasing the variance in family size, which will occur as more females bear no young, will reduce N_e and increase the loss of genetic variability. (Tables 5-2 and 5-3 show that some populations display low levels of heterozygosity.)

Side Effects: Behavioral. There are two important considerations in evaluating the literature on contraceptive effects on particular aspects of behavior, particularly bonds between animals and stability of social groups. First, in no published study of immunocontraception have treatment and control groups been matched or balanced with respect to other variables that might affect behavior (such as age, dominance rank, tenure in the group, group size, social or reproductive history, and characteristics of other group members). Rather, investigators have had no control over those variables and thus only compared treated with untreated (or not currently treated) females. Studies in which those factors could be controlled or specifically have their effects measured would require large samples of animals of known history and would be virtually impossible to conduct in the field or even in captivity. Second, no study has been able to differentiate the behavioral effects of a contraceptive compound administered to an animal and the resulting absence of offspring. Thus, in no case can the committee conclude from the published research that the behavioral differences observed are due to a particular compound rather than to the fact that treated animals

had no offspring during the study. That must be borne in mind particularly in interpreting long-term impacts of contraception (e.g., repeated years of reproductive “failure” due to contraception).

Gray (2009) and Gray et al. (2010, 2011) studied the effects of a liquid-PZP vaccine on behavior of free-ranging horses in Nevada during breeding and nonbreeding seasons. There were no treatment effects on activity budget, rates of sexual behavior, proximity between stallions and mares, attempts to initiate proximity, aggression given or received, or band changing by mares. Powell (1999) found no differences in spatial relationships, dominance rank, or aggression between mares currently on PZP and those not currently on PZP on Assateague Island; however, at the time of Powell’s studies, all mares had been treated with PZP at some point in the past, so true controls were not available. On Shackleford Banks, an island where some mares were never treated with PZP, changes in time budgets were observed. Many factors—such as the presence of a foal, the size of a harem, and features of the male associated with the harem—affected time spent in various activities, but a female’s contraceptive status also affected time budgets. In “best fit” general linear models attempting to identify individual and group characteristics that account for variation in the proportion of time spent in grazing and standing, a female’s contraceptive status and an interaction involving contraceptive status and a harem male’s identity had significant effects, as did total harem size and the interaction of male identity and total harem size. In general, PZP-treated females and females in large harems graze less and stand more than non-PZP-treated females and females in smaller groups, but these effects are related to the particular males with which they interact (Madosky et al., in review).

In a study of liquid and pelleted PZP in three populations of horses in the western United States, Ransom et al. (2010) found no effect of treatment on activity budgets, but they did find that treated females engaged in significantly more reproductive behavior (0.05 behavior per hour in control mares versus 0.11 behavior per hour in treated mares), which could be expected with a contraceptive that causes females to cycle repeatedly during the breeding season. Powell (1999) also found no difference in activity budgets between mares currently on PZP and those not currently on PZP. Nuñez et al. (2009) saw significantly more sexual or courtship behavior in treated mares than in controls outside the breeding season but also cited data on other temperate equids that showed that out-of-season cycling is known to occur. Powell (1999) found a nonsignificant trend for currently treated mares to engage in more social behavior overall; however, when only sexual behavior was considered, there was no effect of current contraception status on behavior (Powell, 2000). Turner et al. (1996) did not discern any differences in reproductive behavior between liquid-PZP-treated burros and untreated burros, but they did not provide quantified behavioral data. No other studies of PZP contraception in burros have been published.

The effects of liquid PZP on harem stability in horses have been studied in Nevada during breeding and nonbreeding seasons by Gray (2009) and on Shackleford Banks during the nonbreeding season by Nuñez et al. (2009) and during the breeding season by Madosky et al. (2010). Stability was also assessed on Assateague Island by National Park Service staff (A. Turner, Assateague Island National Seashore, email communication, December 13, 2011). The studies on Shackleford Banks suggest that PZP is associated with increased harem-changing by mares, whereas the Nevada and Assateague studies found no differences between treated and untreated mares in harem-changing. The studies all differ in methodological approaches, definitions of treated and untreated animals, and ecological and social contexts. No studies have been able to control all the factors that could affect harem stability in the field, which could include age, pregnancy status, characteristics of other mares and stallions in the harem, distribution of resources, stallion turnover rates,

population size and demographics, and more. Finally, harem-changing by mares occurs to varied degrees in horse populations in varied ecological contexts in uncontracepted populations (see, e.g., Feist and McCullough, 1975; Berger, 1977, 1986; Nelson, 1978; Rubenstein, 1981; Stevens, 1990; Goodloe, 1991; Jensen, 2000).

Figure 4-2 shows a frequency distribution of the percentage of mares observed changing bands in population studies before or without contraception (Feist and McCullough, 1975; Nelson, 1978; Rubenstein, 1981; Berger, 1986; Rutberg, 1990; Stevens, 1990). Values range from 8 to 61 percent (mean, 27 percent; median, 25 percent). The study by Madosky et al. (2010) found that 70 percent of PZP-treated mares changed bands; that is significantly higher than the percentage of mares that change bands in uncontracepted populations (Wilcoxon signed-rank test, $T = -18$, $p = 0.008$, $df = 7$). The percentage of control mares changing bands (33.3 percent) did not differ from that of mares in uncontracepted herds (Wilcoxon signed-rank test, $T = -6$, $p = 0.44$, $df = 7$) (analysis provided by D. Rubenstein).

Whether Shackleford Banks is a unique case or not, additional study is needed to understand whether the absence of foaling as a result of contraception has an effect on band stability. Gray (2009) argued that sexual behavior and the ability to form consortships were adequate to maintain band stability in her study in Nevada. The studies on Shackleford Banks (Nuñez et al., 2009; Madosky et al., 2010) suggest that there is an interaction between pregnancy and social cohesion. The importance of harem stability to mare well-being is not clear, but considering the relatively large number of free-ranging mares that have been treated with liquid PZP in a variety of ecological settings, the likelihood of serious adverse effects seems low.

Side Effects: Demography and Population Processes. The easiest way to envision the effect of contraception on population processes is to examine its effect on demographic vital rates

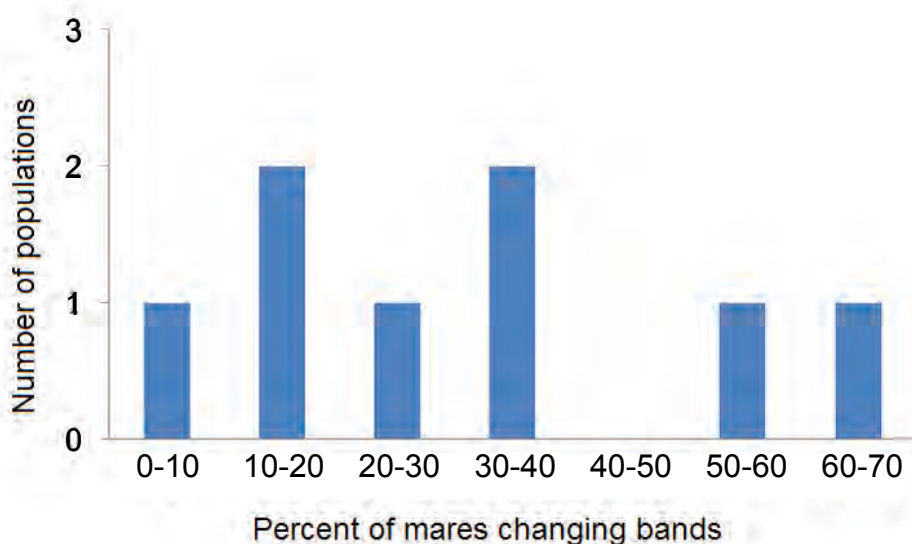


FIGURE 4-2 Percentage of band changes by mares as shown in a review of published literature. DATA SOURCE: Feist and McCullough (1975), Nelson (1978), Rubenstein (1981), Berger (1986), Rutberg (1990), Stevens (1990).

(e.g., birth and death rates) contained in the equation that approximates the intrinsic rate of population increase (r). The demographic vital rates are related to r via the Lotka-Euler equation; a reasonable approximation is

$$r \approx \frac{\ln R_0}{G},$$

where $R_0 = \sum l_x m_x$ is the net reproductive rate, and $G = \sum x l_x m_x$ is the generation time, which is proportional to age at first reproduction (α) (May and Rubenstein, 1985); l_x and m_x are age-specific survival and fecundity rates, respectively (Stearns, 1992; Gotelli, 2001). Intuitively, female fertility control effectively reduces r by reducing m_x . The degree to which r is reduced depends on the effectiveness of the fertility-control method used, the proportion of females of a given age class that are treated, and the age classes that are targeted for treatment.

Female fertility control would also have indirect and unintended consequences, which may include changes in ages at first (α) and last reproduction (ω), longevity, and the population's age structure. If young females are targeted, fertility control can potentially increase the average α . Because treated females no longer have to sustain pregnancies or lactate, their energy needs will be reduced, their body condition will improve (e.g., Kirkpatrick and Turner, 2007), and they can potentially survive better, live longer, and possibly have a longer reproductive life span. Because r correlates negatively with α and positively with ω (Oli and Dobson, 2003; Stahl and Oli, 2006), these can have contrasting effects. However, elasticity (or proportional sensitivity) patterns in age-structured populations suggest that the elasticity of population growth rate to changes in age-specific vital rates declines with age and that growth rate generally is more strongly affected by changes in α than in ω (Caswell, 2001; Oli and Dobson, 2003; Stahl and Oli, 2006). Thus, targeting younger females for contraception would be the most effective strategy if the goal is to reduce r .

Evidence suggests that repeated application of PZP can lead to prolonged infertility (beyond the treatment period), so the effects on population growth may be more dramatic in later years and longer lasting than might have been planned at the start of fertility control. Fertility control via PZP may also increase longevity in females (Kirkpatrick and Turner, 2007), and this would have both direct and indirect ecological effects. Females that survive longer will increase the number of animals using the range, and this is likely to affect the setting of appropriate management levels (see Chapter 7). However, females that live longer may or may not contribute to r via reproduction. In addition, targeting younger age classes for repeated and prolonged fertility control would affect a population's age structure and the likelihood of a given animal's contribution to the gene pool (see Chapters 3 and 5). The impact of those consequences will depend on a population's initial size and structure and should be accounted for when strategies for fertility control are developed.

Many of the behavioral changes associated with fertility control that are discussed in the preceding section are also likely to affect population dynamics. A longer breeding season could affect band stability and would probably extend male sexual activity into months when they normally recover strength and rebuild body condition. Such sexual activity in horses and other equids can involve males herding, pushing, and nudging females (and sometimes even forcing copulations [Berger, 1986]), which lower foraging success and freedom of movement (Rubenstein, 1986, 1994; Linklater et al., 1999; Cameron et al., 2009). Sexual harassment has been seen in many but not all equid populations. Where it

occurs, if levels of harassment remain high year round, both males and females could enter the breeding season in lower condition, and fertility could be compromised. Fecundity (m_x) and survival (l_x) of nontreated females could be further reduced, again limiting the population growth rate (r). Whether that cascade of events will occur in particular horse or burro populations will depend on the magnitude and interaction of three factors: environmental harshness in the nonbreeding season, social instability, and improvement of body condition in treated females due to absence of energetic demands of pregnancy and lactation. It is known from studies on Assateague Island that PZP-treated mares tend to have higher body-condition scores than females that reproduce regularly (Kirkpatrick and Turner, 2007). More recent results from Shackleford Banks show increased longevity in PZP-treated mares, probably because of their increased body condition and general health (Stuska, 2012). However, it is known that social disruption and harsh conditions during stressful periods can lower body condition (Pollock, 1980). What is not known is how those factors may interact when PZP use is extended to populations in harsher habitats or during periods of harsher climatic conditions, such as drought. It is something that will need to be monitored.

Gonadotropin-Releasing Hormone Vaccine

GnRH stimulates the pituitary gland to produce follicle-stimulating hormone (FSH) and luteinizing hormone (LH), which then stimulate growth of follicles (which produce estrogen) and ovulation. GnRH vaccines prevent the action of GnRH so that in the absence of FSH and LH the failure of follicle growth and ovulation prevents reproduction (Figure 4-3). Two formulations of the most common GnRH vaccine, GonaCon™, have been reported in the literature. Specifically, the GnRH peptide has been conjugated to a keyhole limpet hemocyanin protein (KLH) or to blue mollusk protein (B). Both formulations appear to work well, but the B formulation may be more effective (Killian et al., 2008a; Miller et al., 2008) and is less expensive to produce than the KLH formulation (K. Fagerstone, NWRC, personal communication, April 18, 2012). GnRH vaccines not identified as GonaCon in the literature will be labeled as experimental vaccines because they are formulated in a variety of ways.

Studies of GonaCon as a contraceptive in horses are rare in the published literature; studies of GonaCon in deer are more numerous. Two additional GnRH vaccines are available in other parts of the world: Equity™ and Improvac® are produced by Pfizer Animal Health, Australia. Results of studies of efficacy, reversibility, and side effects of these vaccines are discussed in this section.

Delivery Route. GonaCon™ Equine, developed by NWRC and licensed by the U.S. Environmental Protection Agency (EPA) for use in horses, can be delivered by hand injection or by dart. An experimental version of GonaCon-KLH™ was delivered by dart to white-tailed deer in New York (Curtis et al., 2002).

Efficacy. Killian et al. (2008a) studied the efficacy of GonaCon-KLH in 16 penned horses (eight controls) in Nevada and found that efficacy over the 4 years of the study was 94 percent, 60 percent, 60 percent, and 40 percent, respectively. Gray et al. (2010) evaluated the efficacy of GonaCon-B™ in 24 free-ranging horses in Nevada and found efficacy of 61 percent, 58 percent, and 69 percent during each year of the 3-year study, respectively. As mentioned above, Gray et al. (2010) used a conservative method to estimate efficacy compared with most authors who have assessed contraceptive efficacy and suggested this as one

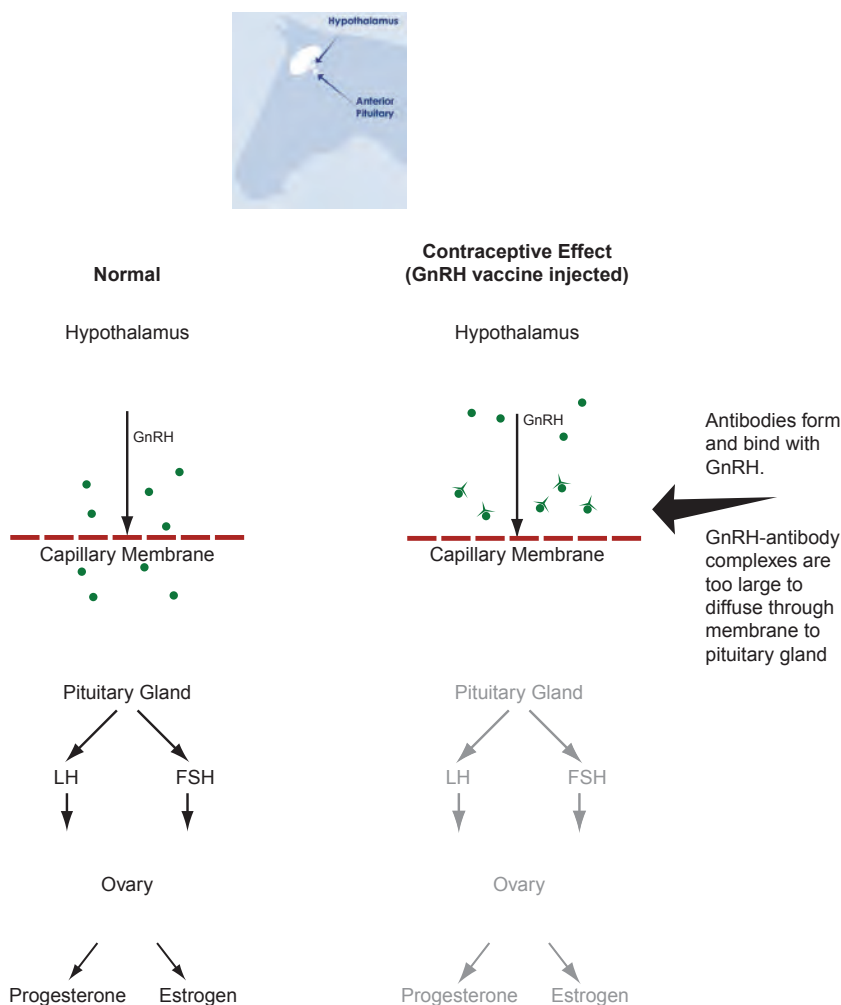


FIGURE 4-3 Mode of action of gonadotropin-releasing hormone (GnRH) vaccines.

NOTE: Without GnRH to stimulate follicle-stimulating hormone (FSH) and luteinizing hormone (LH), there is no production of ovarian estrogen or progesterone and no ovulation.

SOURCE: Adapted from Asa et al. (1996).

possible explanation for the discrepancy between their results and others' results. A second explanation put forward by the authors was potential differences in body condition between the captive and free-ranging mares used in the two studies. Research suggests that animals that have more energy reserves or are in better body condition have stronger immune systems and thus are able to mount stronger responses to foreign antigens (Chandra, 1996; Demas et al., 2003; Houston et al., 2007). In both studies GonaCon was emulsified with the AdjuVac adjuvant.

Botha et al. (2008) studied Improvac in a large sample ($n=55$ treated) of mares kept in very large pastures in South Africa. Mares were vaccinated twice (day 0 and day 35) in the middle of the breeding season. By day 35, only 14.5 percent of treated mares showed

evidence of ovarian activity as assessed with ultrasonography; at day 70, no treated mare demonstrated ovarian activity. The authors indicated that the 14.5 percent of treated mares that had evidence of ovarian activity at day 35 received their first vaccination during the luteal phase and suggested that the timing of vaccination in the ovulatory cycle is important. Imboden et al. (2006) also evaluated Improvac in nine mares by vaccinating them twice, 4 weeks apart. Ovarian suppression occurred at 4 weeks and lasted a minimum of 23 weeks, but the authors found significant variability in duration and strength of suppression that did not correlate with antibody titers.

In a study of Equity in Australia, Elhay et al. (2007) vaccinated 24 domestic mares at day 0 and boosted them on day 28. All treated mares showed reduced ovarian activity; by 4 weeks after the booster, ovaries of treated mares resembled those of seasonally anovulatory mares.

The efficacy of GnRH vaccines has also been studied in other species. In an early study with an experimental version of GonaCon-KLH, Miller et al. (2000) reported an 88-percent reduction in fawning in eight white-tailed does. In a series of studies of white-tailed deer in Maryland (n=28, Gionfriddo et al., 2009) and New Jersey (n=32, Gionfriddo et al., 2011a), GonaCon-KLH emulsified with AdjuVac resulted in 67- to 88-percent contraceptive efficacy in year 1 and 43- to 47-percent efficacy in year 2. Those values were lower than the ones reported for captive deer. Miller et al. (2008) found 100-percent efficacy in years 1 and 2 and 80-percent efficacy in years 3-5 for five does treated with GonaCon-B compared with 100 percent in year 1, 60 percent in year 2, 50 percent in years 3 and 4, and 25 percent in year 5 for GonaCon-KLH given as a single injection to five does. A two-injection protocol of GonaCon-KLH was identical in efficacy to GonaCon-B in years 1-2. Gionfriddo et al. (2011a) suggested that their efficacies were lower because their wild deer were in poorer nutritional condition and living in overgrazed habitats. However, Perry et al. (2006) found only 60-percent efficacy over 3 years in 28 captive black-tailed deer, so species differences also seem possible. Curtis et al. (2002) reported an 87-percent efficacy in 32 white-tailed deer over 2 years using an experimental version of GonaCon-KLH administered as a two-shot series in year 1 and a booster at year 2. In years 3 and 4 of their study, efficacy declined to 71 percent and 43 percent, respectively, in the absence of a booster. Fawning rates were significantly lower than those of controls in years 1 and 2.

Killian et al. (2009) evaluated two doses (1,000 or 2,000 µg) of GonaCon-KLH in 22 captive female elk over a 3-year period. Low-dose efficacy was 92 percent, 90 percent, and 100 percent over the 3 years compared with high-dose efficacy of 90 percent, 100 percent, and 100 percent; these differences were not significantly different. Ten captive female Rocky Mountain elk treated with GonaCon-B had significantly reduced pregnancy rates for 3 years (90-percent reduction in year 1, 75-percent in year 2, and 50-percent in year 3) compared with controls (Powers et al., 2011).

Efficacy of GonaCon-KLH was 100 percent in six female bison for 1 year (Miller et al., 2004). In a short-term study (12-14 weeks) of six female wild boar, 100 percent of GonaCon-treated sows became infertile (Massei et al., 2008). In another short-term study (36 weeks) of feral swine treated with two different doses of GonaCon-KLH, Killian et al. (2006) found that none of the nine sows receiving the higher dose was pregnant at the end of the study and only 10 percent gave birth during the study. Of the 11 sows receiving the lower dose, 56 percent gave birth during the study and 11 percent were pregnant by the end of the study. The authors reported 80- to 90-percent efficacy in domestic pigs in previously published studies from their laboratory.

Reversibility. Elhay et al. (2007) found that in mares treated with Equity the duration of ovarian quiescence ranged from 4 to 23 weeks in 10 of 16 treated mares. The remaining six

mares did not return to cyclicity during the study (the duration was about 34 weeks for a sample of mares monitored over a longer term). Three mares with short-duration effects (4-8 weeks) were characterized by low antibody titers. The most frequent duration of contraceptive effects was 23 weeks.

Massei et al. (2008) cited their own unpublished data on GonaCon treatment in wild boar sows that suggest that the vaccine works for several years. Miller et al. (2000) stated that their experimental version of GonaCon-KLH appeared to be reversible in white-tailed does and that infertility appeared to last for 2 years without boosting.

Side Effects: Physical and Physiological. GonaCon-B-treated free-ranging mares showed no evidence of injection-site reactions to vaccination (Gray et al., 2010). Mares treated with Improvac demonstrated significantly reduced progesterone concentrations that were still at baseline at day 175; in addition, treated mares had reduced ovarian volume (Botha et al., 2008). Injection-site reactions were transient and disappeared by day 6. In the Imboden et al. (2006) study of Improvac, vaccination significantly affected the number, size, and types of ovarian follicles, corpora lutea, and progesterone concentrations but not estradiol. Most mares showed reactions to the injections, including swelling, pain, stiffness, pyrexia, and apathy, but these signs disappeared within 5 days. The difference between these Improvac studies in occurrence and severity of injection-site reactions could be related to injections being given in the neck (Imboden et al., 2006) instead of the hip (Botha et al., 2008). Mares treated with Equity have demonstrated reduced progesterone concentrations, reduction in ovary and follicle size, and absence of corpora lutea (Elhay et al., 2007).

Kirkpatrick et al. (2011) expressed concerns about GnRH vaccines, pointing out that GnRH receptors are found in various body tissues and that GnRH can act as a neurotransmitter. GnRH can affect olfaction in rodents, can depress activity of the cerebral cortex, and is associated with two genetic disorders of the cerebellum. However, many of the results mentioned are from studies that used GnRH agonists that result in supranormal concentrations of GnRH. GnRH vaccines block rather than enhance any effects of GnRH, so the effects of the two methods would be expected to be opposite in some or all tissues that have GnRH receptors (see section below “Gonadotropin-Releasing Hormone Agonists”).

Side Effects: Pregnancy, Birth Seasonality, and Survival. In probably the earliest study of a GnRH vaccine, Goodloe (1991) found no differences in birth seasonality between treated and untreated mares on Cumberland Island, a barrier island off the coast of Georgia. She did observe significantly higher mortality in foals born to treated mares in 1 year and a non-significant trend in the same direction in the second year, but other possible effects (such as age, body condition, dominance rank, and habitat quality) were not considered. Gray et al. (2010) found no effects of GonaCon-B on birth seasonality, foal survival, or foal sex ratio in free-ranging horses. In a review of contraceptive vaccines in wildlife, Kirkpatrick et al. (2011) stated that GnRH vaccines should be safe for pregnant horses because pregnancy is maintained by the placenta in this species, but they presented no data. However, pituitary LH, which depends on GnRH, is needed for pregnancy maintenance during about the first 6 weeks of pregnancy, after which equine chorionic gonadotropin (eCG) takes over this role.

In other species, Powers et al. (2011) found that GonaCon-B administered mid-gestation to captive female Rocky Mountain elk did not affect calving or calf survival. Miller et al. (2000) found that fawns born to white-tailed does treated with an experimental version of GonaCon-KLH were normal and healthy. They did find indications that some treated does were able to produce enough LH to conceive, but the progesterone produced by the corpus luteum was not adequate to carry pregnancy to term. In a study of an experimental

GonaCon-KLH, Curtis et al. (2002) found that fawning dates of treated white-tailed does were later than those of control does in the first 2 years of the study when efficacy was high but not significantly different when efficacy was lower (less than 71 percent). Female bison treated with GonaCon-KLH in the final months of pregnancy delivered healthy calves at calving dates comparable with those of controls (Miller et al., 2004); this suggests that it can be used safely in the last trimester of pregnancy in this species.

Side Effects: Genetic. Because a GnRH vaccine is an immunocontraceptive, its potential genetic side effects (that is, its selection against a stronger immune response) would be similar to those of PZP mentioned above.

Side Effects: Behavioral. Reviews of the effects of GnRH vaccines and independent studies have suggested that GnRH vaccines have a stronger suppressive effect on LH than on FSH, so sexual behavior may not be suppressed completely in females (Thompson, 2000; Stout and Colenbrander, 2004; Imboden et al., 2006; Powers et al., 2011). That is, continued production of FSH, and later of estradiol, may support estrous behavior but without ovulation, which requires LH. An additional or alternative explanation might be continued production of adrenal sex steroids in the absence of ovarian steroids; this has been shown to support estrous behavior in domestic horses during the nonbreeding season or after ovariectomy (Asa et al., 1980b). In Gray's (2009) study of the effects of GonaCon on behavior of free-ranging horses in Nevada during both breeding and nonbreeding seasons, there were no treatment effects on activity budget, rates of sexual behavior, proximity between stallions and mares, attempts to initiate proximity, aggression given or received, or band-changing by mares. In white-tailed does previously treated with GonaCon, the recovery of estrous behavior in years 3, 4, and 5 after vaccination was suppressed when does received an additional vaccination with an anti-follicle-stimulating, hormone-releasing hormone (Killian et al., 2008b), a peptide similar in structure to GnRH.

Effects of GonaCon in Other Ungulate Species. Because GonaCon has not been tested extensively in equids, its effects in other ungulate species are reviewed in this section. Killian et al. (2008b) found that 10 white-tailed does treated with either formulation of GonaCon exhibited estrous behavior less frequently in the first 2 years after treatment, but in later years estrous behavior was displayed more often, even though does were still infertile; this suggests that estrous behavior may return before fertility is fully restored. Miller et al. (2000) found that eight does treated with an experimental version of GonaCon-KLH demonstrated the same number of estrous events, defined by bucks sniffing and chasing does, as control does during 30-44 days of observation during the rut. In their study of an experimental GonaCon-KLH, Curtis et al. (2002) found that treated does cycled later in the year during the second year of treatment than in the first year. Perry et al. (2006) found significantly reduced progesterone in female black-tailed deer treated with GonaCon-KLH. Gionfriddo et al. (2006) found no histopathological effects in a variety of tissues in 28 female white-tailed deer treated with GonaCon-KLH; 29 percent of treated does had injection-site reactions, but they were not discernible externally and were not considered serious. Gionfriddo et al. (2011a,b) found that ovaries and uteri of 32 GonaCon-KLH-treated white-tailed does were smaller than those of controls. Major organs, organ systems, and blood-chemistry parameters were normal in most treated deer (Gionfriddo et al., 2011b). When abnormalities were seen, they could not be clearly related to treatment, and treated does had higher body-condition scores than controls.

Captive female Rocky Mountain elk treated with GonaCon-B did not differ from controls in biochemistry or hematology parameters, and there was no effect on female precopulatory behavior (Powers et al., 2011). There was a nonsignificant trend for males to direct more precopulatory behavior toward treated does than at controls. Treated females did have more follicles than controls, but the follicles were smaller and fewer corpora lutea were present. The authors also commented that GonaCon-B used in conjunction with AdjuVac can cause a positive result on Johne's disease antibody testing. Injection-site abscesses occurred in 35 percent of treated does, and some lasted for years, but most treated or sham-treated animals showed some level of reaction.

Adams and Adams (1990) vaccinated 30 heifers with GonaCon-KLH mixed with Freund's complete adjuvant. All treated animals had significantly reduced progesterone, reduced uterine and ovarian tissue mass, and reduced GnRH receptor numbers. GonaCon-KLH-vaccinated female bison demonstrated suppressed progesterone (Miller et al., 2004).

Massei et al. (2008) found no effects of GonaCon on activity budgets, social rank, injection-site reactions, or hematology and biochemistry parameters in a 14-week study of wild boar sows. Treated sows gained more weight, but the gain was considered modest. In a short-term study (36 weeks) of feral swine treated with two different doses of GonaCon-KLH, Killian et al. (2006) found that treated sows had significantly reduced progesterone and numbers of corpora lutea, although females in both treatment groups showed some evidence of follicular activity. There was also evidence of regression of the uterine epithelium.

In studies of GonaCon, injection-site reactions were likely in most species, even if they were not externally visible, but these reactions appeared to be minor and relatively short-lived in most cases. Miller et al. (2008) explained that the water-in-oil emulsion that is often mixed with GonaCon is necessary to induce a long-term immune response, and it is generally accepted that some local reactions (cysts, granulomas, or sterile abscesses) at the injection site are common.

Gonadotropin-Releasing Hormone Agonists

As described above, GnRH, which is produced in the hypothalamus, initiates the cascade of reproductive hormones by causing pituitary release of FSH, which enhances follicle growth, and LH, which triggers ovulation. GnRH agonists (synthetic versions of GnRH that have activity similar to the natural hormone) are commonly used in many domestic species to stimulate follicle growth, estrus, and ovulation. Ovuplant® (deslorelin in a short-acting implant; Peptech Animal Health, Australia, now part of Virbac, France) was developed specifically to induce ovulation in domestic mares. Another GnRH agonist product, Suprelorin® (deslorelin in a slow-release implant matrix; Peptech Animal Health), was developed for use in domestic dogs and is now widely used for contraception in a broad array of captive wildlife species, including female ungulates. GnRH agonists can act as reversible contraceptives when treatment is extended for more than a few days. After the initial stimulation phase, continued administration results in down-regulation of the pituitary cells that synthesize FSH and LH. Without FSH and LH support, the ovaries become quiescent; this condition is sometimes referred to as reversible chemical ovariectomy.

Delivery Route and Efficacy

Suprelorin implants, similar in size to animal ID microchips, are inserted with a trocar, which requires brief restraint but not anesthesia. Two formulations that are active for a minimum of 6 or 12 months are available, but experience has shown that the duration of

contraception is longer in most animals—an average of 12 and 18 months, respectively.⁷ At an adequate dose, GnRH agonists are effective in females of virtually all mammal species, but they have not been tested specifically as contraceptives in horses, burros, or wild equids. Short-term treatment to control ovulation and to investigate their action on pituitary function indicates that GnRH agonists could be effective in suppressing reproduction in mares (Montovan et al., 1990; Fitzgerald et al., 1993). For example, even the short-acting product Ovuplant, designed merely to stimulate but not down-regulate reproduction in mares, has delayed return to cycling in some animals (Johnson et al., 2002). That observation suggests that continued treatment with a long-acting, slow-release implant, such as Suprelorin, would be effective for fertility control, even though the mare appears to be more resistant to pituitary desensitization than other species (Porter and Sharp, 2002).

Reversibility

GnRH agonists are considered generally reversible, primarily on the basis of studies of domestic dogs (Junaidi et al., 2003; Ludwig et al., 2009), cats (Toydemir et al., 2012), and humans (Plosker and Brogden, 1994). However, the duration of effect is greater in some individual animals, and this confounded documentation of reversal before data collection stopped in a study of domestic cats (Munson et al., 2001). In addition, long-term treatment is associated with a longer time to recovery (Nejat et al., 2000). Other studies have reported what may be permanent effects, for example, during treatment of prostate cancer in men (Murthy et al., 2007).

Side Effects

GnRH agonists have not been used often during pregnancy, so potential effects have not been systematically investigated. Possible effects can be predicted by examining another role of LH: maintenance of corpora lutea (CL) that produce the progesterone required for pregnancy to become established. However, around day 40, increasing concentrations of eCG produced by specialized cells in the uterine endometrium assume the role of stimulating CL progesterone production. Later, the fetoplacental unit takes over progesterone synthesis from the CL for the remainder of gestation. Because LH is needed for support of progesterone secretion only during very early pregnancy, treatment with a GnRH agonist after that time would be unlikely to cause abortion.

Data from captive wild canids (African wild dogs and Mexican wolves) treated with Suprelorin during pregnancy revealed an unexpected consequence of GnRH agonist treatment. Females given Suprelorin implants in early pregnancy gave birth but did not produce sufficient milk to feed their pups; this indicates that some aspect of mammary development and milk production was affected.⁸ However, initiation of treatment during lactation after milk production has been established appears to have no effect.

Effects of GnRH agonists on behavior, after the initial stimulation phase when estrous behavior might result, should be similar to those associated with ovariectomy. That is, estrous cycles would be absent, but sporadic expression of estrus supported by adrenal sex steroids might occur.

⁷Database managed by the Association of Zoos and Aquariums Wildlife Contraception Center (St. Louis, MO). Accessed July 20, 2012.

⁸Association of Zoos and Aquariums Wildlife Contraception Center database. Accessed July 20, 2012.

Repeated administration of various formulations of GnRH agonists (e.g., deslorelin acetate) for the induction and enhancement of ovulation and for the initiation of cyclicity in the transitional and anestrus phases of the estrous cycle in domestic mares is a standard and routine procedure used on broodmare farms worldwide (Squires, 2011). No adverse effects of repeated administration of these GnRH agonists have been reported in the literature over the last 2 decades since its acceptance, and they continue to be used in the manipulation of the estrous cycle in domestic mares (I.K.M. Liu, University of California, Davis, personal communication, August 2012). Because of the possibility of species differences in response, the relevance to free-ranging wildlife is unclear and deserves further study.

Steroid Hormone Treatments

Progesterone and estrogen are the hormones that change with estrous cycles and support pregnancy in mammals. However, administration of natural or synthetic forms can prevent pregnancy, usually by negative feedback on the reproductive hormone axis.

Natural and Synthetic Progestagens

In the luteal or diestrus phase of the ovarian cycle and during pregnancy, high levels of progesterone suppress the final stages of follicle growth and ovulation. Thus, synthetic progestagens are attractive candidates for contraception and in fact are widely used for that purpose in women (e.g., Implanon® implants, etonorgestrel; Depo-Provera®, medroxyprogesterone acetate in a depot vehicle for injection) and in captive wild animals (MGA implants, melengestrol acetate, Wildlife Pharmaceuticals).

Delivery Route, Efficacy, and Reversibility. Progesterone or its synthetic equivalents can be administered as implants or as injections that might be delivered remotely by dart. With a sufficient dose, the efficacy rate approaches 100 percent. Silastic implants containing a progestagen can be effective for 2 years or more⁹ and generally have a high reversal rate. The likelihood that a female will reproduce after such treatment is subject to other factors that affect fertility, such as age, health, and parity before treatment. Reversal can be hastened by removing the implant.

The vast number of studies on the treatment of mares with progesterone or synthetic progestagens have been for short-term control and timing of ovulation, not for contraception (e.g., Pinto, 2011). However, results of this body of work have shown that only one synthetic progestagen, altrenogest, is consistently effective in suppressing reproductive function in mares. Two others have been effective at very high concentrations in only some studies (Storer et al., 2009; Pinto, 2011). Those results are attributed to the specificity of the progesterone receptor in mares (Nobelius, 1992). At the time this report was prepared, the only progestagen product approved for use in domestic mares was altrenogest (Regu-Mate®). The only studies of progestagen contraception in mares used native progesterone in silastic implants to treat feral mares in holding pens in Nevada. Those placed subcutaneously in the neck area were lost, became infected, or both and so were not effective for limiting reproduction (Plotka et al., 1988). In a later study of the same population of captive feral mares, insertion into the peritoneal cavity prevented loss, and no evidence of infection was reported (Plotka et al., 1992). However, the doses of progesterone used (implants contained either 8 or

⁹Wildlife Pharmaceuticals, Association of Zoos and Aquariums Wildlife Contraception Center database. Accessed July 20, 2012.

24 g of progesterone) suppressed signs of estrous behavior but did not prevent ovulation and conception. That work was suspended also because of the invasive nature of the surgery and the unacceptable stress placed on mares (BLM, 2003, revised 2005). It is possible that treatment with altrenogest would be more successful than progesterone because synthetic steroid hormones typically have substantially higher bioactivity and affinity for the receptor and a lower metabolic clearance rate. The consequence is that smaller doses are needed for increased binding and efficacy. However, at the time of the committee's study, there was no altrenogest product that was active for more than 30 days.

Side Effects. Progesterone and synthetic progestagens support pregnancy but interfere with parturition by suppressing contractility of uterine smooth muscle. At doses high enough to be contraceptive, progestagens can block parturition, as documented, for example, in white-tailed deer (Plotka and Seal, 1989). Altrenogest is often used to maintain pregnancy and delay parturition in horses, but a study by Neuhauser et al. (2008) found that it did not prevent parturition, raising the question of its efficacy for maintaining pregnancy. However, there were some differences in health and survival of foals born to altrenogest-treated mares in that study. Although progesterone (as the "progestational" hormone) supports gestation, synthetic progestagens often have affinity for other steroid hormone receptors as well. For example, binding to androgen receptors might masculinize female fetuses, depending on the dose and stage of fetal development. However, fillies born to mares treated with the synthetic progestagen altrenogest during pregnancy (but not around the time of expected parturition) showed normal reproductive development, hormone production, and fertility (Naden et al., 1990). Progestagen treatment during lactation would not be expected to have a deleterious effect on milk production and in fact might enhance it. There are no data specifically on horses, but progestagens are a preferred method of contraception in women (Tankeyoon et al., 1984) and are not contraindicated in other species.

Side effects of progestagens vary taxonomically. Progestagen treatment of carnivores is associated with life-threatening mammary and uterine pathological conditions, whereas several uterine pathological conditions in primates (including women) are reversed by treatment with progestagens. Information on long-term administration of progestagens in equids is lacking, but extrapolation of results in other ungulates suggests that hydrometra (fluid accumulation in the uterus) might be expected.

Natural and Synthetic Estrogens

Estrogen is instrumental in the sexual characteristics of mammals and in the regulation of the menstrual cycle. Estrogen treatment can reduce concentrations of FSH and LH in the bloodstream and thus decrease the development of viable eggs.

Delivery Route, Efficacy, and Reversibility. Both natural estradiol (a specific estrogen) and synthetic ethinyl estradiol, incorporated into silastic implants, have been tested as contraceptives in captive and free-ranging feral horses (Plotka et al., 1988, 1992; Eagle et al., 1992). In the trial with 8-g estradiol implants placed in the neck of 30 feral mares in holding pens (Plotka et al., 1988), loss of many implants compromised results, but most of the mares that retained the implants mated and conceived, probably because the dose was insufficient. In a subsequent trial at the same facility, 1.5-g, 3-g, and 8-g ethinyl estradiol implants were placed intraperitoneally to prevent loss in three groups of 8-10 mares each. Contraceptive efficacy of those implants was 75 percent, 75 percent, and 100 percent, respectively (Plotka et al., 1992). Extrapolation from assays of ethinyl estradiol from blood samples up

through 21 or 30 months suggested contraceptive efficacy from 16 months (1.5-g implants) to 60 months (8-g implants). Efficacy was judged by the number of mares ovulating or pregnant according to cyclic or sustained increases in progesterone, respectively. On the basis of data on duration of efficacy, it appears that all treated mares returned to cycling, and this suggests reversibility. However, follow-up did not extend to production of young. Behavioral data were not collected, and no deleterious effects were reported.

Side Effects. Estrogens are more effective in suppressing follicle growth than progestagens, but at contraceptive doses they have been associated with serious side effects. A general action of estrogen is to stimulate cell proliferation, but it also can be mutagenic (Liehr, 2001). At the high doses required to achieve contraception, the result can be abnormal growth (hyperplasia) and even cancer (neoplasia) of organs that have estrogen receptors, such as the uterine endometrium, mammary glands, pituitary, and liver (Gass et al., 1964; Santen, 1998). In mares, estrogen is associated with uterine edema (Pelahach et al., 2002). Therefore, unopposed estrogen treatment is not prescribed; instead, estrogen is typically combined with a progestagen, which tempers its effect on most target tissues. Almost all formulations of human birth-control pills contain synthetic estrogen plus progestagen; one contains only progestagen.

Treatment of mares with estrogen stimulates estrous behavior (Asa et al., 1984), but male-like behavior has been observed with continued treatment (Nishikawa, 1959), suggesting a shift in steroid metabolism to favor conversion to an androgen. Such male-type behavior was observed (C. Asa, unpublished) in free-ranging mares in Nevada treated with ethinyl estradiol (study by Eagle et al., 1992). However, no systematic observations were conducted on expression of social or sexual behavior in the studies by Plotka, Eagle, and colleagues (Plotka et al., 1988, 1992; Eagle et al., 1992).

Combination Estrogen Plus Progestagen

As mentioned above, all formulations of human birth-control pills except one contain synthetic estrogen plus progestagen. The major contraceptive action of estrogen is to inhibit follicle growth, whereas progestagen prevents ovulation, so the combination is more effective than progestagen-only contraceptive formulations (because of the associated pathological changes, there are no commercially available estrogen-only contraceptives). The addition of a progestagen allows the use of a lower estrogen dose and reduces the probability of side effects. In addition, progestagen counters some estrogen effects, such as inhibition of estrous behavior. In general, the hormonal effect of the combination is most analogous to pregnancy.

A combination of natural progesterone and ethinyl estradiol in silastic implants was tested in captive and free-ranging mares (Plotka et al., 1992; Eagle et al., 1992) and found to be effective in preventing pregnancy or foaling, respectively. Efficacy was 100 percent in captive mares and 84-90 percent in free-ranging mares; the discrepancy was attributed to the less exact methods of assigning foals to mares in the helicopter surveys of the free-ranging herds. The combination implants, inserted intraperitoneally, were effective for 2 or 3 years. As mentioned above in connection with estrogen alone, it appears that all treated mares returned to cycling, but follow-up did not extend to production of young. Although there are no other published reports on estrogen plus progesterone treatment of equids or other ungulates, results of studies of nonhuman primates indicate a high rate of reversal (Porton and DeMatteo, 2005). No behavioral data were collected, so effects on behavior or social organization are not available.

Intrauterine Devices

Intrauterine devices were first used in domestic animals (such as camels) perhaps thousands of years ago. IUDs were a nonhormonal alternative for women in the 1960s and early 1970s that fell out of favor in the late 1970s, mostly because of problems with the Dalkon Shield (Sivin, 1993). Later analyses of IUD use in women have shown the method to be both highly effective and safe (Chi, 1993; Sivin, 1993; Rivera and Best, 2002). The precise mechanism of action of IUDs is not well described but is thought to be low-grade inflammation of the uterine endometrium provoked by the presence of the foreign object. Thus, IUDs may more appropriately be considered antigestational devices in that endometrial inflammation is not conducive to embryo implantation. Although there have been few studies of IUD use in nonhuman animals, some species may be well suited to this method.

Delivery Route, Efficacy, and Reversibility

Two studies have evaluated IUDs in domestic and captive feral horses. The first (Daels and Hughes, 1995) used a flexible, silastic O-ring, fabricated specially for the study, in six domestic mares; when compressed, it could be easily inserted into the cervix and later removed in the same way. During the breeding season after the IUDs were in place, none of the mares conceived, but all conceived after IUD removal during the next 2 years. Uterine health was monitored with palpation, ultrasonography, and vaginoscopy when samples were taken for uterine cytology and culture. Cytology and culture results were consistent with inflammation, which reversed within a week of IUD removal. It was concluded that the inflammatory response was sufficient to interfere with fertility. Mares that had IUDs in place continued to exhibit estrous cycles with the same frequency as control mares.

The second study (Killian et al., 2004), of 15 feral mares in a holding facility, used a commercially available copper-containing IUD, which is considered more effective because of the spermicidal action of copper ions (O'Brien et al., 2008). In a pilot study, the authors tested three types of copper-containing products on four mares and selected the copper T for the larger study of 15 mares. After 60 days with a stallion, 20 percent of the IUD-treated mares were pregnant compared with 75 percent of the control mares. After the second and third years, 71 and 86 percent were pregnant, respectively (Killian et al., 2006). The authors believed the pregnancies of the IUD-treated mares were due to loss of the relatively small IUDs, not to failure of efficacy, because no IUDs were found on ultrasound examination of the pregnant treated mares.

MALE-DIRECTED METHODS OF FERTILITY CONTROL

Potential methods of fertility control directed at male equids include castration, vasectomy (chemical or surgical), and immunocontraceptives. The mode of action and effects of each method are reviewed below.

Surgical or Chemical Sterilization

Sterilization of male equids can be accomplished through removal of the testes, permanent disruption of spermatogenesis, or blockage of the vas deferens to prevent the passage of sperm.

Castration

Castration, also referred to as gelding in equids, eliminates the organs that produce sperm, thereby making the male infertile. Surgical castration has been common husbandry practice for domestic equids for over 2,000 years.

Delivery, Efficacy, and Reversibility. Castration (gelding) is a routine operation for domestic male horses and is much less invasive or risky than the comparable surgery in mares. However, complications can occur at a rate of about 10 percent, including hemorrhage from the spermatic artery if not properly crushed; inadequate postoperative drainage that results in swelling, infection, or hydrocele (fluid accumulation); or even evisceration in rare cases (Blodgett, 2011). Surgical castration is, of course, permanent and is 100-percent effective in eliminating the source of sperm.

An agent for chemical castration (formerly Neutersol®, now Esterilsol™, Ark Sciences, New York City) developed for and extensively tested in domestic dogs might also be effective in stallions. A solution of zinc gluconate with L-arginine is injected into each testicle, where it causes permanent disruption of the seminiferous tubules, where spermatogenesis occurs. However, given the much larger volume of stallion testes, the technique might need modification and would require testing under controlled conditions before application in the field could be considered.

Efficacy of Esterilsol is not well established, even in dogs, in that the product is relatively new. Available data indicate that efficacy depends primarily on proper injection of the solution so that it is distributed adequately throughout the testis. It is claimed to be virtually painless (ACC&D, 2012).

Side Effects. Because castration removes the primary source of androgen production, male-type aggressive and sexual behaviors are usually reduced. Adrenal androgens (such as dehydroepiandrosterone) are still produced, but they are weaker and have much less effect on behavior than testosterone. Some geldings show less alteration in behavior after castration, potentially because of the adrenal androgen action but more probably because of individual differences in temperament, prior experience, or both and because of development of behavior patterns that are slow to disappear. Males that do not retain sufficient sex drive and aggressive competitiveness to acquire and maintain a harem could be outcompeted or supplanted by intact, fertile males.

The effects of chemical castration on testosterone production are not clear. The mechanism of action (spermicidal action of zinc gluconate) is supposed to spare the Leydig cells, which produce testosterone. However, the generalized scarring that occurs, and that is necessary for the permanent changes in testicular architecture to prevent further sperm production or release, could also affect Leydig cell structure and compromise hormone synthesis and release. The extent of the effect on testosterone production would determine the possible effects on male-type behavior.

Individual males vary in their behavioral response to castration—for example, in the loss of male-type behavior, such as aggression and sexual interest, depending on the age and sexual experience of the male. However, some or total loss of sex drive would be likely in castrated stallions, and this is counter to the often-stated public interest in maintaining natural behaviors in free-ranging horses. The effect that gelding a portion of the males in a herd would have on reproduction and behavior could not be predicted at the time this report was prepared. Aside from variability in how much male-type behavior is lost in gelded animals, the effects of gelding on reproduction and behavior in the population will also

depend on the roles that the males selected for gelding (whether harem males or bachelors) hold in the population, their reproductive and social history, and possibly their age. Keeping a portion of the male population nonreproducing by gelding could increase aggression and competition in herds or decrease it. Similarly, reproductive success may be reduced or increased. With respect to effects at the population level, it is not clear how castration of males would be better than vasectomy, which does not affect testosterone or male-type behaviors. Ultimately, the growth rate of any population that includes reproductive horses of both sexes will be commensurate with the number of fertile females in the population.

Vasectomy

Vasectomy, whether surgical or chemical, does not affect the production of sperm but does prevent ejaculation of sperm by blocking the epididymis (where sperm leave the testis) or the vas deferens (the duct that carries sperm to the urethra for ejaculation).

Delivery and Efficacy. A potential disadvantage of both surgical and chemical castration is loss of testosterone and consequent reduction in or complete loss of male-type behaviors necessary for maintenance of social organization, band integrity, and expression of a natural behavior repertoire. Vasectomy blocks passage of sperm without affecting testosterone synthesis or secretion, sparing androgen-supported natural behaviors. The most widely used vasectomy method is surgical, although there are several variations that are meant to increase efficacy, reduce production of sperm granulomas, or facilitate microsurgical vasectomy reversal (Esho and Cass, 1978; Frenette et al., 1986; Silber, 1989; Moss, 1992). After either chemical or surgical vasectomy, the average delay to passage of all remaining sperm from the vas deferens is about 6 weeks, so treatment should occur well in advance of the mares' breeding season to ensure infertility.

Surgical vasectomy in dominant stallions has been used successfully to control fertility in bands of free-ranging horses (Eagle et al., 1993; Asa, 1999). The vasectomy procedure was 100-percent effective in preventing foal production in stable bands that had no subordinate stallions, but some of the bands that had intact subordinate stallions contained foals. The stability of bands did not differ between treated and untreated groups. However, limiting treatment to dominant stallions leaves subordinate band stallions and bachelors fertile and thus reduces overall efficacy. In particular, bands that had subordinate stallions were vulnerable (Asa, 1999). The probability that subordinate stallions will mate is higher in bands that have a vasectomized dominant stallion because the females continue to have estrous cycles throughout the entire breeding season, whereas females with intact, fertile stallions are likely to conceive in the first month or so of the breeding season. Thus, females with vasectomized dominant stallions present many more opportunities for mating with a subordinate. For population control, a more effective approach would be to vasectomize a larger proportion of males, regardless of age or social status. The target number or proportion of males treated could be adjusted to achieve the level of population control recommended for each HMA.

Chemical vasectomy is a simpler, less invasive alternative to a surgical approach, but both require anesthesia. Several chemical agents have been assessed in domestic dogs and cats (Pineda et al., 1977; Pineda and Dooley, 1984). There are no published reports on chemical vasectomy in horses, but the procedure should not be difficult to adapt.

Reversibility. Both surgical vasectomy and chemical vasectomy should be considered permanent if properly done. Vasectomy reversal has been successful in humans in some cases

(Silber, 1989), but it requires microsurgery by a highly skilled surgeon, so it would not be practical for field application. Spontaneous reversal has been reported after some surgical approaches—resulting from recanalization of the vas deferens (Esho and Cass, 1978)—so the choice of technique is critically important.

Side Effects. There are no reported side effects of vasectomy, a procedure that is considered safe and effective even in humans, in whom it has become commonplace. However, in free-ranging horse herds that have vasectomized males, females that do not conceive continue to undergo estrous cycles until the end of the breeding season and continue to attract and mate with males (Asa, 1999). Thus, the number of months that males compete for and defend females is increased, and this increases the risk of injury to males and diverts time from foraging that, in some environments, could compromise a male's body condition going into winter. Those problems did not occur in the single study of vasectomy for fertility control (Asa, 1999) but might be more likely under some conditions for some males.

Winter survival of males that do lose condition may be reduced. That is likely to have a number of consequences for a population's dynamics. A lost stallion would probably be replaced quickly by a bachelor male or the mares would be taken in by dominant stallions of other bands. However, the stability of the harems taken over by younger, less experienced males would be more likely to decline (Rubenstein, 1994), and this could reduce female fecundity via increased levels of male harassment. Turnover might enhance the genetic diversity of populations, in that more males would be contributing to the gene pool and thus enhancing effective population size.¹⁰

Steroid Hormone Treatments

High doses of androgen can suppress endogenous production of testosterone via negative feedback and have a suppressive effect on spermatogenesis. Turner and Kirkpatrick (1982) treated 10 free-ranging stallions with microencapsulated testosterone propionate. Only 28.4 percent of bands that had treated stallions had foals compared with 87.5 percent of the untreated bands. Although increased concentrations of androgen could be expected to cause increased aggression, it was not reported. However, only territorial marking and sexual behaviors were analyzed. All stallions showed evidence of reversal in about 8 months. No side effects were noted.

GnRH Vaccines

As described in the section on the use of GnRH vaccines in females, treatment with GnRH vaccines interferes with the production of LH and FSH from the pituitary; in males, that results in failure of stimulation of testosterone, which is necessary for stimulation of spermatogenesis and expression of sexual behavior. However, the use of GonaCon or other experimental GnRH vaccines has not completely eliminated sperm production (Malmgren et al., 2001; Turkstra et al., 2005). Stout and Colenbrander (2004) reported that mature stallions treated with GnRH vaccines continued to produce sufficient semen to impregnate a mare.

¹⁰Genetic diversity and effective population size are discussed further in Chapter 5.

Delivery Route, Efficacy, and Physical Side Effects

In possibly the first study of GnRH immunization in domestic stallions, Malmgren et al. (2001) evaluated an experimental GnRH vaccine used with the adjuvant Equimune® in four domestic stallions (one control, three treated) during the nonbreeding season. The vaccination protocol involved five shots at intervals of 2-4 weeks. All stallions showed a response, but one male had a significantly lower antibody response than the other two. Two of the treated stallions demonstrated decreases in testosterone and more pronounced decreases in testis size and semen quality as well as changes in testicular histology, but these effects did not appear until 7-9 weeks after initial vaccination. There was no clear change in ejaculate volume.

Turkstra et al. (2005) evaluated two different adjuvants (Carbopol® and CoVaccine™ HT) with an experimental GnRH vaccine in previously hemicastrated stallions. Four animals were treated with Carbopol, and four animals were treated with CoVaccine HT. Stallions were treated during the breeding season with an initial vaccination, boosted at 6 weeks, and monitored for a total of 14 weeks after the initial vaccination. There were no injection-site reactions and no changes in body weight. The CoVaccine HT treatment was superior; treated stallions had undetectable testosterone from 2 weeks after the booster until the end of the study. Those stallions also had reduced sperm motility, but there were no adjuvant-related differences in semen volume, sperm concentration, or sperm count. Both adjuvants appeared to reduce testis size and alter testis histology in ways that would reduce fertility. The authors suggested that, aside from superior performance, CoVaccine HT is also desirable because time to effect was better defined.

Janett et al. (2009) evaluated the effects of Equity, given to five domestic stallions as three injections at intervals of 4-8 weeks, on testosterone concentrations, sexual behavior, and semen characteristics. Two stallions exhibited minor injection-site reactions that resolved in 2-3 days. Adverse effects on sperm quality were observed in four stallions, although there was individual variation in the strength and type of effect (lower sperm numbers, lower motility, and increased sperm defects), and one stallion had a weak immune response. Overall, those inhibitory effects lasted from 24 weeks to under 46 weeks.

Although not tested in stallions, GonaCon-KLH has been evaluated in a number of studies of male deer. Typical results include reduced testosterone concentrations and testis size (Killian et al., 2005; Miller et al., 2000, but see Gionfriddo et al., 2011a). Killian et al. (2005) found inactive Leydig cells and regressed seminiferous tubules that did not contain mature sperm in eight treated bucks. Gionfriddo et al. (2011b) found that 10 GonaCon-KLH-treated bucks had higher body-condition scores than untreated bucks.

One interesting finding in the Killian et al. (2005) study was that there was a high prevalence of pulmonary disease, the leading cause of mortality, in bucks in their Pennsylvania study site. The incidence of the disease was higher in treated bucks, but the authors reported that the microorganisms that cause the disease are endemic in captive deer herds in Pennsylvania. They speculated that vaccination with GonaCon could have lowered resistance to the disease.

Reversibility

In four stallions treated with Equity, testosterone remained suppressed for 24, 36, 45, and 46 weeks (excluding one low-responding stallion) (Janett et al., 2009). In a study of eight deer bucks that received different treatment protocols, Killian et al. (2005) reported that suppressive effects of GonaCon-KLH on male reproductive physiology appear to last

for 3 years, with testicular function beginning to recover in year 4; however, the authors suggested that a low level of sperm production might have persisted.

Behavioral Side Effects

Malmgren et al. (2001) found that four stallions vaccinated with an experimental GnRH vaccine first began to demonstrate reduced sexual interest and behavior 4 weeks after the initial vaccination, and the reduction appeared to persist for about 13 weeks. Libido was reduced in four stallions treated with Equity, including one that did not respond with high vaccine titers. The fifth stallion had a strong immune response and significantly reduced testosterone concentrations but maintained very strong, sustained sexual behavior (Janett et al., 2009). Kirkpatrick et al. (2011) expressed concern about the application of GnRH vaccines in stallions because testosterone-supported behaviors, which are necessary for keeping bands together, are suppressed; however, no data or citations are provided for this claim. It appears from the available data that sexual behaviors may be suppressed to various degrees by individual animal, but the effect of the suppression on other behaviors has not been assessed.

In other species, Killian et al. (2005) reported that eight GonaCon-KLH-treated white-tailed bucks had reduced libido and interest in estrous does; bucks might mount does but not completely. Miller et al. (2000) found similar effects with an experimental version of GonaCon-KLH in four white-tailed bucks and remarked that the rutting season was not extended in treated bucks. The inability of GnRH vaccines to suppress FSH completely, although central to maintenance of sexual behavior in treated females, is not likely to affect males. The possible effects on male behavior are probably limited to suppression of LH, inasmuch as LH alone is needed to support testosterone production. Thus, an adequate vaccine dose that suppressed LH should be accompanied by elimination of testosterone, a situation similar to castration. Whether male-type behavior would continue without testosterone support depends on the temperament and prior experience of the male.

Gonadotropin-Releasing Hormone Agonists

As discussed in the section on their use in females, GnRH agonists first stimulate then suppress production of pituitary and gonadal hormones involved in reproductive function. The pituitary hormones, LH and FSH, are the same as in females, but in males the gonadal hormone affected is testosterone; without testosterone, spermatogenesis is not supported. The outcome can be likened to a potentially reversible chemical castration (Junaidi et al., 2009). Although effective in males of some species, GnRH agonist treatment has had mixed results in male ungulates. In domestic stallions given various GnRH agonist formulations, some studies reported transient stimulation followed by return to baseline or lower concentrations of LH and testosterone (Montovan et al., 1990; Boyle et al., 1991), whereas others showed enhanced LH secretion or sexual behavior (Roser and Hughes, 1991; Sieme et al., 2004). No suppressive effects of what were considered high doses were detected by Brinsko et al. (1998); this led them to conclude that stallions are remarkably resistant to reproductive suppression by GnRH agonist treatment. Nevertheless, the ability of some agonists at some doses to achieve even slight suppression suggests that more potent analogues or higher doses might be effective. Newer, more potent agonists have not yet been tested adequately in stallions.

Delivery Route and Duration of Efficacy

Recent formulations, such as Suprelorin, in slow-release implants are more practical for contraceptive treatment than osmotic pumps or injections. As described in the section “Female-Directed Methods of Fertility Control,” Suprelorin is produced in 6-month and 12-month formulations. Those durations of efficacy represent minimums, and suppression continues for about twice as long in most species.

Reversibility

Suprelorin reversal rates have not been established for equids, but in male dogs the rate nears 100 percent. However, the rate has been lower in some other species,¹¹ so caution is recommended in treating a species for the first time.

Side Effects

The side effects of GnRH agonists are similar to those of castration, inasmuch as the treatment can be considered chemical gonadectomy. Because inhibition of spermatogenesis requires suppression of testosterone, any testosterone-supported secondary sex characteristics and behavior would be affected. However, as explained in the section on side effects of surgical castration, males with prior sexual experience may continue to show interest in estrous females but would probably not be able to compete successfully with untreated, intact males.

ADDITIONAL FACTORS IN EVALUATING METHODS OF FERTILITY CONTROL

The sections above included the information most relevant to understanding and choosing a method for fertility control: delivery route, efficacy, duration of effect, and possible side effects. There are, however, some additional effects that should be considered in evaluating the methods. For example, data on the effects of some contraceptive approaches on general health and longevity are accumulating. The energetic costs of pregnancy and lactation are high, and this burden is much greater on free-ranging females that must subsist on lower-quality forage than on domestic animals that have calorie- and nutrient-rich diets. Mares on Assateague Island treated with PZP that did not regularly produce foals were in better body condition and lived longer than females that were not contracepted and continued to reproduce (Turner and Kirkpatrick, 2002).

Several methods (such as vasectomy, PZP vaccines, and GnRH vaccines) are likely to be associated with a prolonged breeding season. That is, mares that are not pregnant continue to undergo estrous cycles until late summer or fall, when day length is decreasing and no longer stimulates cycling (Sharp and Ginther, 1975). Although nonpregnant females that continue to cycle expend time and energy in courtship and mating, the expenditure is considerably lower than the energetic demands of pregnancy and lactation. Thus, any effect on health and well-being of females should be negligible. In contrast, the burden on males could be greater in that the length of the breeding season, and thus the time in which males compete for and defend estrous females, is prolonged. Time spent in defending and courting females also diverts males from grazing, and this could affect health and

¹¹Association of Zoos and Aquariums Wildlife Contraception Center database. Accessed July 20, 2012.

body condition under some conditions. However, no study has focused specifically on that issue, and it warrants further investigation.

Early studies of fertility control focused on steroid hormone treatments, mirroring approaches to contraception in humans (such as birth-control pills that contain synthetic estrogen and progestagen). However, serious concerns arose regarding the tissue accumulation of synthetic steroids (testosterone in males, estrogen and progestagen in females) because they become concentrated in fat and muscle (Lauderdale et al., 1977; Hageleit et al., 2000). The potential for those compounds to enter the food chain argues against their use in free-ranging wildlife.

IDENTIFYING THE MOST PROMISING FERTILITY-CONTROL METHODS

The fertility-control methods discussed in this chapter vary considerably. The criteria most important in selecting promising fertility-control methods for free-ranging horses and burros are delivery method, availability, efficacy, duration of effect, and potential physiological and behavioral side effects. The relative importance of those criteria will probably vary with characteristics of the site (the HMA or HMA complex) and population characteristics of the equids at the site. The importance of a given criterion may also change.

The first criterion is delivery method. As they exist now, fertility-control methods can be distinguished by whether it is necessary to have an animal in hand for administration. In most cases, treatments must be delivered when animals are gathered. There are HMAs in which remote delivery (e.g., darting) is possible, but these seem to be exceptions, and investigators have reported increasing difficulty in darting animals repeatedly, as would be necessary with vaccines that require periodic boosters. In addition, some data suggest that hand injection of some contraceptives is more reliable than delivery by dart even if darting is possible for the method in question. Thus, given the current fertility-control options, remote delivery appears not to be a practical characteristic of an effective population-management tool, but it could be useful in some scenarios. However, alternative methods to gathering, such as trapping near water sources, should be considered. At the time the committee's report was prepared, no product for oral delivery was available that would be species-specific and gender-specific. Although altrenogest, an oral progestagen product, has been used successfully in domestic mares to control estrus, it requires daily dosing during the breeding season. There is no mechanism to assure delivery to mares only, so consumption by stallions, nontargeted wildlife, and domestic grazing livestock could have deleterious effects.

The second criterion, availability of the fertility-control product, includes not only the ability to obtain the product but skilled personnel to administer or conduct it correctly. The methods discussed above range from experimental products to well-established surgical procedures. Two contraceptive vaccines (liquid PZP and GonaCon) are registered with EPA for use in horses; other immunocontraceptives are available only for research application (see Box 4-1). An ideal population-management tool for horses and burros would be readily available in sufficient quantities to achieve population-level effects with little regulatory and administrative burden.

The third criterion, efficacy, is important for calculating the number or percentage of animals that must be treated to reach the target population for an HMA. Efficacy also depends on the ability to administer the treatment to a sufficient percentage of animals to achieve population-management objectives. Fertility-control methods that are highly effective (such as vasectomy) in preventing fertility may have no effect on population growth if a sufficient number of animals cannot be treated. Thus, efficacy involves both the efficacy of

BOX 4-1

Regulatory Considerations Regarding Immunocontraceptives

Licensing and registration of contraceptive products are necessary to ensure that safe and efficacious agents are used as tools for managing free-ranging horse and burro herds. In the United States, before 2006, the Food and Drug Administration Center for Veterinary Medicine was responsible for registration and licensing of such products, but the U.S. Environmental Protection Agency (EPA) has since assumed that responsibility (Eisemann et al., 2006). Extensive data are necessary for successful registration, including safety and efficacy for target species, effects on nontarget species, effects of environmental residue, and human safety. Registration is a long and expensive enterprise that discourages licensing of products that have low expected sales. Government agencies and industry have largely discontinued pursuing registration for important products that are useful to a small consumer base because of the quantity of data required and the associated expense (Fagerstone et al., 1990). Because such products are not widely used and therefore have low profit margins, they cannot generate enough profit to finance the studies required or the annual registration maintenance fees (Fagerstone et al., 1990). The cost for registration of GonaCon™ has been estimated to be \$200,000-\$500,000 (K. Fagerstone, NWRC, personal communication, 2012). Unregistered products can be used in field studies, although permits for experimental field trials are required. At the time this report was prepared, liquid PZP and GonaCon were licensed. Application to EPA for licensing pelleted PZP-22 for free-ranging horses was being prepared.

the treatment at the level of the individual animal and the efficacy at the population level, determined by the ability to administer the treatment successfully. For example, studies have found that a substantial percentage of a population (more than 50 percent) must be effectively treated to achieve reductions in population size (e.g., Garrott and Siniff, 1992; Pech et al., 1997; Hobbs et al., 2000; Kirkpatrick and Turner, 2008). It is critical that information on efficacy be integrated with population modeling to determine how many individuals in a population must be treated to achieve population goals.

Duration of fertility inhibition has major practical importance. Shorter-acting methods require substantially more effort and financial resources to implement even if the cost of the contraceptive itself is low. Longer-acting methods are preferable to minimize requirements for personnel and financial resources and to decrease the frequency of animal handling. Longer-acting methods should be used more judiciously because they remove animals from the gene pool for a longer period, perhaps permanently.

Several types of side effects were covered in the sections on the different methods in this review. Potential pain associated with administration is one consideration, although the use of anesthetics, analgesics, or both during administration may address this problem (e.g., during vasectomy). The discomfort of injections and darting is transitory and is not generally considered unacceptable. The potential of a method to cause disease or debilitation is not acceptable. That IUDs may provoke undue uterine inflammation warrants caution and would require further testing before application in the field could be considered. In addition, evidence concerning loss rates of IUDs, especially during copulation, would be needed. The possibility that ovariectomy may be followed by prolonged bleeding or peritoneal infection makes it inadvisable for field application. Potential effects of GnRH vaccines and agonists on other tissues than the pituitary gonadotrophs have not been well studied or documented and warrant caution until further research has been conducted.

Any of the methods described may also affect behavior. Because all methods affect sexual function in some way, changes in expression of sexual and social behavior should be

considered. The ideal method would not eliminate sexual behavior or change social structure substantially. Castration, ovariectomy, and the GnRH products (vaccines and agonists) eliminate or substantially reduce steroid hormone production and so have a potentially profound effect on the expression of sexual behavior. In contrast, vasectomy and the PZP vaccines result in a prolonged breeding season, with increased sexual interaction, because females continue to undergo estrous cycles but fail to conceive. That is not ideal because a prolonged breeding season can result in more fighting among males over access to females. However, the many studies of PZP vaccines and the single study of vasectomized stallions have not reported problems with increased aggression (e.g., more injuries or deaths among stallions).

Considering the above criteria, the methods judged most promising for application to free-ranging horses or burros are PZP vaccines, GonaCon vaccine, and chemical vasectomy. The advantages and disadvantages of each of these methods and their effects on behavior are shown in Tables 4-1 and 4-2, respectively. PZP vaccines are female-directed, chemical vasectomy is male-directed, and GnRH vaccines can be used to treat either males or females. Of the PZP vaccines, PZP-22 and SpayVac seem most appropriate and practical because of their longer duration of effect (especially PZP-22). They could be applied to herds immediately in a research framework, which is required because the products are not yet licensed. Research should address efficacy, duration, and side effects at the population and individual levels where possible. At the time the committee's report was prepared, there was no evidence to suggest that PZP-22 or SpayVac would have different effects from liquid PZP apart from reports of uterine edema in SpayVac-treated animals. Although GonaCon can be used and has been tested in males, the effects are similar to those of chemical castration. To achieve the suppression of spermatogenesis needed to ensure infertility, testosterone must be suppressed to at or near zero. As with surgical castration, although sexually experienced males may continue to express learned behavioral patterns, they would probably not be successful in competing with intact males. Because preserving natural behaviors is an important criterion, GonaCon seems more appropriate for use in females. Although vaccines against GnRH interfere with its action on the pituitary (stimulating FSH and LH), FSH secretion is partially independent of GnRH (Padmanabhan and McNeilly, 2001). FSH is not required for stimulation of testosterone; LH is sufficient. In females, however, FSH is important for stimulating growth of follicles, which secrete estradiol, the hormone that supports estrous behavior. The role of LH is in the final stages of follicle growth and in inducing ovulation, so blockage of LH is sufficient to prevent conception. Investigations of GonaCon treatment of mares have reported continued estrous behavior and secretion of estradiol consistent with at least partial FSH independence from GnRH control. Thus, to the extent that GonaCon preserves natural behavior patterns while effectively preventing reproduction, it is a promising candidate as a female-directed fertility-control method. However, further studies of its behavioral effects are needed. Chemical vasectomy is promising as an alternative to or in combination with treating females. However, as stated above, vasectomizing more than dominant males would be practical in application at the population level. The effects of surgical vasectomy, and presumably of chemical vasectomy, on sexual behavior closely parallel those of the PZP vaccines and possibly GonaCon.

Although all three methods extend the breeding season, the implications of this effect after vasectomy are more serious because the likelihood of late-season mating and late births would be greater. Foals born later have less time to grow and accumulate fat stores for winter, and this jeopardizes their survival. The more intact males there are in a population, the more likely late-season birth would be because mares would have a greater chance of encountering and mating with a fertile male as the season progressed. Thus, vasectomy

TABLE 4-1 Advantages and Disadvantages of the Most Promising Fertility-Control Methods

Method	Advantages	Disadvantages
PZP-22 and SpayVac® ^a	Research and application in both captive and free-ranging horses	Capture needed for hand injection of PZP-22
	Allows estrous cycles to continue so natural behaviors are maintained	Extended breeding season requires males to defend females longer
	High efficacy	With repeated use, return to fertility becomes less predictable
	Can be administered during pregnancy or lactation	Out-of-season births are possible
Chemical Vasectomy	Simpler than surgical vasectomy	Requires handling and light anesthesia
	Permanent	Permanent
	No side effects expected	Only surgical vasectomy has been studied in horses, so side effects of the chemical agent are unknown
	Normal male behaviors maintained	Extended breeding season requires males to defend females longer and may result in late-season foals if remaining fertile males mate
GonaCon™ for Females	Should have high efficacy	Only surgical vasectomy has been studied in horses, so efficacy rate is unknown
	Effective for multiple years	Capture may be needed for hand injection of initial vaccine and any boosters
	Sexual behavior exhibited	Lower efficacy than PZP-vaccine products, especially after first year
	Social behaviors not affected in the single field study	Sexual behavior may not be cyclic, inasmuch as ovulation appears to be blocked
		Should not be administered during early pregnancy because abortion could occur
		Few data on horses

^aPZP-22 and SpayVac® are formulated for longer efficacy and require further documentation of continued efficacy and of rate of unexpected effects.

SOURCE: Asa et al. (1980b), Kirkpatrick et al. (1990), Thompson (2000), Kirkpatrick and Turner (2002, 2003, 2008), Stout and Colenbrander (2004), Imboden et al. (2006), Turner et al. (2007), Killian et al. (2008a), Gray (2009), Nuñez et al. (2009, 2010), Gray et al. (2010, 2011), Powers et al. (2011), Ransom (2012).

might be more appropriate in populations in which a relatively large percentage of males could be treated. The strategy of treating only dominant stallions should be avoided.

Late-season births could occur in mares treated with one of the vaccine products if reversal occurred during the breeding season, but because most free-ranging mares give birth every other year rather than yearly, conceptions and births should become re-established in spring or early summer. For mares that are able to maintain a pregnancy and give birth annually, reversal late in the season could have long-term consequences for all her future foals in that the 11-month gestation and the one or two ovulatory cycles needed to conceive can result in an about 12-month repeating cycle (see Garrott and Siniff, 1992).

TABLE 4-2 Behavioral Effects of Fertility-Control Methods

Behavior	PZP ^{a,b}	GonaCon™ for Females	Vasectomy
Male sexual	Increase or no change reported	No change reported	Longer breeding season
Female sexual	Increase or no change reported	Decrease or no change reported	Longer breeding season
Social structure	Possible decrease in band stability	No change reported	No change reported
Activity budget	Females may graze less	No change reported	No change reported
Aggression	Males may defend females longer	No change reported	Males defend females longer
Spatial relationships	Females may spend more time near male	No change reported	No change reported

^aIncludes results of studies of both liquid and pelleted (PZP-22) formulations; not all studies reported results in all the behavioral categories, and not all studies detected changes.

^bThere are no published reports on behavioral effects of SpayVac®.

SOURCE: Rubenstein (1994), Turner et al. (1996), Asa (1999), Powell (1999, 2000), Thompson (2000), Stout and Colenbrander (2004), Imboden et al. (2006), Killian et al. (2008b), Gray (2009), Nuñez et al. (2009), Gray et al. (2010, 2011), Madosky et al. (2010, in review), Ransom et al. (2010), Powers et al. (2011).

Given that chemical vasectomy appears to be an effective means of reducing male reproduction with side effects that are likely to be minimal and not socially different from controlling female fertility, strategies that simultaneously control male and female fertility are likely to be most biologically and economically cost-effective. Because of the polygynous nature of horse and burro societies, the effect of chemically vasectomizing any one dominant harem-holding or territorial stallion will have a greater effect than contracepting any one fertile female. Moreover, because eventual male turnover is ensured, any long-term problems associated with chemical reproductive interventions are likely to be more reliably self-correcting in males than in females. When that safety factor is added to the problem of procuring large supplies of PZP vaccine in the short term, strategies of dual control allow large-scale and aggressive interventions that modeling (see Chapter 6) suggests will be necessary for regulating population growth in humane and ecologically sound ways.

Most of the PZP-vaccine research in horses (as reviewed in this chapter) has used the older, shorter-acting formulation that requires two initial injections and annual boosters. That formulation was the one licensed for use in horses at the time of the committee's study. The longer-acting formulations (PZP-22 and SpayVac) were not licensed in the United States, so they were restricted to use for research purposes and not available for widespread application for management purposes. Similarly, GonaCon was registered with EPA for use in free-ranging horses in January 2013. Many state veterinary licensing agencies require that a vasectomy be performed by a licensed veterinarian, although the surgery is straightforward, but the simpler chemical vasectomy has not been systematically evaluated in horses, so testing in captive horses would be needed before widespread application in the field.

CONCLUSIONS

On the basis of the peer-reviewed literature and direct communication with scientists who are studying fertility control in horses and burros, the committee considers the three

most promising methods of fertility control to be PZP vaccines (in the forms of PZP-22 and SpayVac), GonaCon, and chemical vasectomy. Chemical vasectomy requires capture and handling, which could be straightforward in areas where BLM regularly gathers horses. It is more problematic in areas where it could be difficult or impossible to capture a sufficient number of animals for treatment to achieve a population effect. In addition, the efficacy of the two vaccines is higher if they are hand-injected rather than delivered by dart. Even in the case of liquid formulations of the vaccines that can in principle be delivered by dart, adequate delivery cannot be ensured. In addition, darting typically entails following animals by helicopter, which could be as stressful as gathering. Alternative methods for gaining closer access to animals for delivering injections should be sought for areas where gathering is not practical or possible.

The vaccines can be effective for multiple years, but chemical vasectomy should be considered permanent. In cases in which reversibility is important and repeated treatment is practical, one of the vaccines would be preferable, with the caution that treatment for more than a few years may prolong recovery of fertility. A single treatment that induces lifetime infertility could be preferable in other situations.

Even if a large fraction of a population's males are chemically vasectomized and the sterility is permanent, the effects of such an extensive intervention on the dynamics of the population will be self-correcting. If gathers are an average of 5 years apart, younger males rising through the ranks as bachelors or adopting alternative routes to adulthood (Rubenstein and Nuñez, 2009) will be adding new genes to the pool at an increasing rate. Given that virtually all burro and some horse populations exhibit low levels of genetic heterozygosity, virtual elimination of local male fertility for short periods to allow translocations of males that have desired genetic characteristics into the population may be warranted. Such large-scale local chemical vasectomies would allow managers to enhance genetic diversity and reduce inbreeding of populations at risk. Moreover, it would be a self-correcting process as younger males that have the original genetic constitution mature and compete for reproductive opportunities with translocated males. Managing genetic diversity through translocation is discussed more thoroughly in the next chapter.

All three methods should preserve the basic social unit and expression of sexual behavior, although there have been conflicting reports on various effects of the vaccines on social interactions and on the cyclicity of estrous behavior. The major effect of the methods is that the typical breeding season would be extended for females that do not conceive (the implications are discussed at length above). No method has yet been developed that does not have some effect on physiology or behavior. However, the effects of not intervening to control or manage population numbers are potentially harsher than contraception; in the absence of natural predators, population numbers are likely to be limited by starvation (see Chapter 3 for discussion of the effect of density-dependent factors). Even if there were a method that had no effect other than preventing the production of young, the absence of young would alter the age structure of the population and could thereby affect harem dynamics. The most appropriate comparison that should be made in assessing the effects of any method of fertility control is with the current approach, gathering and removal. That is, to what extent does the prospective method affect health, herd structure, and the expression of natural behaviors relative to the effects of gathering? Three methods (PZP-22 and SpayVac, GonaCon, and chemical vasectomy) are considered the most promising for managing fertility in free-ranging horses and burros because they have the fewest and least serious effects on those parameters. In addition, although their application requires handling the animals—gathering—that process is no more disruptive than the current method for controlling numbers, and it lacks the further disruption of removal

and relocation to long-term holding facilities. Considering all the current options, the three methods, either alone or in combination, offer the most acceptable alternative for managing population numbers. However, further research is needed before they are ready for widespread deployment for horse population management.

The current major gaps in knowledge about PZP-22, SpayVac, and GonaCon include a thorough understanding for each vaccine of percentage and duration of efficacy and the extent of its reversibility. GonaCon should be examined to evaluate the extent to which treated females continue to exhibit sexual behavior, which is important for maintaining natural social interactions. A study is needed to assess the efficacy and safety of potential agents for chemical vasectomy before it is used in free-ranging stallions during gathers.

In light of the extensive research that has been conducted with liquid PZP, the likelihood that PZP-22 or SpayVac will produce new or unexpected effects, other than an extended duration of action, is small, and this should reduce the scope of research that would be needed. Furthermore, given the decades of research on the earlier liquid formulation of PZP and its successful application in numerous free-ranging horse herds, liquid PZP can be used in many herd areas now. It might be applied not only in herds that are amenable to darting but during gathers for horses that are turned back onto the range. Even without a booster in the months just after a gather, any later inoculation will serve as a booster and initiate a period of infertility (J.W. Turner, University of Toledo, personal communication, August 2012). Thus, liquid PZP could serve as an interim fertility-control method until one of the other longer-acting methods is available.

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5

Genetic Diversity in Free-Ranging Horse and Burro Populations

This chapter reviews the relationship between genetic diversity and the long-term health of free-ranging horse and burro herds. It does that by reviewing genetic studies conducted on 102 horse Herd Management Areas (HMAs) and 12 burro HMAs under the jurisdiction of the Bureau of Land Management (BLM) and comparing the results with those of studies of other species and herds for evidence of an optimal level of genetic diversity that might be used as a management target. It also examines the idea that BLM's free-ranging horse and burro herds can be considered a metapopulation, or a "population of populations that are spatially discrete but connected through natural or assisted immigration" (Levins, 1969). Metapopulation theory can be used to suggest directions for management activities that might be undertaken to attain and maintain the level of genetic diversity that is needed for continued survival and reproduction and for adapting to changing environmental conditions.

THE CONCEPT AND COMPONENTS OF GENETIC DIVERSITY

Genetic studies provide essential data for the management of populations, including estimates of the levels and distribution of genetic diversity, assessments of ancestry, and the detection of genetically distinct populations. At the population level, genetic diversity can be measured as the mean number of variants of a gene (alleles) or as the proportion of individuals that have different variants of a gene (heterozygosity). Theoretical and empirical studies have demonstrated substantial fitness costs associated with the loss of genetic diversity in both free-ranging and captive populations (Lacy, 1997; Saccheri et al., 1998; Crnokrak and Roff, 1999; Slate et al., 2000; Brook et al., 2002; Keller and Waller, 2002; Spielman et al., 2004). In small populations or populations that suffer size bottlenecks,¹ allelic diversity is lost relatively quickly through random genetic drift, but heterozygosity is less affected. In small populations that are isolated, inbreeding is inevitable and occurs within only a few

¹A population bottleneck is a large reduction in population size over one or more generations.

generations. Whereas inbreeding does not change allele frequencies, it results in a change in the proportion of individuals that carry two alleles at a locus that are identical by descent and decreases heterozygosity. Thus, it is important to measure and monitor allelic diversity, observed and expected heterozygosity (H_o and H_e), and coefficients of inbreeding (F_{is}) in managed populations.

Genetic diversity in a population results from a number of evolutionary forces: mutation, natural selection, gene flow, and genetic drift. Although mutation is the ultimate source of all genetic variation, mutation rates of most genes are low and cannot replenish diversity quickly once it is lost (Lande, 1995). The effects of natural selection depend on whether it is directional, stabilizing, or balancing selection.² Regardless of the kind of natural selection exerted on a population, when a population is small, only strong selection will affect the level of diversity (Frankham et al., 2010). In contrast, the recruitment of even a small number of unrelated breeding individuals into a population (gene flow) can increase genetic diversity or prevent its loss. Genetic drift—random change in allele frequencies between generations—is a strong force in small populations and can result in rapid loss of genetic diversity (Frankham et al., 2010).

A related issue is the detection of populations that are genetically distinct because of low gene flow and are thus functioning independently (Moritz, 1994). In such isolated populations, genetically based adaptations to local environmental conditions may arise. If management actions involve translocations (movement) of individuals among populations, genetic data will help to guide the choices of donor and recipient populations.

RESEARCH ON GENETIC DIVERSITY IN FREE-RANGING POPULATIONS SINCE 1980

In the late 1970s, when the National Research Council Committee on Wild and Free-Roaming Horses and Burros reviewed the state of the science, nothing was known about the genetics of free-ranging equids. The committee's 1980 report found that "no information exists about these populations concerning . . . the amount of genetic variation within populations, the amount of genetic differentiation between populations, and the pattern of genetic relatedness ('phylogeny') of the wild populations and the domestic breeds" (NRC, 1980, p. 93). Furthermore, no information on the amount of genetic variation within or between breeds of domestic equids existed (NRC, 1980). Therefore, that committee recommended that genetic studies be conducted to assess the genetic health of the herds. The lack of information regarding the ancestry and lineages of free-ranging equids was also identified as a concern.

As a result, BLM awarded a grant to the University of California, Davis (UC Davis) for a study of free-ranging horse genetics. From December 1985 to October 1986, researchers collected 975 blood samples from five horse populations under BLM management in Oregon and Nevada. A total of 19 genetic loci known to be polymorphic³ in domestic horses were screened (seven red-cell antigens and 12 isoenzyme and serum proteins) and used to estimate levels of genetic diversity and differentiation among herds and to investigate herd

²Natural selection can take three forms in a population. In directional selection, the frequency of an allele increases because of its greater fitness (its ability to help the individual survive and reproduce). Stabilizing selection decreases the frequency of alleles that have lower fitness, that is, alleles that hinder an individual's chances to reproduce. Directional and stabilizing selection can continue until a beneficial allele is fixed in the population or the detrimental allele is eliminated. In balancing selection, more than one variant of a gene is maintained in the population, and individuals carrying more than one variant of a gene may have a genetic advantage in their environment.

³Containing more than one allele.

ancestry. The results, which were reviewed by the Committee on Wild Horse and Burro Research and published in the National Research Council's report *Wild Horse Populations: Field Studies in Genetics and Fertility* (NRC, 1991), indicated that free-ranging herds did not differ from domestic herds with respect to levels of genetic diversity (heterozygosity and allelic diversity) and that differentiation among herds was less than that among breeds of domestic horses. With regard to herd ancestry, the results were consistent with the hypothesis that herds originated from escaped or released domestic horses.

Studies by E. Gus Cothran at the University of Kentucky and Texas A&M University have been conducted since 2000 to monitor genetic diversity in individual free-ranging horse herds and assess their genetic similarity to domestic horse lineages. The earliest of these studies used the same types of genetic loci used by the UC Davis researchers (17 isozyme and serum proteins), but more recent studies have used 12 highly polymorphic microsatellite DNA loci⁴ (Goldstein and Pollock, 1997). The more recent studies have made substantial progress in comparing existing populations with exemplars of New World and Old World domestic breeds and have yielded valuable information about herd ancestry and lineages. Furthermore, although the 1980 National Research Council report identified a lack of information on the genetic variation of both free-ranging horse and burro herds, the UC Davis study did not include samples from burros. Cothran has studied 12 burro herds with nine microsatellite loci. This chapter reviews the results of Cothran's studies, comparing them with published results on genetic diversity of free-ranging donkey populations in Spain and Sicily (Aranguren-Mendez et al., 2001, 2002; Guastella et al., 2007; Bordonaro et al., 2012).

THE RELEVANCE OF GENETIC DIVERSITY TO LONG-TERM POPULATION HEALTH

The probability of natural gene flow in free-ranging horses and burros varies among herds. In some herds, management actions have included removals that had unknown effects on the levels and distribution of genetic diversity. Isolation and small population size, in combination with the effects of genetic drift, may reduce genetic diversity to the point where herds suffer from the reduced fitness often associated with inbreeding. That would compromise the ability of herds to persist under changing environmental conditions.

Inbreeding

Inbreeding depression, defined as a reduction in fitness due to the loss of diversity and the expression of deleterious genes that can accompany inbreeding, can be difficult to detect, especially in wild populations, and the relationship between inbreeding depression and extinction risk is not clear (Lacy, 1997). Crnokrak and Roff (1999) reviewed the literature on wild populations known to be inbreeding to determine what levels of inbreeding depression were occurring and whether they had important fitness effects. They found that most estimates of inbreeding depression (169 estimates in 35 species and 137 traits) were high enough to be biologically important, and most of the traits that they surveyed were directly related to fitness; this allowed them to conclude that inbreeding depression is detectable 54 percent of the time in species known to be inbred. Keller and Waller (2002) established that inbreeding depression occurs in the wild, is measurable, and can influence population viability. They cited literature on agricultural systems that demonstrated that the cost of a 10-percent increase in inbreeding leads to a 5- to 10-percent loss of fitness.

⁴Microsatellite loci contain tandem repeats of one to six base pairs and are commonly used as molecular markers to detect genetic variation and relatedness among individuals in a population.

In fact, Lacy (1997) could find no evidence that any mammalian species is unaffected by inbreeding.

In addition to diseases related to genetic mutations, a species may demonstrate conditions or abnormalities and reduced fitness due to inbreeding. Some of the evidence on inbreeding depression or correlations between low genetic diversity and fitness traits in ungulates is reviewed below. There is evidence in horses that inbreeding avoidance occurs in the harem band as fathers and stepfathers avoid copulating with related young mares (Berger, 1986; Berger and Cunningham, 1987). However, that does not preclude inbreeding at the population level inasmuch as both sons and daughters disperse from the natal group and may associate later in life as adults.

Reproductive Physiology, Reproductive Success, and Offspring Survival

Inbreeding results from reproduction by two related parents. If the ancestries of the parents are known with a high degree of certainty, a pedigree can be constructed, and the coefficient of relatedness (the inbreeding coefficient, F) of the offspring can be calculated on the basis of the relatedness of the parents. In free-ranging populations, however, relatedness among breeding individuals is rarely known but can be estimated by using biparentally inherited DNA markers such as microsatellite loci (Eggert et al., 2010) or single-nucleotide polymorphisms (SNPs; Li et al., 2011). The use of genetic markers to estimate pairwise relatedness between individuals can be problematic primarily because of incomplete sampling, the overall low variance in relatedness among individuals in natural populations, and the need for large numbers of markers to produce precise estimates (Csillery et al., 2006; Pemberton, 2008; Li et al., 2011). Genetic estimates of inbreeding coefficients at the population level can also be problematic; they have been found to be strongly affected by the size, history, and genetic diversity of the founders (Ruiz-Lopez et al., 2009). Thus, although there are potential problems with both pedigree-based and molecular genetics-based estimates of inbreeding, both can provide information about inbreeding that is useful for population management.

Data on inbred ungulates suggest a negative relationship between inbreeding and reproductive health. In Cuvier's gazelle, Gomendio et al. (2000) found an inverse relationship between inbreeding levels and ejaculate quality. The Texas state bison herd, which was founded by only five individuals in the 1880s, has statistically significantly lower genetic diversity than herds in Yellowstone and Theodore Roosevelt National Parks. Halbert et al. (2004) found semen abnormalities in four of eight tested bulls from the Texas state herd. In Przewalski's horse mares, Collins et al. (2012) found a significant association between mean urinary estrogen over an ovulatory cycle and mean kinship, a measure used to quantify relatedness between individuals in a population (Lacy et al., 1995). Mares that had higher mean kinship had lower estrogen concentrations.

In a study of sequential ejaculates from Shetland pony stallions, van Eldik et al. (2006) found that higher inbreeding coefficients based on pedigree data correlated with lower sperm quality in the form of lower percentages of progressively motile and morphologically normal sperm. Those effects were apparent even at relatively low inbreeding levels ($F = 0.02$) and worsened with increasing inbreeding. In contrast, Aurich et al. (2003) studied single ejaculates from Noriker draught horse stallions and found no correlations between semen quality and heterozygosity at microsatellite loci.

Luis et al. (2007) analyzed the genetic structure of the Sorraia horse breed, which has populations in Germany and Portugal and is characterized by relatively high levels of inbreeding ($F = 0.363$). They found low genetic diversity compared with other breeds and

stated that further analysis showed that inbreeding levels correlated negatively with adult fertility and juvenile survival (C. Luis, Universidade de Lisboa, Portugal, unpublished results). In addition to abnormalities in semen quality, the Texas state bison herd was characterized by lower natality and higher calf mortality than other captive bison herds (Halbert et al., 2004). In a study of red deer on the Isle of Rhum, Scotland, Slate et al. (2000) found that lifetime breeding success in both females and males (as measured by the number of calves produced) correlated positively with heterozygosity at nine microsatellite loci. Finally, in a study of 12 species of ungulates maintained in zoos, Ballou and Ralls (1982) demonstrated that infant mortality was higher in inbred than in noninbred offspring in 11 of 12 species of ungulates and that inbreeding was the only possible explanation for the observed differences.

Disease

Sasidharan et al. (2011) found that populations of mountain zebra affected by sarcoid tumors, which are known to have a partially genetic basis, had lower genetic polymorphism, lower expected heterozygosity, and lower gene diversity and higher values of internal relatedness and homozygosity than populations that were not affected by these tumors. Although the trends were clear, the differences were not statistically significant. Ragland et al. (1966) described an outbreak of sarcoids in horses in which affected animals were related and originated from a highly inbred family line.

Congenital Defects

Zachos et al. (2007) conducted a genetic analysis of a herd of about 50 red deer known to have descended from no more than eight individuals. The genetic diversity shown by data that the authors provided did not appear to be significantly lower than that in other red deer populations, but in this population a number of cases of brachygnathy,⁵ which is believed to be associated with inbreeding in deer (Renecker and Blake, 1992), have been observed.

In horses, the condition known as club foot is defined as “a flexural deformity of the coffin joint resulting in a raised heel; not to be confused with the club foot deformity of humans” (Siegal, 1996). Although the condition is suspected to have a genetic basis, to the committee’s knowledge this has not been confirmed. Club foot has been reported in free-ranging horse herds, but it is not a life-threatening or “limited-use” condition.

Clinical Issues Related to Genetics in Horses

Aside from concerns about the deleterious effects of inbreeding, there are concerns related to the genetics and health of horses. Similar concerns may exist for burros, but the committee could find no publications about clinical issues related to genetics.

According to Brosnahan et al. (2010) and Finno et al. (2009), 10 or 11 conditions in horses are known to be caused by genetic mutations. All are single-gene, autosomal mutations inherited in a Mendelian fashion (Brosnahan et al., 2010). Although all are considered rare, they have had important effects on major breeds. Some of the conditions are lethal, but others are not, so the mutations can spread in herds, especially when inbreeding occurs. Commercial testing is available for all except the mutation involved in lavender foal

⁵Brachygnathy, also known as parrot mouth, is the underdevelopment of the lower jaw.

syndrome. Very few of the conditions present clinical signs that would be unambiguous and discernible during a gather of horses that includes large numbers of unknown animals that are grouped for relatively short periods (e.g., days) and are not under constant, individual observation. However, because many of the conditions can be diagnosed via genetic screening of blood or hair samples, surveillance of the genetic mutations underlying them is possible in HMAs. Screening of samples from gathered horses could be used to generate frequencies of the alleles involved in these disorders, and the frequencies could be monitored during later gathers in order to determine whether a particular HMA has a higher occurrence of a given mutation that might affect the fitness of the herd. The conditions that seem to be immediately discernible on observation are discussed below on the basis of clinical data provided by Brosnahan et al. (2010) and Finno et al. (2009).

Junctional epidermolysis bullosa is a trait known to affect Belgians, other draft breeds, and American Saddlebred horses. The condition is most often observed in foals, which demonstrate irregular, reddened erosions and ulcerations on the skin and mouth over pressure points. Ocular and dental abnormalities co-occur in some cases. Another notable manifestation of the condition is complete sloughing of the hooves in foals, which is terminal.

Overo lethal white foal syndrome or *ileocolonic aganglionosis* presents in the form of an all white or nearly all white hair coat in foals and an underlying intestinal obstruction. Affected breeds include American Paint Horse, Quarter Horse, and rarely Thoroughbreds. Diagnosis of the condition is difficult because of the wide variation in phenotype in these breeds and associated ambiguous language related to color patterns. The condition is terminal.

Grey horse melanoma is found in many breeds and is manifested as a gray coat in conjunction with dermal melanomas. The melanomas themselves are not typically life-threatening, but they may metastasize to other organs.

Arabian horses are the primary breed affected by *lavender foal syndrome* or *coat color dilution lethal*. Affected animals' coats appear silver, pink, or lavender. Other clinical signs include seizures, dorsiflexion of the head and neck, hyperaesthesia, and recumbency. Progressive neurological dysfunction is also observed. The condition is terminal. Testing is not available commercially but was in development at the time of the committee's study.

Hereditary equine regional dermal asthenia is known to affect Quarter Horses and horses from a Quarter Horse lineage. Signs include seromas, hematomas, open wounds, scars, and sloughing of the skin. In addition, the skin is loose and is easily separated from the underlying fascia. In areas of hair regrowth, white hairs are typical of this condition. Skin lesions can be treated, but euthanasia is the typical outcome. Testing is available.

For most of those clinical conditions, an aberration in coat color pattern is the most discernible and unambiguous cue. Although limb deformities or abnormal gait patterns are clinical signs in some conditions, they may be due to nongenetic factors. Regardless of the underlying causes, phenotypic data have not been recorded and integrated into the genetic management of free-ranging herds. Recording the occurrence of phenotypic data associated with diseases and clinical issues along with information on the age and sex of the affected animals would allow BLM to monitor the distribution and prevalence of a number of genetic conditions that have direct effects on herd health.

Genetics and Population Viability

The maintenance of genetic diversity in a population is a function of the genetic effective population size (N_e ; Wright, 1931, 1938), which is defined as the size of an idealized

population that would experience the same magnitude of random genetic drift as the population of interest (Conner and Hartl, 2004) and can be estimated with genetic or demographic data. Populations that have experienced fluctuating sizes between generations, unequal sex ratios, or high variance in reproductive success are likely to have effective population sizes that are lower than the number of animals present; Frankham's (1995) review of effective population size estimates in wildlife concluded that they are usually at least an order of magnitude lower.

It was originally thought that an effective population size of at least 50 was necessary to avoid short-term inbreeding depression, but empirical work suggests that if maintenance of fitness is important, effective population sizes much larger than 50 are necessary. Theoretical studies suggest that the figure could be closer to 5,000 for several reasons. First, new genetic variation from mutations is added to a population more slowly than originally thought (Lande, 1995). Mutations with large effects tend to be detrimental and are removed from the population by natural selection, so the overall mutation rate does not accurately predict the infusion of new genetic variation. Second, the effects of inbreeding depression are likely to be more severe in stressful environments (Jiménez et al., 1994; Pray et al., 1994). Finally, slightly deleterious mutations may accumulate in smaller populations and lead to a decline in fitness (Lynch and Gabriel, 1990; Charlesworth et al., 1993; Lande, 1994).

A related concern is whether there is a general rule that would help managers to decide how large a population needs to be to remain genetically and demographically viable in the long term (Flather et al., 2011a,b). Flather et al. (2011b) argued that a general rule of thumb is not scientifically defensible given the variation among species, their evolutionary history, the habitats that they occupy, and the threats to their survival. However, they agreed with previous suggestions that multiple populations totaling thousands, rather than hundreds, of individuals will probably be necessary for long-term viability of species.

At the time of the committee's study, the total population of horses on BLM land exceeded 31,000. When that population is considered as a whole, concerns regarding minimum viable population (MVP) size are not important. However, this population exists in many smaller, fragmented units. Only a small fraction of the HMAs or HMA complexes contain more than 1,000 horses, so no single HMA or complex could be considered to have an MVP size for the long term, although the analyses cited above suggest that horse populations on HMAs or HMA complexes that are larger than 1,000 do have a greater than 50-percent probability of survival for 100 years. In addition, it does not appear to be realistic to attempt to manage each HMA or HMA complex with a goal of a minimum of 5,000 animals. Therefore, management of the HMAs as a metapopulation, in the form of natural and assisted movement of animals between HMAs, will be necessary for long-term persistence of the horses at the HMA or HMA-complex level. Movement of animals will need to be guided by a number of genetic, demographic, behavioral, and logistical factors, discussed later in this chapter.

In contrast with horses, the total population of free-ranging burros is estimated at only about 5,000 and is therefore at what scientists would consider an MVP size. These animals exist in fragmented units, each of which has a population size well below the MVP size; as in the case of horses, it is unrealistic to consider increasing the population in each unit to 5,000. Genetic monitoring and movement of burros between HMAs is therefore more necessary than it is for horses to maintain the overall population for the long term. The same factors that would inform movements of horses would apply to movements of burros.

IS THERE AN OPTIMAL LEVEL OF GENETIC DIVERSITY IN A MANAGED HERD OR POPULATION?

In a survey of genetic diversity levels in mammals, Garner et al. (2005) found an average heterozygosity value of 0.677 ± 0.010 in healthy populations. For 16 species, they compared healthy populations with ones that had experienced a demographic challenge and found a strong association between demographic threats and the loss of heterozygosity (healthy mean, 0.715 ± 0.240 ; demographically challenged mean, 0.525 ± 0.040). They also found evidence of differences in genetic diversity among families within orders of mammals. Genetic diversity in free-ranging horses and burros in HMAs should be compared with genetic diversity detected in other free-ranging and domestic herds to determine the health of a herd or population, depending on the management goal.

Genetic Diversity in Free-Ranging Horses

Table 5-1 compares estimates of genetic diversity of free-ranging populations (Sable Island, eastern Canada; Colonial Spanish horses known as the Marsh Tacky, found in South Carolina, the Florida Cracker, and populations on Shackleford Banks, Corolla, and Ocracoke Islands, North Carolina; southern European native horse breeds; and Assateague Island, Maryland), domestic breeds, and the endangered Sorraia horse breed (Portugal and Germany), which was founded in 1937 with three stallions and seven mares. The studies have shown that the mean observed heterozygosity was below that observed in healthy mammal populations for the Sorraia and Colonial Spanish horse populations and for some domestic breeds. Observed heterozygosity was on a par with that in healthy mammal populations of free-ranging horses on Sable Island and Assateague Island, breeds from Canada and Spain, some domestic breeds, and some southern European native breeds.

TABLE 5-1 Estimates of Genetic Diversity of Free-Ranging and Domestic Horses

Population	Allelic Diversity	Observed Heterozygosity	F_{is}	Reference
Sable Island	5.60 ± 1.35 SD	0.647 ± 0.035 SD	0.070	Lucas et al., 2009
Sorraia	3.32 ± 0.95 SD	0.450 ± 0.212 SD	-0.061 to 0.018	Luis et al., 2007
Domestic breeds from Canada and Spain	5.50 ± 0.42 SE to 8.25 ± 0.57 SE	0.66 ± 0.02 SE to 0.79 ± 0.04 SE	-0.046 to 0.083	Plante et al., 2007
Southern European native horse breeds	5.75 ± 1.54 SD to 8.08 ± 1.93 SD	0.687 ± 0.170 SD to 0.772 ± 0.099 SD	Not estimated	Solis et al., 2005
Domestic breeds (10 breeds, 191 individuals)	3.6 ± 0.3 SE to 4.5 ± 0.4 SE	0.494 ± 0.057 SE to 0.626 ± 0.058 SE	Not estimated	Vilà et al., 2001
Colonial Spanish horse populations (five)	4.00 ± 1.27 SD to 7.73 ± 2.05 SD	0.54 ± 0.18 SD to 0.74 ± 0.10 SD	-0.069 to 0.058	Conant et al., 2012
Assateague Island	7.4 ± 1.8 SD	0.794 ± 0.102 SD	Not estimated	Eggert et al., 2010

NOTE: SD = standard deviation; SE = standard error.

Genetic Diversity in Horses Managed by Bureau of Land Management

Genetic studies have been conducted by E. Gus Cothran for many of the HMAs (Table 5-2). The results of the studies have shown that genetic diversity varies among HMAs. Allelic diversity values range from 2.58 (Liggett Table, OR) to 8.00 (Warm Springs, OR, and Paisley Desert, OR), observed heterozygosity values range from 0.497 (Cibola-Trigo, AZ) to 0.815 (Hog Creek, OR), and inbreeding coefficient values range from -0.230 (Nut Mountain, CA) to 0.133 (Lahanton Reservoir, NV). The lowest allelic diversity and heterozygosity found in the HMAs are consistent with those in the endangered Sorraia breeds and the Colonial Spanish horse populations, all of which are small, isolated herds.

The management goal, as stated in the BLM's *Wild Horses and Burros Management Handbook* (BLM, 2010), is to keep the observed heterozygosity (H_o) of all herds no lower than one standard deviation below the mean in the BLM herds. In the 2012 Cothran reports, the free-ranging feral horse mean H_o was listed at 0.716 with a standard deviation of 0.056, and the value below which a herd was considered at critical risk was listed in the BLM handbook as 0.66 for DNA estimates and 0.31 for blood group estimates. By those standards, herds in eight HMAs listed in Table 5-2 are at risk because of low heterozygosity. If the same criterion is applied to allelic diversity (mean number of alleles [MNA]), the goal would be 4.97 alleles/locus (mean, 6.06; standard deviation, 1.09), and an additional HMA would fall below the acceptable level. An examination of Table 5-2 reveals that herds in 34 HMAs have observed heterozygosity or allelic diversity values between the mean and the value at which a herd is considered at critical risk and should be managed and monitored routinely to detect decreases in diversity or improvements as the result of management actions. One HMA—Liggett Table, OR—has low heterozygosity, extremely low allelic diversity, and a small appropriate management level (AML). Its low inbreeding coefficient is surprising, in that it is inconsistent with expectations under those conditions. The Cothran report for this HMA notes that one horse was destroyed because of an unspecified congenital defect.

Each of the Cothran reports includes information on the percentage of variants (microsatellite alleles) that have frequencies below 0.05 because these rare variants are the ones most likely to be lost if population size declines or not all individuals reproduce equally. It is important to note that although some microsatellite loci have been implicated in human disease (Wooster et al., 1994), the dinucleotide (2-bp repeat motif) microsatellite loci used in the Cothran studies are found in regions of DNA that are unlikely to directly affect the fitness of individuals. In those studies, microsatellite loci were used as proxies to test for overall levels of genetic diversity and to assess levels of inbreeding. Managing for the preservation of microsatellite alleles that are rare in an HMA would not be expected to increase fitness, and this approach is not recommended in any of the Cothran reports.

Evidence of Strong Associations with Spanish Bloodlines

Phenotypic similarities and historical records have suggested that several HMAs have high concentrations of old Spanish blood and thus may be assigned high priority for conservation. Cothran's studies have addressed that, using both blood group polymorphisms, which reveal alleles that have strong associations with Spanish bloodlines, and microsatellite loci. Because the blood group polymorphisms provide clear evidence and the microsatellite loci do not, the results that he presented to the committee were based only on blood group data. He found evidence of Spanish blood in the Cerbat Mountains, AZ; Pryor Mountains, MT; and Sulphur, UT, HMAs. The Cerbat Mountains herd is largely isolated, but the reports show that the Pryor Mountain and Sulphur herds both have Spanish blood

TABLE 5-2 Genetic Diversity in Free-Ranging Horses in Herd Management Areas Determined by Using 12 Microsatellite Loci

Herd Management Area	State	N	Year Sampled	AML	H_o	H_c	F_{is}	MNA	Cothran Report Date—Comments
Cerat Mountains									
Cibola-Trigo	AZ	24	2005	150	0.497	0.490	-0.014	4.17	04/15/08
<i>Arizona mean value</i>									
					0.497	0.490	-0.014	4.17	
California									
Bitner	CA	21	2012	25	0.734	0.713	-0.029	5.92	05/15/12
Buckhorn	CA	31	2010	85	0.806	0.749	-0.076	6.42	10/20/10
Carter Reservoir	CA	60	2009	35	0.689	0.688	-0.001	6.33	10/04/10
Centennial	CA	69	2001	168	0.665	0.709	0.062	6.92	11/19/01
Chicago Valley	CA			12					
Coppersmith	CA	53	2009	75	0.708	0.703	-0.007	6.33	10/05/10
Fort Sage	CA			29					
Fox Hog	CA	115	2012	220	0.717	0.730	0.018	7.42	05/18/12
High Rock Canyon	CA	35	2012	120	0.774	0.773	-0.001	7.75	05/17/02
Massacre Lakes	CA			35					
New Ravendale	CA			25					
Nut Mountain	CA	47	2011	55	0.770	0.752	-0.230	7.33	05/14/12
Piper Mountain	CA			17					
Red Rock Lakes	CA			25					
Round Mountain	CA			10					
Twin Peaks - Gilman	CA	13	2011	758	0.724	0.764	0.052	6.67	04/28/11
Twin Peaks - S Observ	CA	52	2011	758	0.710	0.754	0.058	7.67	04/28/11
Twin Peaks - Skeddadle/Dry Valley	CA	28	2011	758	0.673	0.744	0.096	6.92	04/28/11
Wall Canyon	CA	14	2012	25	0.708	0.709	0.001	6.00	05/23/12
<i>California mean value</i>									
					0.723	0.732	0.005	6.81	

Little Book Cliffs	CO	29	2002	150	0.745	0.721	-0.034	6.25	05/28/03
Piceance-East Douglas Creek	CO	32	2006	235	0.635	0.640	0.007	4.67	06/01/10
Sand Wash Basin	CO	50	2001	362	0.730	0.723	-0.009	6.50	04/16/02
Spring Creek Basin	CO	15	2007	65	0.689	0.702	0.018	5.08	06/21/10
<i>Colorado mean value</i>					0.700	0.696	-0.005	5.63	
Black Mountain	ID	25	2010	60	0.720	0.704	-0.023	6.42	03/03/11
Challis	ID	46	2002	253	0.743	0.735	-0.010	6.42	09/15/03
Four Mile	ID	25	2003	60	0.740	0.691	-0.071	5.75	06/14/04
Hard Trigger	ID	30	2010	130	0.764	0.733	-0.042	6.50	03/01/11
Sand Basin	ID	25	2003	64	0.782	0.726	-0.077	6.33	06/14/04
Saylor Creek	ID	50	2010	50	0.767	0.748	-0.025	6.42	12/17/10
<i>Idaho mean value</i>					0.753	0.723	-0.041	6.31	
Pryor Mountains	MT	103	2009	120	0.757	0.762	0.007	6.58	09/02/10 Evidence of Spanish blood
<i>Montana mean value</i>					0.757	0.762	0.007	6.58	
Antelope	NV			324					
Antelope Valley	NV	28	2011	259	0.765	0.756	-0.012	6.75	06/13/11
Augusta Mountains	NV	29	2011	308	0.770	0.756	-0.018	6.58	04/26/11
Bald Mountain	NV	97	2009	215	0.759	0.775	0.021	7.58	08/13/10
Black Rock East	NV	31	2012	93	0.710	0.753	0.057	7.00	05/30/12
Black Rock West	NV	19	2012	93	0.675	0.654	-0.032	5.67	05/30/12 Monitor closely and consider introducing two to four new mares
Buffalo Hills	NV	51	2009	314	0.724	0.729	0.008	7.00	08/05/10
Calico Mountains	NV	40	2012	333	0.748	0.723	-0.035	6.92	05/24/12
Callaghan Austin Allot	NV	40	2009	237	0.742	0.780	0.049	7.25	08/12/10

continued

TABLE 5-2 Continued

Herd Management Area	State	N	Year Sampled	AML	H_0	H_e	F_{is}	MNA	Cothran Report Date—Comments
Callaghan East Allot	NV	40	2009	incl	0.765	0.791	0.033	7.75	08/11/10
Clan Alpine	NV			979					
Desatoya	NV	25	2003	180	0.703	0.707	0.005	6.00	05/05/04
Diamond	NV			151					
Diamond Hills North	NV			37					
Diamond Hills South	NV			22					
Dogskin Mountains	NV			15					
Eagle	NV			210					
Fish Creek	NV	23	2005	180	0.790	0.758	-0.042	7.00	06/03/08
Fish Lake Valley	NV			54					
Flanigan	NV			125					
Fort Sage	NV			36					
Fox Lake Range	NV			204					
Garfield Flat	NV			125					
Goshute	NV	28	2011	123	0.765	0.748	-0.022	6.50	06/15/11
Granite Peak	NV			18					
Granite Range	NV	40	2012	258	0.760	0.737	-0.032	7.08	05/24/12
Horse Mountain	NV			95					
Hot Creek	NV			41					
Jackson Mountains	NV			217					
Kamma Mountains	NV			77					
Lahontan	NV	28	2004	10	0.595	0.687	0.133	5.50	07/01/04
Lava Beds	NV			148					
Little Fish Lake	NV	40	2005	39	0.703	0.748	0.060	6.75	05/30/08

Little Humbolt	NV	23	2010	80	0.743	0.742	-0.001	6.58	12/09/10
Little Owyhee Fairbanks	NV	10	2004	298	0.775	0.704	-0.101	5.42	02/29/08
Little Owyhee Lake Creek	NV	10	2004	298	0.764	0.713	-0.072	5.67	02/29/08
Little Owyhee Twin Valley	NV	10	2004	298	0.760	0.737	-0.031	5.83	02/29/08
Maverick-Medicine	NV			276					
Montezuma Peak	NV	46	2010	4	0.737	0.707	-0.043	6.33	12/16/10
Montgomery Pass	NV			100					
Nevada Wild Horse Range	NV			500					
New Pass/Ravenswood	NV	52	2007	566	0.780	0.771	-0.013	7.42	07/07/10
Nightingale Mountains	NV			126					
North Monitor	NV			8					
North Stillwater	NV	50	2008	205	0.670	0.722	0.072	6.75	07/07/10
Owyhee	NV			231					
Palmetto	NV			76					
Pancake	NV			493					
Paymaster	NV	49	2010	38	0.748	0.702	-0.066	5.83	12/10/10 High incidence of club foot
Pilot Mountain	NV			415					
Pine Nut Mountains	NV	26	2003	179	0.670	0.687	0.026	6.08	04/27/04
Red Rock (Bird Springs)	NV	23	2006	27	0.786	0.743	-0.059	6.08	06/18/09
Reveille	NV	51	2010	138	0.753	0.715	-0.054	6.50	12/17/10
Roberts Mountain	NV	29	2008	150	0.730	0.740	0.013	6.42	07/15/10
Rock Creek	NV	28	2010	250	0.738	0.745	0.010	6.00	12/17/10
Rocky Hills	NV	64	2009	143	0.759	0.774	0.019	7.33	08/06/10
Sand Springs West	NV			49					
Saulsburly	NV	25	2007	40	0.773	0.768	-0.007	6.83	06/17/10
Seven Mile	NV	27	2005		0.756	0.748	-0.011	6.58	06/03/08
Seven Troughs	NV			156					

continued

TABLE 5-2 Continued

Herd Management Area	State	N	Year Sampled	AML	H_0	H_e	F_{is}	MNA	Cothran Report Date—Comments
Shawave Mountains	NV	28	2003	73	0.783	0.762	-0.027	6.50	06/04/04
Silver King	NV			128					
Snowstorm Castle Ridge	NV	10	2004	140	0.659	0.718	0.082	5.42	02/29/08
Snowstorm Dryhill	NV	9	2004	140	0.750	0.616	-0.218	4.25	02/29/08
South Shoshone	NV	52	2008	100	0.761	0.770	0.012	7.33	07/21/10
South Stillwater	NV	42	2003	16	0.705	0.716	0.015	5.58	04/07/04
Spruce-Pequop	NV	26	2011	82	0.750	0.709	-0.058	5.75	06/16/11
Stone Cabin	NV	50	2007	364	0.763	0.775	0.015	7.67	06/16/10 Some incidence of club foot
Tobin Range	NV			42					
Triple B	NV			518					
Warm Springs Canyon	NV	28	2010	175	0.729	0.719	-0.014	7.17	11/04/10
Wassuk	NV			165					
Wheeler Pass	NV	26	2007	66	0.756	0.763	0.008	7.08	06/16/10
Whistler Mountain	NV			24					
<i>Nevada mean value</i>					0.739	0.734	-0.008	6.49	
Bordo Atravesado	NM	27	2011	60	0.787	0.749	-0.051	6.08	04/25/11
Carracas Mesa	NM			23					
<i>New Mexico mean value</i>					0.787	0.749	-0.051	6.08	
Beaty's Butte	OR	32	2010	250	0.747	0.763	0.020	6.67	11/04/10
Cold Springs	OR	24	2010	150	0.806	0.754	-0.068	6.00	11/11/10
Coyote Lake/Tule Springs	OR	50	2011	390	0.792	0.766	-0.034	7.33	05/09/12
Hog Creek	OR	14	2003	50	0.815	0.739	-0.103	6.00	05/13/04

Jackies Butte	OR	40	2011	150	0.750	0.742	-0.010	7.17	04/30/12
Kiger	OR	40	2011	82	0.671	0.695	0.034	5.83	03/29/12 Morphologically unique Spanish blood not confirmed
Liggett Table	OR	17	2010	25	0.500	0.448	-0.115	2.58	11/12/10 Horse destroyed for unspecified defect
Murderers Creek	OR	71	2009	35	0.696	0.707	0.015	6.25	09/23/10
Paisley Desert	OR	83	No year	150	0.743	0.780	0.047	8.00	E.G. Cothran, Texas A&M University, email communication, December 21, 2011
Palomino Buttes	OR			64					
Pokegama	OR			50					
Riddle Mountain	OR	21	2011	56	0.679	0.657	-0.034	5.50	03/29/12
Sand Springs	OR	15	2011	200	0.772	0.759	-0.017	6.67	05/08/12
Sheepshead/Heath Creek	OR	48	2011	302	0.790	0.787	-0.004	7.25	05/09/12
South Steens	OR	31	2010	304	0.758	0.741	-0.023	6.92	10/19/10
Stinkingwater	OR	24	2010	80	0.726	0.680	-0.067	5.50	04/07/10
Three Fingers	OR	50	2011	150	0.710	0.753	0.058	7.25	04/30/12
Warm Springs	OR	83	2010	202	0.766	0.778	0.015	8.00	04/05/11
<i>Oregon mean value</i>					0.733	0.722	-0.018	6.43	
Bible Spring	UT			60					
Cedar Mountain	UT	20	2002	390	0.742	0.726	-0.021	6.08	09/23/03
Chloride Canyon	UT			30					Low diversity and dwarfism per 2001 Blawn Wash HMA report
Choke Cherry	UT			30					
Confusion	UT			115					
Conger	UT			80					
Four Mile	UT			60					
Frisco	UT			60					

continued

TABLE 5-2 Continued

Herd Management Area	State	N	Year Sampled	AML	H_0	H_e	F_{is}	MNA	Cothran Report Date—Comments
Kingtop	UT			40					
Mount Elinor	UT			25					
Muddy Creek	UT	33	2001	125	0.619	0.638	0.029	5.33	01/03/02
North Hills	UT	28	2002	36	0.807	0.710	-0.136	6.00	09/09/02
Onaqui Mountain	UT	40	2005	210	0.298	0.282	-0.053		06/03/08 Values for blood groups
Range Creek	UT	26	No year	125	0.663	0.707	0.061	5.25	E.G. Cothran, Texas A&M University, email communication, December 21, 2011
Sulphur Herd N	UT	53	2009	250	0.682	0.732	0.067	6.33	07/29/10 Evidence of Spanish blood
Sulphur Herd S	UT	41	2009	250	0.679	0.715	0.050	5.83	07/29/10 Evidence of Spanish blood
Swasey	UT			100					
Tilly Creek	UT	25	2002	50	0.609	0.617	0.013	5.08	04/29/03
<i>Utah mean value</i>									
					0.637	0.641	0.001	5.70	
Adobe Town	WY	103	2010	800	0.776	0.776	0.000	7.75	04/21/11
Antelope Hills	WY	25	2004	82	0.747	0.733	-0.018	6.33	03/05/08
Conant Creek	WY	22	2004	100	0.680	0.656	-0.035	5.50	03/06/08
Crooks Mountain	WY			85					
Dishpan Butte	WY	30	2004	100	0.768	0.743	-0.034	6.33	03/06/08
Divide Basin	WY	60	2011	600	0.785	0.787	0.003	7.75	05/15/12
Fifteenmile	WY			160					
Green Mountain	WY			300					
Little Colorado	WY	45	2011	100	0.761	0.768	0.009	6.67	05/07/12
Lost Creek	WY	30	2009	82	0.775	0.788	0.017	6.67	10/14/10
McCullough Peaks	WY	50	2004	140	0.755	0.715	-0.055	6.33	07/06/06

Muskkrat Basin	WY	27	2004	250	0.731	0.727	-0.006	6.00	03/06/08
Rock Creek Mountain	WY			86					
Salt Wells Creek East	WY	33	2003	365	0.760	0.782	0.027	7.83	05/06/04
Salt Wells Creek West	WY	25	2003	365	0.763	0.745	-0.025	6.58	05/06/04
Salt Wells Creek-Marvel Gap	WY	25	2010	365	0.813	0.775	-0.050	6.67	04/11/11
Stewart Creek	WY	30	2009	175	0.750	0.751	0.002	6.42	10/18/10
White Mountain	WY	60	2011	300	0.701	0.715	0.020	7.58	04/30/12
<i>Wyoming mean value</i>									
Comparison from Cothran reports:									
Mean horse HMAs									
					0.716	0.710	-0.012	6.06	
Standard deviations									
					0.056	0.059	0.071	1.09	

NOTE: Blue shading indicates observed heterozygosity or MNA values below the mean minus one standard deviation. Gray shading indicates values below the mean. N = number of animals sampled, AML = appropriate management level, H_o = observed heterozygosity, H_e = expected heterozygosity under Hardy-Weinberg equilibrium, F_{is} = inbreeding coefficient, MNA = mean number of alleles per individual. For Herd Management Areas listed without genetic data, neither data nor reports were provided to the committee for review.

DATA SOURCE: Genetic analyses of Herd Management Areas provided by E. Gus Cothran. To access the data, contact the National Research Council's Public Access Records Office at paro@nas.edu.

mixed with that of non-Spanish breeds. The Kiger, OR, herd, which contains morphologically distinct horses, may have had some Spanish ancestry, but it is not possible to distinguish between that and indirect ancestry through possible Quarter Horse introductions in the same area. The Lost Creek, WY, herd also has some evidence of Spanish ancestry that may be indirect.

Genetic Diversity in Free-Ranging Burros

Far less research has been conducted on genetic diversity in free-ranging donkeys and burros than in horses. Aranguren-Mendez et al. (2001) studied five endemic Spanish donkey breeds using 14 polymorphic microsatellite loci. Their results indicated little differentiation among breeds and moderate genetic diversity within breeds (allelic diversity, 8.7 ± 4.4 alleles/locus; H_e , 0.637–0.684). In a similar study, Guastella et al. (2007) studied three Sicilian donkey breeds, including the endangered Pantesco breed, using 11 microsatellite loci. They also found low differentiation among breeds and moderate genetic diversity (allelic diversity, 4.1–6.5 alleles/locus; H_e , 0.500–0.618). However, they detected high levels of inbreeding in one of the breeds (F_{is} , 0.230). In a later study using 14 microsatellite loci, Bordonaro et al. (2012) confirmed low diversity (allelic diversity overall, 6.07 ± 0.72 alleles/locus; H_e , 0.581 ± 0.059) in the Sicilian breeds. Although the diversity in the Spanish breeds was within the confidence limits of levels in healthy mammalian populations (Garner et al., 2005), the lower allelic diversity and heterozygosity in the Sicilian breeds approached the levels in unhealthy populations.

Genetic Diversity in Burros Managed by the Bureau of Land Management

Genetic studies of 12 burro HMAs have been conducted by Cothran and compared with his previous studies of domestic burro populations. The loci used for burros include nine of the 12 used for the free-ranging horse studies. Summary data for samples collected from domestic burro populations and genotyped in the Cothran laboratory are provided in Table 5-3.

All burro HMAs on which genetic data were obtained had diversity measures below 0.66, the value used for horse HMAs, and all had values lower than those reported for the Spanish and Sicilian donkeys. Five of the 12 HMAs had diversity values at least one standard deviation below the mean value obtained from the four domestic donkey breeds.

Cothran's reports do not provide information regarding the provenance of the four domestic donkey breeds that he used for comparison, nor does he provide dates on which they were sampled. However, his results suggest that domestic donkeys in the western United States have lower genetic diversity than Spanish and Sicilian donkey breeds in that both allelic diversity and heterozygosity measures are lower. Only 12 of the 28 HMAs have had genetic studies of free-ranging burros. Of the remaining 16 HMAs, seven had AMLs over 50 and nine had AMLs under 50. All but one of the reports on burros provided to the committee involved samples collected during 2001-2005.

Optimal Genetic Diversity in Herd Management Areas

Although the BLM *Wild Horses and Burros Management Handbook* (2010) does not differentiate between horses and burros, the target heterozygosity value for both clearly was derived from horse studies. The current method of maintaining free-ranging horse HMAs at observed heterozygosity (H_o) values that are no lower than one standard deviation below

the mean will become problematic. When this value is recalculated with repeated surveys, it will decrease as allelic diversity is lost from herds when animals die or are removed to maintain AMLs (see Chapter 7). Unless there is gene flow between HMAs, inbreeding in individual HMAs is inevitable and will result in lower genetic diversity and individual fitness. The goal is to maintain as much as possible of the standing genetic diversity, so the mean heterozygosity and allelic diversity as they stand today are more appropriate targets over a reasonable timeframe (such as 100 years).

Monitoring of genetic diversity may be easiest if samples are collected during each gather. Blood samples may be collected from a representative sample of horses for analysis, and the first survey results can be used to determine a baseline value. If that value is below the mean of the BLM horse HMAs, that HMA should be identified as a target for translocation of horses from other HMAs (see section “Translocation for Genetic Restoration” below). Samples should be collected from each HMA for genetic monitoring at least once every 5 years. If genetic diversity (either heterozygosity or allelic diversity) is statistically significantly lower than that detected in the previous survey, the HMA should be assigned high priority for genetic management.

The target level of diversity for free-ranging burros is unclear but appears to be based on levels in four domestic donkey breeds of unknown provenance previously studied by Cothran. Although they provide a local comparison, a more appropriate comparison would be with the free-ranging Spanish donkey breeds studied by Aranguren-Mendez et al. (2001).

The committee found that Cothran had conducted multiple genetic studies for several HMAs since 2000. Besides providing estimates of current genetic diversity, the second report on each of those HMAs discussed changes in diversity since the previous one. That valuable information allows BLM to evaluate the effectiveness of management actions aimed at preserving genetic diversity. To maintain the free-ranging horse and burro HMAs at the prescribed AMLs with the genetic diversity needed for long-term genetic health, continued monitoring and active management will be required.

MANAGEMENT ACTIONS TO ACHIEVE OPTIMAL GENETIC DIVERSITY

The goal of genetic management is to maintain as much as possible of the standing genetic diversity of a population and thereby provide the raw material needed to respond to environmental changes. Chapter 4 outlines a variety of techniques for controlling and reducing fertility in free-ranging horses and burros so that numbers can be kept at prescribed levels. Although dramatically limiting individual fertility will reduce a population's size, it will also reduce its genetic effective population size, and this will have effects on genetic diversity.

Many HMAs are spatially isolated, and others are contiguous. Some of the contiguous HMAs have been grouped into complexes by BLM (see Figure 1-2); this suggests that they are exchanging migrants and may be considered a single unit. Within each of the HMAs, BLM could accomplish the goal of conserving genetic diversity through intensive management, as has been done for the herds at Assateague Island and Shackleford Banks. Alternatively, BLM could consider the HMAs as a single population and use the principles of metapopulation management to guide its actions.

Effects of Fertility Control on Genetic Diversity

Changing the proportion of breeding males and females can have important effects on genetic diversity through reductions in effective population size. First, contracepting large

TABLE 5-3 Genetic Diversity in Free-Ranging Burros in Herd Management Areas Determined by Using Nine Microsatellite Loci

Herd Management Area	State	N	Year Sampled	AML	H_o	H_c	F_{is}	MNA	Cothran Report Date—Comments
Alamo	AZ			160					
Big Sandy (Wikieup)	AZ	10	2004	139	0.490	0.510	0.038	3.667	10/30/08
Black Mountain (Kingman)	AZ	25	2004	478	0.551	0.553	0.003	4.111	10/30/08
Cibola-Trigo 2	AZ	28	2004	285	0.453	0.506	0.104	4.000	11/06/08
Havasut	AZ	19	2004	166	0.487	0.498	0.021	3.889	11/06/08
Lake Pleasant	AZ			208					
<i>Arizona mean value</i>									
Chemehuevi	CA	52	2003	121	0.354	0.427	0.171	3.222	07/15/03
Chocolate Mule	CA	55	2002	133	0.298	0.394	0.243	3.444	01/24/03
Lee Flats	CA	2	No year	15	0.278	0.278	0.000	1.778	E.G. Cothran, Texas A&M University, email communication, December 21, 2011
Twin Peaks	CA	39	2011	116	0.487	0.526	0.075	3.444	10/5/12
Waucoba-Hunter Mountain	CA			11					
<i>California mean value</i>									
Blue Wing	NV	28	2003	28	0.252	0.268	0.059	2.556	08/03/04
Bullfrog	NV	49	No year	91	0.492	0.502	0.199	3.889	E.G. Cothran, Texas A&M University, email communication, December 21, 2011
Gold Butte	NV			98					
Gold Mountain	NV			78					
Goldfield	NV			37					
Hickison Summit	NV			45					
Johannie	NV			108					
Lava Beds	NV			16					
Marietta Wild Burro Range	NV			104					

numbers of females in the population will increase variance in family size in that many more females than normal will fail to produce offspring. Because N_e is inversely proportional to variance in family size, any increase in the number of nonreproducing but surviving females will decrease effective population size. Second, any movement of the sex ratio of breeders from 1:1 will also decrease effective population size. That effect can be subtle in polygynous species, such as horses and burros, inasmuch as the number of breeding males is usually less than the number of breeding females. Thus, although reducing the number of breeding females through female contraception may move the ratio closer to 1:1, the reductions in total numbers of breeders and increases in the variance in family size may still lead to an overall reduction in N_e .

Alternatively, if population size is reduced by decreasing the number of males, it might not reduce N_e depending on the pool of bachelor males available to become harem stallions. If the pool is large, it will leave the number of breeders and variance in family size unaffected.

It is important to consider those effects in the planning phase of management actions. A modeling approach (see Chapter 6) will allow managers to consider the effects of population-size reduction by using fertility-control methods and other important factors.

Individual-Based Genetic Management

Maximum retention of genetic diversity in each HMA (or HMA complex) and in the population as a whole could be achieved if horses and burros were managed as individuals. That entails knowing all individuals in the population unit, their relationships, and their reproductive performance over time. The detailed population monitoring and record-keeping required to accomplish this has been possible in some barrier-island horse populations, including Assateague Island (Eggert et al., 2010) and Shackleford Banks. This level of management would entail an important departure from a truly wild population that is subject to natural selection, a distinction that would need to be made clear to all interested parties. It would also differentiate the management of free-ranging horses and burros from that of other species in the landscape, with the exception of cattle. The committee believes individual-based genetic management might be possible in some HMAs in which habitat conditions and local or BLM knowledge of individual animals make it possible to track individuals (for example, Pryor Mountains).

In addition to monitoring the genetics (via pedigree) and demographics of the population, individual-based genetic management would require actively controlling reproduction of individual animals so that they contribute to the gene pool equally and rare alleles or genotypes are not lost. The barrier islands of Assateague and Shackleford Banks provide some models of attempts to maximize genetic diversity in free-ranging animals through targeted contraception. Nuñez (2009) summarized the evolution of the contraceptive management programs on those islands. Software tools for keeping track of animal pedigrees, analyzing genetic relationships, and monitoring population demography were developed for captive populations of animals in zoos; their application to the Assateague Island population was described by Ballou et al. (2008) and Eggert et al. (2010). In HMAs in which known individual animals can be reliably contracepted, either temporarily or permanently, this type of genetic management is possible. In HMAs in which following individual animals and managing their individual reproductive performance is not feasible, a less labor-intensive approach to genetic management is possible with the use of translocations.

Translocation for Genetic Restoration

HMAAs exist in a mosaic of ecological habitats, anthropogenic effects, political jurisdictions, free-ranging horse and burro protection status, and property-ownership arrays. The likelihood of natural migration between HMAAs is affected by many factors. Two of the most important are the distance over which dispersing animals must travel to reach other HMAAs and the quality of the intervening habitat. Hampson et al. (2010) used GPS collars to study travel distances in two populations of free-ranging horses (12 horses) in Australia over 6-7 days at two sites that differed in vegetation and water abundance. There were no differences in daily travel distances between the two sites, but there was a wide range: 8.1-28.3 km. The mean daily travel distance was 15.9 km (18.2 km for males, 14.8 km for females). Some animals in the study were observed walking for 12 hours to reach water. Hampson et al. (2010) cited data from previous studies that showed travel distances of 17.9 km/day by free-ranging horses in Australia, 8.3 km/day by wild asses and 3.5 km/day by Przewalski's horses in Mongolia, and 15 km per 12 hours by female zebras.

Given the distances between many pairs of HMAAs, movement of horses and burros for genetic or demographic reasons would probably need to be facilitated by BLM. The practice of moving individual animals between populations for genetic restoration, or translocation, is justified scientifically. Perhaps the most famous case is that of the Florida panther (*Puma concolor coryi*). Details on the background of that population, the issues and decision-making processes involved in the genetic restoration, and the outcomes may be found in Hedrick (2001), Pimm et al. (2006), Johnson et al. (2010), and Benson et al. (2011). Briefly, this subspecies of puma was reduced to a population of about 25 in the early to mid-1990s and demonstrated lower genetic diversity than other North American puma populations (Culver et al., 2000) and a number of traits that suggested that the influences of inbreeding and genetic drift had completely or nearly fixed genes for potentially deleterious traits that were previously rare. Introduction of female Texas panthers (*Puma concolor stanleyana*) into the population in 1995 resulted in the production of offspring (Land and Lacy, 2000) that lacked several of the deleterious traits (Shindle et al., 2000; Hedrick, 2001; Johnson et al., 2010). Offspring, particularly females, had survival rates almost twice those previously observed in the population (Pimm et al., 2006; Benson et al., 2011), and increases in survival rates were correlated with increased heterozygosity (Benson et al., 2011). Despite these successes in population growth and apparent health, Johnson et al. (2010) pointed out that the future of the Florida panther will require continuing intensive management, including regular infusions of new genetic material, in the face of anthropogenic threats, habitat loss, infectious diseases, and continued inbreeding.

Other case studies of translocation providing genetic and demographic benefits include African lions (Trinkel et al., 2008), adders (Madsen et al., 1996, 1999, 2004), and prairie chickens (Westemeier et al., 1998). Studies by Vilà et al. (2003), Seddon et al. (2005), and Adams et al. (2011) described the favorable effect of a single natural immigrant into a wolf population. The case studies are supported by laboratory studies that have demonstrated genetic benefits, fitness benefits, or both of the infusion of new genetic material into small, inbred populations (e.g., Spielman and Frankham, 1992; Ebert et al., 2002; Saccheri and Brakefield, 2002).

Selection of Animals for Translocation

As early as the 1930s, it was established that inbreeding depression in small, isolated populations could lead to loss of fitness and increased risk of extinction (Wright, 1931).

Wright's analyses led him to conclude that even small amounts of gene flow between isolated small populations could offset the adverse effects of genetic drift and inbreeding. That conclusion gave rise to a large body of work aimed at determining exactly how much gene flow, in the form of immigrants per generation, was necessary to offset the adverse effects of genetic deterioration. A rule of thumb of one immigrant per generation emerged (Kimura and Ohta, 1971; Lewontin, 1974; Spieth, 1974) and has been widely adopted in conservation practice. More recently, that rule of thumb has been challenged on the basis of the simplistic assumptions that were used in deriving it (e.g., Mills and Allendorf, 1996; Vucetich and Waite, 2000). At the time this report was prepared, it seemed likely that in real-world applications, one immigrant per generation would be an absolute minimum. Mills and Allendorf (1996) outlined a number of scenarios in which the number of immigrants per generations should probably exceed one, including scenarios in which at least one of the following is the case:

- Inbreeding depression is believed to be occurring already.
- Immigrants are closely related to each other or to the receiving population.
- Effective population size is much lower than the number of animals present.
- Social, behavioral, ecological, or logistical factors prevent single animals from immigrating successfully.
- Immigrants are at a disadvantage in probability of survival and reproduction.
- The receiving population has been isolated for many generations.
- Extinction risk due to demographic or environmental variation is deemed to be very high unless there is aggressive supplementation.

The authors concluded that up to 10 immigrants per generation might be necessary to effect genetic restoration in those situations. Vucetich and Waite (2000) extended the analyses by modeling variation in population fluctuation and suggested that more than 20 immigrants per generation may be necessary if high population fluctuation leads to drastically reduced effective population size.

In addition to the number of animals to translocate, the interval for doing so must be determined. There are important practical and logistical considerations involved, but the translocation of animals for genetic restoration is usually thought of as being conducted on a per-generation basis. Therefore, one starting point is to determine the generation time of free-ranging horses. Eggert et al. (2010) constructed a pedigree for the Assateague Island horse population on the basis of molecular analyses and herd records and derived an estimate of 10 years. Goodloe et al. (1991) also derived an estimate of 10 years for horses on Cumberland Island, Georgia. Similarly, historical pedigree data on zoo populations of wild equids in North America all have generation time estimates of about 10 years (range 9.6 years in Somali wild ass to 10.4 years in Hartmann's zebra⁶). Thus, it would be valid to consider 10 years as an appropriate interval for translocating animals between populations for genetic restoration. On the basis of the literature, it appears that translocation of 10 animals between populations every 10 years would be appropriate.

BLM is already experienced in the capture and transport of animals for population management, and the protocols for translocation would be similar to those currently used for gathers; only the destination of the removed animals would differ. Although the movement of animals among HMAs has the potential to facilitate the spread of pathogens (Champagnon et al., 2012), the probability of that could be minimized through observation

⁶Association of Zoos and Aquariums website, www.aza.org. Accessed April 16, 2012.

and advance testing of source and target herds. Below is an outline of some factors to consider in selecting animals for translocation for genetic management.

Genetic Factors. Because the goal of translocation is to supplement the genetic diversity in a herd and reduce the probability of inbreeding, it is advisable to select animals that are unrelated to the target herd. In most cases, pedigree information on free-ranging horse and burro populations will not be available, so absolute genetic relationships among individual animals will be unknown. The use of genetic information, however, will make it possible to choose individual animals that have moderate levels of differentiation from the target population.

The term *outbreeding depression* is used to describe a decrease in fitness due to hybridization between individuals from populations that have differentially adapted genomes (Frankham et al., 2011). Frankham et al. (2011) used empirical data and modeling to develop a decision tree for predicting the probability of outbreeding depression. Their tree proved robust when crosses that had known outcomes were used, and it suggested that outbreeding depression is likely when the populations being crossed are of different species, exhibit fixed chromosomal variants, have not exchanged genes in 500 years, or inhabit different environments. None of those risk factors seems to apply to free-ranging horses and burros in HMAs. Environments may differ between HMAs, but Frankham et al. (2011) suggested that environmental differences need to be substantial enough to select for different traits among populations. They recommended paying particular attention to the needs and resources to which a species is most sensitive and to the range of variation in important features of the environments under consideration. The adaptability of the horse and its associated ability to live in various environments appears to lessen the concern about environmental differences between possible translocation sites.

By using the genetic data generated for the evaluation of level of genetic diversity, it is possible to estimate the level of differentiation among HMAs. The fixation index (F_{st}) is a measure of genetic distance, or population differentiation, that is based on genetic polymorphisms (Wright, 1931). Polymorphic microsatellite loci constitute a powerful tool for predicting which populations are so similar (low F_{st} value) that translocating animals will probably not be successful in supplementing genetic diversity and which are so different (high F_{st} value) that genetic compatibility between individuals may not be optimal and may reduce the probability of successful translocation. Matrices of pair-wise F_{st} values for horses and burros based on genetic data from BLM herds are in Appendix F and could be used to identify the mixtures that might be most successful because they exhibit moderate F_{st} values.

New genetic variation needed by an HMA does not necessarily need to come from another HMA. Mares in long-term holding facilities could also be used as sources of genetic diversity if necessary, assuming that they present no novel disease risk for free-ranging horses and burros. The genetic tools described above can be used to identify free-ranging horses and burros on other public lands, in private sanctuaries, and in long-term holding facilities that could be used to infuse new genetic variation into an HMA.

Behavior and Social Factors. Given the harem social structure of free-ranging horses and the fact that this structure means that more sexually mature females than sexually mature males are breeding at any one time, it appears that the most rapid way to infuse new genetic material into an HMA via translocation would be to move young, sexually mature mares between HMAs. Young mares new to an HMA are likely to be courted by bachelor males and to be open to forming consortships with them. Older mares would also probably be bred relatively quickly, but they may be more selective in forming consortships with

bachelor males. Ideally, translocated mares would already be familiar with one another, if possible originating from the same harem. Kaseda et al. (1995) found that mares that had long-term bonds to harem stallions had higher reproductive success than mares that wandered between bands regularly or that had shorter bonds to stallions. Linklater et al. (1999) also found that single mares that were dispersing between bands had lower fecundity, reproductive success, and body condition; had higher parasite levels; and received more aggression from bachelor males than mares in established harems. Moving established groups of females may buffer some of those adverse effects, but it is possible that translocating bonded females without a harem stallion will lead to dissolution of bonds between mares (Rubenstein, 1994).

A second option and one that might further lessen adverse effects is to move intact harems if the harem members and associated stallions can be reliably identified during gathers. That would immediately add new genetic material to the site, but there would be a longer delay in getting that material into the gene pool because foals born into the harem would have to grow up, disperse, and interbreed with members of the resident population.

A third option would be to move bachelor males. This option carries the most risk with respect to getting new genes into the resident population. Stallions that have harems may be quite successful in spreading their genes rapidly via breeding with multiple mares, but obtaining a harem is not easy, and bachelor males may not survive to realize breeding opportunities.

Immediate and long-term infusion of new genetic material may be most likely if intact harems or groups of young mares (immediate) are translocated with a number of males (long term).

Burros are characterized by a less cohesive social structure in which the only long-term relationships are between females and their dependent offspring. Thus, there would be fewer challenges in integrating new females into a burro population, so females would be the first choice for translocation of animals for genetic restoration of burro populations. Males would also be viable candidates for genetic restoration, but introduced males would have to compete with resident males for access to breeding females.

Fertility Control and Implications for Translocation

Introductions of males or females are likely to have different consequences in that adding new females will increase numbers exponentially over time. If population regulation involves female contraception, adding new fertile females could be counterproductive, so adding novel males may be the best way to increase genetic diversity without increasing population size. However, to ensure that the new males become breeders, either a large number would need to be translocated or some of the resident males would need to have their fertility reduced. Alternatively, if curtailing male fertility is the preferred means of population regulation, either a smaller number of novel males can be added to replace a disproportionate number of resident males that are made sterile, or novel females can be added inasmuch as whenever one of the few remaining resident males breeds, he will sire offspring that have genes from the novel females.

Which type of translocation is best to use will depend on a variety of factors, many of which can be tested with a modeling approach in the planning phase (see Chapter 6). Population size, fertility-control methods, and the effects of translocation on N_e will need to be considered. Although translocating males may require fewer total introductions when population size is being regulated because male additions increase the population growth arithmetically rather than exponentially, novel males may find it difficult to obtain harems

(horses) or territories (burros), which are prerequisites for siring many offspring. Many tradeoffs will require sensitivity to context in designing effective translocation strategies that enhance genetic diversity without upsetting existing population regulatory strategies.

CONCLUSIONS

Genetic diversity is an important component of the health of free-ranging horses and burros on HMAs, in that it provides the raw material needed to respond to environmental changes. Maintenance of genetic diversity is a function of the effective population size (N_e), which is probably at least an order of magnitude lower than the number of animals present. Factors that reduce N_e include unequal sex ratios, variance in family sizes, and high variance in population sizes between generations. In small, isolated herds, inbreeding is inevitable and will occur within only a few generations. It is important to measure and monitor allelic diversity, observed and expected heterozygosity (H_o and H_e), and coefficients of inbreeding (F_{is}) in HMAs to detect the loss of diversity before the reduction in fitness that has been observed in many inbred populations becomes a problem.

In recognition of the importance of monitoring genetic diversity, and as recommended in previous National Research Council reports, BLM has collaborated with outside scientists since 1985 to monitor herd-specific diversity on the basis first of isozyme and serum proteins and later of nuclear microsatellite loci. The committee recommends that BLM continue to monitor genetic diversity as part of the routine management of both horse and burro HMAs. The BLM *Wild Horses and Burros Management Handbook* does not clearly state which HMAs should be monitored and how often studies should be repeated. The committee recommends routine monitoring at all gathers and collection and analysis of a sufficient number of samples to detect losses of diversity.

Genetic concerns involve both the potential for the reduced fitness associated with inbreeding and the effects of mutations that can cause phenotypic conditions that affect the fitness of a herd. The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding, but they do not provide information about the effects of specific genes known to cause genetically based conditions. To the committee's knowledge, no tests have been conducted to detect the presence of genetic mutations associated with those types of conditions. The committee recommends that BLM document the incidence of coat color or other morphological anomalies that may indicate the presence of deleterious mutations during all gathers. For herds in which phenotypic data suggest the presence of genetically based disorders, the committee recommends testing and consultation with geneticists and equine veterinarians to devise appropriate management actions.

Monitoring of genetic diversity in burro HMAs has been conducted in only one herd since 2005. Genetic diversity in burro herds is lower than that in Spanish and Sicilian breeds, including endangered breeds, and many of the AML numbers are low to very low. The committee recommends that BLM resume the genetic monitoring of burro HMAs. Although the available literature does not report clinical issues in burros, the committee recommends that BLM routinely monitor and record the incidence of any morphological anomalies that may indicate the deleterious effects of inbreeding.

The committee recognizes that genetic management of some HMAs is complicated by other considerations. For herds that have strong associations with Spanish bloodlines—such as those of the Cerbat Mountain, AZ; Pryor Mountains, MT; and Sulphur, UT—or herds that contain unique morphological traits—such as the Kiger, OR, herd—BLM will need to balance concerns about maintaining breed ancestry with the need to maintain optimal genetic diversity. Herds that remain isolated over the long term will inevitably

lose genetic diversity inasmuch as maintaining or slightly increasing herd sizes will not offset the effects of genetic drift. The public is interested in these herds, and it is particularly important that BLM seek opportunities to discuss the complexity of the situation with interested parties. It is true that the existence of a few genetic markers may indicate Spanish origin, but the remainder of the genome may not; rather, it may reflect horses that are well adapted to local conditions. If the latter is the case, isolation of the herd to maintain purity may be mistaken and may lead to unnecessary loss of genetic diversity. The committee recommends that BLM examine in more depth the genetic constitution of these herds and share the findings with the public so that informed decisions about the sustainability of the populations can be made (see Chapter 8).

The committee recommends that BLM consider some groups of HMAs to constitute a single population and manage them by using natural or assisted migration (translocation) whenever necessary to maintain or supplement genetic diversity. Although there is no magic number above which a population can be considered forever viable, studies suggest that thousands of animals will be needed for long-term viability and maintenance of genetic diversity. Very few of the HMAs are large enough to be buffered against the effects of genetic drift, and herd sizes must be maintained at prescribed AMLs, so managing the HMAs as a metapopulation will reduce the rate of reduction of genetic diversity in the long term.

Finally, the committee recommends that BLM stay abreast of advances in population genetics and genomics. New laboratory and data-analysis tools promise to reduce costs while providing more powerful methods for monitoring genetic diversity and resolving breed relationships. The 12 nuclear microsatellite loci that are currently used for estimating genetic diversity and genetic differentiation among herds were chosen largely from those approved by the International Society of Animal Genetics for their informativeness in equine genotyping. Thus, they are useful tools for estimating overall genetic diversity and population divergence. However, the small number of loci and the uncertainty about their evolution limit their power to resolve relationships among closely related lineages, such as equid breeds. Recently, the Illumina 50K SNP Beadchip, an equine SNP genotyping array with over 50,000 polymorphic loci, was developed and found to be informative in several equid species (McCue et al., 2012). The Equine Genetic Diversity Consortium successfully used that array to assess the effects of inbreeding and natural selection in 36 breeds from around the world, to infer relationships among breeds, and to detect signals of ancestral admixture (Petersen et al., 2012a). Genomic tools are also being used to detect the genetic underpinnings of traits that are under positive natural selection (Petersen et al., 2012b) and mutations that are responsible for genetically based diseases, such as lavender foal syndrome (Brooks et al., 2010). Genomic analysis can provide much finer resolution of questions about breed associations and will soon be the method of choice for population-level analysis.

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6

Population Models and Evaluation of Models

The Bureau of Land Management (BLM) *Wild Horses and Burros Management Handbook* states that the WinEquus model,¹ developed by Stephen Jenkins at the University of Nevada, Reno, “will be used during gather or herd management area planning to analyze and compare the effects of proposed wild horse management” and “to identify whether any of the alternatives would be likely to ‘crash’ the population based on a number of stochastic factors (varying environmental conditions)” (BLM, 2010a, p. 28). This chapter briefly reviews the purpose and utility of modeling population dynamics and the kinds of models that have been applied to free-ranging horse and burro populations. It then examines models that have been developed specifically for the BLM Wild Horse and Burro Program. After reviewing their strengths and weaknesses, the chapter concludes with an overview of alternative modeling approaches that can be useful for managing the free-ranging equid populations on the western rangelands.

UTILITY OF POPULATION MODELS

Models of population dynamics (hereafter, referred to as population models) are useful tools for understanding, explaining, and predicting the dynamics and persistence of biological populations. From a management perspective, such models can be used for assessing the status of a population, diagnosing causes of population declines or explosive growth, prescribing management targets, and evaluating the prognosis of a population’s likely responses to alternative management actions (Caswell, 2001). For example, population modeling played an important role in reversing the decline of the endangered loggerhead sea turtle population in the United States (Crouse et al., 1987; Crowder et al., 1994; Caswell, 2001). Until the 1980s, sea turtle conservation efforts had focused on the protection of nests, eggs, and hatchlings on nesting beaches. Analysis of stage-structured population models revealed that the sea turtle population growth rate was proportionately most

¹The WinEquus is available online at <http://wolfweb.unr.edu/homepage/jenkins/>.

sensitive to changes in survival and that reducing mortality of subadult and adult turtles at sea would be a more efficient way of increasing population growth rate than protecting nests and hatchlings on nesting beaches. Informed in part by those findings, regulations were imposed to require turtle excluder devices (TEDs) in shrimp trawls in the sea turtle range. Although controversial initially, the use of TEDs was later endorsed by a National Research Council committee (NRC, 1990) and is thought to have had a substantial favorable effect on loggerhead sea turtle populations (Caswell, 2001).

Models of population dynamics can also help to predict populations' responses to environmental changes, such as global climate change. Global climate change is predicted to influence arctic sea ice adversely, and this could affect the population dynamics and persistence of species that depend on sea ice environments. For example, polar bears depend on arctic sea ice for feeding and breeding. By integrating field data, climate-change models, and population models, Hunter et al. (2010) predicted that the polar bear population in the southern Beaufort Sea would experience a drastic decline because of a reduction in sea ice extent by the end of the 21st century.

Population models are also useful tools in the management of overabundant species. For example, the American bullfrog is an introduced species on Vancouver Island and is adversely affecting biodiversity on parts of the island. A modeling study by Govindarajulu et al. (2005) reported that the management strategy of targeting removal of tadpoles may not be effective because partial removal of tadpoles could lead to higher tadpole survival owing to reduced density-dependent effects. Their results revealed that culling metamorphs in fall would be most effective in controlling bullfrog populations. A theoretical study by Zipkin et al. (2009) suggested that control of overabundant species by harvest (or removal) could backfire because populations of species characterized by early maturity and high fecundity may experience rapid growth after harvest or removal as a result of density-dependent overcompensation. Other examples of the application of population models include assessing the influences of culling and fertility control on the population dynamics of an overabundant elk population (Bradford and Hobbs, 2008) and controlling the fertility of the koala on koala-forest dynamics (Todd et al., 2008), evaluating the efficacy of euthanasia versus trap-neuter-return for management of free-roaming cats (Andersen et al., 2004) and the efficacy of fertility control in a white-tailed deer population (Merrill et al., 2003), discerning mechanisms underlying a recent rapid population growth in yellow-bellied marmots (Ozgul et al., 2010), predicting effects of El Niño on the dynamics and persistence of the Galapagos penguin population (Vargas et al., 2007), assessing harvest impact on the persistence of dugongs (Heinsohn et al., 2004), and projecting the impact of anticipated climate change on the dynamics and persistence of emperor penguin populations (Jenouvrier et al., 2009).

POPULATION MODELS APPLIED TO HORSES AND BURROS

Population models have been applied to free-ranging horse populations to address a variety of ecological and management questions. The modeling frameworks used have ranged from simple, unstructured models to complex spatially explicit, individual-based simulation models. In the United States, Garrott and Taylor (1990) were among the first to report estimates of age-specific survival, reproductive rates, and population growth rates in a free-ranging horse population. Since then, several population-modeling studies have been conducted, including those by Garrott et al. (1991, 1992), Garrott and Siniff (1992), Coughenour (1999, 2000, 2002), Gross (2000), Ballou et al. (2008), and Bartholow (2007). Outside the United States, population dynamics in free-ranging or semi-free-ranging horse

populations have been studied and modeled in Australia (Walter, 2002; Dawson, 2005; Dawson and Hone, 2012), Argentina (Scorolli and Lopez Cazorla, 2010), New Zealand (Linklater et al., 2004), and France (Grange et al., 2009). Relatively few studies have examined demography and population dynamics of free-ranging asses or free-ranging burros either inside or outside the United States (Freeland and Choquenot, 1990; Choquenot, 1991; Saltz and Rubenstein, 1995; Saltz et al., 2006).

From a management perspective, free-ranging horse population-modeling efforts have focused on management strategies to reduce population size and growth rate (Garrott and Siniff, 1992; Garrott et al., 1992; Gross 2000). The primary foci have been to determine the number (or proportion), sex, and age of animals to be removed or made infertile to achieve a target population size or growth rate and to determine the frequency of removal or fertility-control treatments necessary to achieve management objectives.

Motivated by a controversy regarding the sex of animals to be targeted for fertility control, Garrott and Siniff (1992) conducted a simulation study to determine the population effects of male-directed fertility control in free-ranging horses. They concluded that male-oriented contraception would result in only modest reductions in population growth rate and potentially would disrupt seasonal foaling patterns. In one of the first and most comprehensive modeling efforts, Garrott et al. (1992) used an age-structured population model and evaluated population effects and costs associated with five management alternatives: selective removal, nonselective removal, and three different fertility-control treatments. Their results revealed pros and cons of each management alternative but suggested that a female-directed fertility-control program can reduce the number of horses that need to be removed to keep the horse numbers within an acceptable range and can reduce associated costs of management activities.

Gross (2000) developed an individual-based model to simulate free-ranging horse population dynamics and genetic diversity and to evaluate the efficacy of alternative management strategies. The model operated on a yearly time step,² followed each animal from birth to death, and was parameterized with (that is, based on) demographic data from the Pryor Mountain herd. Sex, age, reproductive status, and genetic constitution of each animal were explicitly considered, and such processes as breeding, recruitment, contraception, and removal were simulated. Genetic diversity was modeled by simulating Mendelian inheritance at 10 independent loci. Management strategies implemented included removals, contraceptive treatments, or both. Management strategies were “simulated by applying rules based on current population size, post-treatment population objective, sex and age of animals to be treated, the minimum number of horses in each sex/age class that were to be unaffected by the treatment, and for removals, the length of time since a previous removal” (Gross, 2000, p. 321). Model output included the number of animals by sex and age classes, the age and sex of animals removed, the age of animals given contraceptive treatment, and measures of genetic diversity for each year of simulation. Gross concluded that management strategies based on removal and fertility control were most effective in achieving management goals but advocated strategies that rely less on removal and more on fertility control; he also highlighted the importance of management actions to delay age at first reproduction and increase generation length to reduce population growth. The model was somewhat unique in that it tracked individual animals throughout their lives and simulated breeding and genetic diversity.

²In simulation models, the model user projects population size (or some other variable of interest) from one time “step” to the next, for example, from year 1 to year 2 and then from year 2 to year 3 and so on. The length of the time step (e.g., day, month, or year) is specified by the model user.

Coughenour (1999, 2000) used a spatially explicit ecosystem model to simulate the ecosystem dynamics in the Pryor Mountains, of which free-ranging horses were a component. Coughenour's model (SAVANNA; Coughenour, 1993) operated on weekly time steps and was driven by monthly weather data. The model simulated net primary productivity, litter decomposition and nitrogen cycling, animal forage intake and energy balance, and population dynamics of free-ranging horses and sympatric bighorn sheep. Horse populations were represented as age-sex classes, and birth and death rates were allowed to be affected by horse nutritional status, which in turn was affected by forage availability. The model was run to simulate a variety of management alternatives, including density-dependent self-regulation, that is, food-limited carrying capacity (see Chapter 3). Coughenour concluded that without culling horses have the capacity to increase to higher densities and can persist at quasisubequilibrium with available forage, although vegetation cover would be reduced in many areas and horses would generally be in poorer condition and exhibit higher mortality (see Chapter 3). The model was unique in that it was process-oriented and explicitly linked free-ranging horse population dynamics with climate, vegetation, and ecosystem processes.

More recently, Bartholow (2007) used WinEquus (reviewed below) to simulate costs and demographic effects of removal and contraception in four horse populations managed by BLM: Challis, Little Book Cliffs, McCullough Peaks, and Pryor Mountains. Alternative scenarios simulated included status quo of selective removal, adoption, and sanctuary; changing the frequency and efficiency of roundups; and status quo plus a variety of contraceptive applications. Bartholow (2007) concluded that prudent use of contraceptives could lead to reductions in costs of management activities of up to 30 percent.

Ballou et al. (2008) used the program VORTEX³ (Miller and Lacy, 2005) to simulate population-dynamic and genetic effects of alternative management scenarios for horses on Assateague Island (managed by the National Park Service). Specifically, they examined the rate of population decline, the time to reach the management target, and the level of inbreeding under the existing contraceptive strategy and under an adaptive contraceptive strategy. They concluded that the continued use of the current fertility-control strategy would further reduce the population growth rate, cause a major shift in age structure in favor of older animals, and lead to a low percentage of females that have reproductive opportunities.

VORTEX was not developed specifically for horses, but it has many features that could be useful for modeling free-ranging horse population dynamics. It is an individual-based simulation model that allows users to evaluate potential effects of deterministic forces (e.g., density dependence) and stochastic forces (e.g., demographic and environmental stochasticity and catastrophes) on the dynamics and persistence of age-structured wildlife populations (Lacy, 2000; Miller and Lacy, 2005). The program allows users to create and analyze alternative management scenarios easily. The program has been in existence for many years, is fully and adequately documented, offers an easy-to-use graphical user interface, and has been one of the most popular population-viability analysis software packages (see Miller and Lacy [2005] for a bibliography of publications that use VORTEX).

Age-structured or stage-structured matrix population models (Caswell, 2001) have often been used to explore questions relevant to free-ranging horse management. For example, Hobbs et al. (2000) used a female-only, density-dependent, stage-structured matrix model for theoretical exploration of questions pertaining to the effects of culling and fertility control on ungulate population dynamics. Only recruitment was assumed to be

³VORTEX is available online at <http://www.vortex9.org/vortex.html>.

density-dependent. The effect of fertility control was modeled by partitioning females of reproductive age into fertile and infertile categories, and removal was modeled by including a removal term that was a function of per capita removal rate. Zhang (2000) also used a density-dependent matrix model for theoretical analysis of the efficacy of fertility control and culling for wildlife population control. Similar population-modeling frameworks have been used to evaluate the effect of fertility control on overabundant white-tailed deer populations in the United States (Merrill et al., 2003) and to simulate koala-forest dynamics in Australia (Todd et al., 2008). Although generally flexible, powerful, and amenable to theoretical explorations (Caswell, 2001), matrix models do not permit explicit consideration of such factors as allelic diversity, mating system, individual variation, and behavioral interactions, which can affect free-ranging horse population dynamics.

POPULATION-MODELING FRAMEWORK USED BY THE BUREAU OF LAND MANAGEMENT

The committee was asked to evaluate the strengths and limitations of the population model used by BLM and the types of decisions that could be appropriately supported by the model. As mentioned previously, when the report was prepared, BLM used the population simulation model WinEquus.

WinEquus uses an individual-based approach—that is, each animal is tracked individually as opposed to the use of aggregated age-sex or stage classes—to simulate population dynamics and management of free-ranging horses in the framework of age-structured and sex-structured population models. Given appropriate data, it can incorporate the effects of environmental and demographic stochasticities, density dependence, and management actions and can simulate population dynamics for up to 20 years (Jenkins, 2011).

The basic data requirements include initial age and sex distributions, sex-specific and age-specific survival probabilities, age-specific foaling rates, and parameter values needed to implement density dependence, environmental stochasticity, and, if desired, management options (removal, contraception of females, or both). By default, WinEquus assumes a detection (or sighting) probability of 90 percent for typical BLM inventory surveys and increases the number of horses counted in each age-sex class accordingly. The assumption of 90-percent detection probability originated in a paper published by Garrott et al. (1991) that draws from a small sample of western herds with adequate data and likely represents an optimistic estimate of the typical proportion of horses detected in routine surveys (see Chapter 2). However, the user can disable that option in such a way that initial age and sex distributions are treated as exact and no adjustments for detection probability are made. Environmental stochasticity is incorporated by sampling survival and foaling rates from the logistic distribution with user-specified parameter values. However, there are no specific linkages among parameters of logistic distribution, climatic variability (e.g., variability in rainfall and winter severity), and vital rates (e.g., birth and death rates). Survival of both foals and adults is assumed to be perfectly correlated by default; however, the user can specify any correlation from -1 to $+1$ between survival and foaling rates if desired. Because the program uses an individual-based simulation approach, the effect of demographic stochasticity (random variation among individuals in survival and foaling rates) is automatically incorporated. By default, density dependence is not considered; however, the user may choose for foal-survival probability to be density-dependent, in which case WinEquus adjusts foal-survival probability as a nonlinear function of population density in such a way that the finite population growth rate is 1.0 (births equal deaths) when population density reaches the carrying capacity (Jenkins, 2011). Management scenarios offered by

the program include no management, removal only, female fertility control only, and both removal and female fertility control.

The user can specify various parameter values relevant to the selected management alternatives, including a gather schedule, target population size, population size above which removal is implemented, percentage of animals of different sex and age classes to be removed, effectiveness of fertility control over time, and percentage of mares of different ages to be treated with fertility-control agents. The program output includes time series and summaries of population size, information regarding the age and sex composition of the simulated population trajectories, and information on annual population growth rates. The output also includes summary information on results of management such as number of gathers, number of horses removed, and number of mares treated with fertility-control agents; this information can be used to assess the economic costs of management alternatives although the current version of the program does not offer options for calculating economic costs.

The committee evaluated WinEquus and concluded that it does what the author claims that it can do. It offers an easy-to-use user interface, provides default parameter values (age-specific foaling rates, age-specific and sex-specific survival rates, and sex and age composition), and allows users to choose management options to be simulated. A user manual was not available for the current version (Version 1.40) of the program, but the help files offer useful guidance. Results can be saved as text files for further analyses or viewed on a computer monitor. Under the assumptions of the model and given appropriate data, WinEquus can adequately simulate horse population dynamics under alternative management actions (no treatment, removal, female fertility control, and both removal and female fertility control). The committee found one peer-reviewed journal article that used WinEquus for modeling free-ranging horse population dynamics under alternative management scenarios (Bartholow, 2007).

How the Bureau of Land Management Uses WinEquus

As noted previously, the BLM handbook calls for the use of the WinEquus population model for Herd Management Area (HMA) planning that involves management interventions. Guidelines for the use of WinEquus have been developed and summarized by BLM for the Wild Horse and Burro Program staff in a document titled "How to Use and Interpret the WinEquus Population Modeling Program" (BLM, email communication, February 17, 2012). The document offers step-by-step instructions for specifying parameters and alternative management scenarios, running the model, and viewing or saving results.

The committee reviewed gather plans and environmental assessments of proposed management actions related to a sample of about 10 HMAs or HMA complexes and requested additional information from BLM administrators to aid in interpretation of information presented in the documents to evaluate how BLM uses WinEquus (see Appendix D). As stated variously in gather plans and environmental assessments, population modeling using WinEquus appeared to have two objectives: to evaluate potential population effects of alternative management actions and to determine whether any of the alternatives would crash the population or cause extremely low population numbers or growth rates. At least one gather plan (BLM, 2010b) reported that one of the objectives of population modeling was to assess the effects of different management alternatives on the genetic health of the herd, but WinEquus has no capability for simulating genetic diversity, so it cannot be used to address issues related to genetic health.

Presentations of WinEquus results in the HMA gather plans and environmental assessments examined by the committee normally included a brief narrative in the body of the

document and further details and graphic presentations of simulations in an appendix. Notably absent from most of the presentations was adequate information on the input parameter values used and the modeling options. Results of population simulations with WinEquus depend heavily on a large number of decisions that must be made by the user when setting up a simulation. As previously described, the decisions include data on or assumptions about animal abundance, sex and age structure, survival and foaling rates, parameters needed to model environmental stochasticity, and parameters associated with density dependence if it is incorporated into a simulation. In addition to model parameters that establish attributes of the population and the demographic processes to be simulated, the user must provide parameter values for management alternatives, which may include efficacy of fertility treatment, percentage of mares of different ages to be treated, percentage of horses to be removed by sex and age, and removal schedule. There are a large number of combinations of the input parameter values that, in turn, dictate model output. Default parameter values (estimated using data collected from the Garfield Flat, Granite Range, and Pryor Mountain HMAs) and options available in the program can be used; however, it was often not stated whether or which set of default parameter values were used. Results of WinEquus simulations cannot be adequately interpreted without knowledge of input parameters and the many decisions made by the user in setting up the simulations.

Despite the importance of describing clearly and explicitly how WinEquus simulations were structured and the input parameter values used for each modeling exercise, there appeared to be no standardization of the amount of information presented in gather plans and environmental assessment documents. Many planning documents provided vague descriptions of input parameter values. For example, the Black Mountain gather plan stated that “data used in the statistical analysis of the Black Mountain and Hardtrigger HMAs was extrapolated from the census, and age and sex structure of the November 2010 CTR [capture, treat, release] gather” (BLM, 2012a, p. 79). Without further information, it is impossible to know how the data referred to in that statement were used to parameterize the WinEquus model or the actual values of any input parameters that might have been derived from the data. An exception in that respect was the High Rock Complex gather plan (BLM, 2011a), which provided a fair amount of relevant detail regarding input parameter values (with appropriate citations) and WinEquus options used. It specifically stated that demographic parameters for the Granite Range herd (a default option) were used, provided values of contraception and removal parameters, and stated that age and sex composition based on data from the High Rock HMA collected during 2006 were used in the results reported. However, many BLM planning documents reviewed by the committee, such as the Cold Spring HMA gather plan (BLM, 2010c), failed to provide any information regarding input parameter values or WinEquus options.

The lack of relevant information regarding input or management parameters in gather plans or environmental assessments has attracted public attention. For example, multiple public comments were related to some aspects of input parameters or modeling options for the Twin Peak HMA gather plan (BLM, 2010d). In response to one such comment, BLM stated that “the model and parameters therein were developed by Stephen H. Jenkins of the Department of Biology, University of Nevada at Reno. Reference: Wild Horse Population Model, Version 3.2 User’s Guide, Stephen H. Jenkins, University of Nevada, 1996” (BLM, 2010e, p. 24). That response is vague and uninformative but seems to imply that the simulations relied on one of the default parameter options available in WinEquus. Although it was rarely stated explicitly in planning documents, the committee concluded that one of the default age-specific survival and foaling rate datasets (Granite Peak, Garfield Flat, and Pryor Mountain HMAs) is typically used for WinEquus simulations. It was unclear whether

or to what extent the chosen (default) datasets were representative of a specific HMA or HMA complex because no information that addressed this issue is typically provided in planning documents. In response to the committee's queries, BLM noted that default parameter values were used because HMA-specific data were not available, and it offered lack of funding to collect HMA-specific data as justification. The committee recognized that limitation, but nearly all HMAs or HMA complexes are periodically gathered and substantial numbers of horses removed, sexed, aged, and placed into holding facilities. Those data, with sex- and age-composition data obtained in previous gathers and estimates of abundance from periodic population surveys (see Chapter 2), can provide some site-specific data that can be used in assigning values to parameters in WinEquus, and it is the committee's impression that this information may have been used in most WinEquus simulations. However, that is an assumption; it was not explicitly stated in most gather plans or environmental assessments.

Results of population modeling reported in gather plans or environmental assessments varied substantially, but they generally included graphic or numerical summaries of typical population trajectories, of statistics on population size at the end of the simulation period (usually 11 years), of descriptions of the realized population growth rate during the simulation period, and of the numbers of horses gathered, removed, and treated with a fertility-control agent under alternative management actions. Most gather plans and environmental assessments, however, simply copied and pasted WinEquus output and gave no explanation or interpretation of the results being reported. Although management options recommended or implemented appeared to be generally consistent with results of population modeling, most of the gather plans conveyed nothing about whether or how results of population modeling were used to make management decisions. In rare instances, how results of population modeling were used in management decisions was explicitly stated; for example, the Challis HMA gather plan specifically stated that the number, age, and sex of animals proposed for removal were based on the results of population modeling (BLM, 2012b).

The committee queried BLM to gain additional insight into how results of WinEquus simulations were used in management decisions to determine whether there was a general agency policy on the use of WinEquus results. One BLM field office responded that "[results of population modeling] were not used to make direct management decisions regarding age or sex of horses to return to the range as these decisions were made based on horses actually captured and commensurate with our selective removal criteria" (BLM, email communication, March 20, 2012). A similar question had been submitted to BLM officials by a member of the public during the public-comment period for the Twin Peak environmental assessment. It elicited the response that "these modeling prediction numbers are not used for making specific management decisions, however these numbers are useful in making relative comparisons of the different alternatives and of the potential outcomes under different management options" (BLM, 2010e, p. 34). Thus, whether or how results of WinEquus analyses were used in management decisions at the HMA or HMA-complex level is unclear because of the inconsistency in statements found in the planning documents reviewed by the committee.

The committee was also asked to determine the type of management decisions that can be appropriately supported by using WinEquus. Such a determination would require the committee knowing how BLM uses, or would like to use, WinEquus to make management decisions, specific questions to be addressed and management alternatives to be evaluated, and the availability of data needed to assign values to parameters in the model. As noted above, the committee could not determine with certitude whether or how BLM uses results of WinEquus population modeling in making management decisions. Specifically, it was

difficult to determine whether results of population modeling were used to make management decisions or were offered as justification for management decisions that were made independently of modeling results. Furthermore, in the absence of at least some site-specific (or otherwise representative) data and relevant information regarding input parameters and WinEquus options, results of population-modeling exercises would be difficult for a critical reader to accept as pertinent and meaningful. Nonetheless, given appropriate data, WinEquus can be used to simulate free-ranging horse population dynamics without management interventions or under alternative management regimes that are available in the program (removal only, female fertility control only, and both removal and female fertility control).

Strengths and Weaknesses of WinEquus

The committee understood that WinEquus was developed to fulfill BLM's need for easy-to-use software for simulating horse population dynamics and its need for management scenarios that can be used by its staff with minimal training. WinEquus appears to fulfill those needs. The easy-to-use graphical user interface makes it easy to enter baseline demographic data manually or to choose from default datasets available in the program. When a management option is selected, the program offers intuitive data-input windows for relevant parameters. Likewise, the program makes it relatively painless to input a scale parameter to implement environmental stochasticity on age-specific survival and foaling rates or to implement density-dependent effects on foal survival rate. Ease of use, the ability to simulate population effects of management options (female fertility control, removal, or both), and informative outputs were viewed as strengths of WinEquus. However, some modeling options that are not available in WinEquus would potentially be useful to BLM's Wild Horse and Burro Program (see section "Alternative Modeling Approaches" below).

THE WILD HORSE MANAGEMENT SYSTEM MODEL

The Humane Society of the United States (HSUS) has suggested to BLM that it use the Wild Horse Management System (WHMS) model as an alternative in the management of free-ranging horses and burros. The model was developed by EconFirst Associates, LLC, initially with HSUS's financial support. Charles W. de Seve, the company's president, gave two presentations to the committee (de Seve, 2011a, 2012) explaining how the model simulates free-ranging horse population dynamics, management actions, and associated costs.

According to de Seve (2011b), the WHMS is "a set of linked computer models to help control wild horse populations on the western rangelands managed by the Bureau of Land Management." The model is described as a "dynamic management tool useful to guide BLM's activities toward the dual objectives of humane population control and cost containment." It has four components:

- **Dynamic population simulation model:** This component is a stochastic population simulation model that projects age and sex composition annually for up to 12 years. A sub-model projects age and sex composition of horses in the holding facilities;
- **Economic costing model:** This component calculates annual costs of horse management on the range and in holding facilities;
- **Management intervention and optimization model:** This module is described as a supervisory module that controls parameter input, simulation runs, and reports results; and

- Population and range database system: The database structure includes “current and historical data by range on age-sex counts, gathers, removals, releases and fertility control.” It is argued that the database “is designed to improve the limited management data that are currently available” (de Seve, 2011b).

Economic costing and optimization options offered by the WHMS model could be useful to BLM. For example, the reverse-optimization technique in that model could be used to identify the most effective use of limited funds for managing horses given the simulated population dynamics of the horses, the effects of removals and contraception on horse population dynamics, and the economic costs of removals, contraception, and holding facilities. Other useful features of the model include the ability to model single or multiple HMAs and a built-in database-management system. It is claimed that the population dynamics submodel is the same as that used in WinEquus, but the committee could not verify that. The description of many aspects of the model provided in the handout and presentations was generally unclear or otherwise vague. The committee did not have access to the program or its user manual, so it could not objectively evaluate the WHMS model developed by EconFirst Associates, LLC, or verify the many claims made about its capabilities. The committee cautions that BLM should not adopt a complex model, such as the WHMS model, without a thorough evaluation of its program and appropriate documentation by independent experts.

ALTERNATIVE MODELING APPROACHES

The adequacy of a population model depends on a number of factors, including how (and for what purpose) BLM plans to use it, characteristics and processes that are considered important enough to be included, management alternatives that are to be simulated, and availability of data to assign to parameters. If BLM plans to use a population model for short-term population projection and to evaluate potential effects of the management alternatives (female fertility control, removal, or a combination of the two), WinEquus is probably sufficient to support current needs. However, BLM’s Wild Horse and Burro Program faces unique challenges, and population models are potentially valuable tools in devising and implementing both short-term and long-term management plans. Although the committee recognizes that a perfect model does not exist, it is instructive to consider features that would help BLM to meet its unique challenges.

Basic Features

At the basic level, a good population model would accurately reflect free-ranging horse or burro life-history, social structure, and mating system. It would also incorporate factors and processes that can affect population dynamics, including environmental and demographic variability or stochasticity, and density dependence. Climatic variability can substantially affect population growth through its effects on forage availability and subsequently, survival and reproduction. Explicit linkages between weather data and demographic vital rates would markedly increase the realism of simulated scenarios. Chapter 3 reveals that several vital demographic rates can be potentially influenced by increased competition for forage at high population densities, especially if the populations are allowed to increase to food-limited carrying capacity. Thus, options to allow those vital rates to be density-dependent, and perhaps the inclusion of alternative functional forms for density-dependent effects, might be useful. There are, however, surprisingly few studies of

mechanisms that generate density-dependent responses in free-ranging horse and burro populations, and data-based estimates of parameters that define relationships between population density, climatic variables, and demographic vital rates were not available at the time of the committee's study. Until such data on free-ranging horses and burros become available, incorporating the aforementioned features would necessitate extrapolating insights gained from detailed demographic studies of other species, and caution should be exercised when making such extrapolations.

The committee understands that fertility control may become a major tool for management of free-ranging horses. Whereas WinEquus allows simulation of female fertility control, male fertility control cannot be simulated with the current version of it. As described in Chapter 4, male fertility control, perhaps via such minimally invasive methods as chemical vasectomy, remains a viable management option. Fertility control that targets both males and females may be more effective in reducing population growth than a strategy that targets only one sex. In addition, fertility control can trigger unintended consequences such as increased survival and longevity, changes in ages at first and last reproduction, and alteration of populations' age structure (see Chapter 4). Many HMAs and HMA complexes hold fairly small numbers of horses, and Chapter 5 suggests that genetic diversity remains a concern. Maintenance of genetic diversity is especially important in the context of global climate change because further loss of genetic diversity may compromise free-ranging equids' ability to respond to global climate change evolutionarily. Thus, the capacity to model population effects of fertility control that targets both males and females (and the ensuing compensatory responses) and options that allow simulation of allelic diversity (e.g., Gross, 2000; Lacy, 2000) might prove useful for short-term population management and the long-term goal of maintaining genetic diversity and evolutionary potential.

The earth's climate is changing (IPCC, 2007). Most models of global climate change predict that the mean and variance of rainfall and temperature will be affected and that the frequency of extreme climatic events, such as severe drought, will increase. Thus, global climate change will undoubtedly affect free-ranging horses and burros because it will affect the arid environment that horses and burros inhabit (McLaughlin et al., 2002; Saltz et al., 2006; IPCC, 2007). Population models that would allow simulation of climate-change effects and catastrophic events (e.g., disease outbreaks) would be helpful in the long run.

Asymptotic and transient sensitivity analyses (sensitivity of asymptotic population growth rate, projected population size, or probability of extinction to vital demographic rates and other input parameters) are useful tools and have been used in setting priorities for research and making management decisions (Crowder et al., 1994; Caswell, 2001, 2005, 2007). WinEquus and other models developed for free-ranging horses do not offer options for sensitivity analysis. Options to perform transient and asymptotic sensitivity analyses would be helpful to BLM's Wild Horse and Burro Program.

A "Metapopulation" Perspective and Budgetary Considerations

BLM's Wild Horse and Burro Program manages free-ranging horse and burro populations on public rangelands, but it also manages captive populations of horses that have been removed from the rangelands. Horses and burros removed from public rangelands are processed in short-term holding facilities where a subset of animals are made available for adoption by the public and unadoptable horses are transferred to long-term holding facilities, where they are maintained indefinitely. Each of those populations has its own characteristic dynamics, and all three are linked inasmuch as BLM moves horses among the populations on the basis of management policies and actions, budgets, and

other considerations that influence maintenance of the captive horses and burros. A major dilemma for the Wild Horse and Burro Program over the last decade has been the rapid increase in the number of horses removed from public rangelands that cannot be placed into private ownership through the Adopt-a-Horse Program and must be maintained in long-term holding facilities.

WinEquus and most other models developed for free-ranging horses are focused on capturing the dynamics of individual free-ranging horse populations and the influence of removals and various contraceptive interventions to alter growth rates of free-ranging horse herds (Garrott, 1991; Garrott et al., 1991, 1992; Garrott and Siniff, 1992; Gross, 2000; Roelle et al., 2010). An alternative model structure that could complement those efforts would use a metapopulation type of model that captures the dynamics of the free-ranging, short-term holding, and long-term holding populations and the movement of horses among these three populations—in essence, a model that captures the dynamics of all horses managed by the Wild Horse and Burro Program. Such a model could

- Elucidate the basic processes operating in the Wild Horse and Burro Program and help to address BLM's current programmatic challenges.
- Project the changes in the numbers of horses maintained in short-term and long-term holding facilities and the budgets that would be required under current and potential future management alternatives.
- Include economic costing, and possibly cost-optimization and population-optimization, options.
- Project the longevity of horses in the long-term holding facilities to plan for the long-term budgetary requirements to maintain them.
- Project changes in the number of horses in each subpopulation and the entire metapopulation⁴ and budgets that would be required if best available contraceptive tools are more aggressively used to reduce the growth rates of free-ranging populations as outlined in the 2011 Wild Horse and Burro Program strategic plan (BLM, 2011b).
- Explore additional combinations of management actions that may help to meet the challenges of stabilizing the budget of the Wild Horse and Burro Program and to address the multiple goals of the program. If BLM finds that current management alternatives cannot meet program objectives within the budgetary constraints, it may be necessary to explore additional alternatives.

The WHMS model described above presumably has some of those capabilities and the capacity to calculate the economic costs incurred by keeping animals in holding facilities. However, the committee could not verify that because it did not have access to the WHMS software program.

An Ecosystem Modeling Approach

The population dynamics of free-ranging horses and burros are inextricably linked to ecosystem processes through their interactions with vegetation and other herbivore species, including livestock. Horse and burro populations respond to the quantity and quality of vegetation used as forage; their herbivory and trampling affects vegetation composition,

⁴A metapopulation is a collection of smaller subpopulations that are connected through movement of individual animals.

quantity, and quality. Vegetation dynamics are in turn linked to climate, hydrology, nutrient cycling, and decomposition of plant matter in the soil. Ultimately, equid population dynamics are driven by forage abundance and forage dynamics. Forage abundance affects forage intake, which affects animal body condition, which then affects survival and foaling rates. Survival and foaling rates affect horse and burro abundance, which affects forage abundance.

An ecosystem modeling approach (Coughenour, 1999, 2000, 2002; Weisberg et al., 2006) would capture these linkages between horse and burro population dynamics and ecosystem dynamics. It would go beyond the simple representations of fixed parameter values for survival and foaling rates, stochastic variation in the values of the parameters as represented in some models, or even correlative or regression-based linkages to climatic variables. Such a modeling framework would explicitly consider how or why horse and burro population sizes vary in response to forage, climate, and competition from other herbivore species over time and across the landscape.

Density-dependent population controls could be represented mechanistically. In contrast with the traditional approach of invoking a carrying-capacity term such as the “*K*” term in a logistic or theta-logistic population growth model (see section “Density-Dependent Factors” in Chapter 3), density dependence would be represented by simulating competition for forage among equids and other wildlife and livestock and the effects of forage limitation on body condition and the subsequent effects of body condition on population processes. As the herbivore population increases, available forage per animal decreases, average forage intake rate decreases in response to the decreased forage biomass, body condition begins to decline in response to decreased intake, survival and foaling rates decrease, and population growth slows.

Density-independent population controls could also be represented mechanistically. The primary source of density-independent controls is climatic controls on forage biomass. An ecosystem model therefore would represent plant-productivity responses to climate in a realistic fashion. A second major source of density-independent population fluctuations for horse and burro populations occupying higher elevations and more northerly latitudes is variation in winter severity, particularly snow cover (Berger, 1986; Garrott and Taylor, 1990). Snow cover affects forage availability and energetic costs of foraging for large herbivores because of the need for animals to displace snow while moving and foraging (Parker and Robbins, 1984; Parker et al., 1984). To simulate that effect, the model would have to simulate snow cover and its effect on forage intake rate. A third major source of density-independent population fluctuations for horses and burros occupying more southerly latitudes is variation in the availability of drinking water. Because such climatic variables as precipitation, temperature, snow cover, and water are not affected by population density of horses and burros, their effects on forage abundance and, later, on forage intake, body condition, survival, and foaling rates are density-independent.

Horses and burros are mobile and wide-ranging animals, capable of moving large distances daily. Consequently, they derive forage from landscapes that are spatially heterogeneous with respect to climate, soils, topography, water, and vegetation. It matters where horses and burros are on the landscape because forage biomass is spatially heterogeneous. If horses and burros have access to portions of the landscape that have increased forage, their forage intake will increase, with favorable effects on population dynamics as described above. Conversely, if they do not have access to forage areas because, for example, these areas are too far from a drinking-water source, there will be negative consequences for population growth. Thus, an ecosystem model would represent spatial variations in soil and climate and their effects on forage productivity. It would represent spatial variations

in densities of horses or burros as they select habitats that have suitable forage, topography, water, snow, and vegetation cover. It would also represent spatial variations in forage offtake, inasmuch as this affects the spatial distribution of forage. Forage, drinking water, snow, and animal distributions are, of course, temporally variable. Some parts of the landscape can function as “key resource areas” that provide critical forage and drinking water during times of drought when most of the rest of the landscape is devoid of these resources. Consequently, an ecosystem model would need to be spatially explicit (that is, it would represent the spatial distributions of forage, water, and equids on the landscape); it should also represent the seasonal and annual changes in climatic variables and the spatial distribution of horses or burros and key resources to predict equid population responses to variability in their environments accurately.

Spatially explicit ecosystem models are useful for a mechanistic understanding of critical linkages involved in climate-vegetation-consumer dynamics and to capture spatial heterogeneity at various levels of ecological organization adequately. Such models would also be required for exploring short-term and long-term effects of global climate change and can be used to simulate the effect of management actions. On the basis of the committee’s evaluation of how BLM uses population models, basic outputs provided by WinEquus appear to satisfy the agency’s needs. However, spatially explicit, process-driven ecosystem models would provide capabilities for assessing population responses to climate, spatial distributions of accessible forage and water, density dependence, and consequences for vegetation as described in Chapter 7.

CONCLUSIONS

The committee views population models as tools that can be useful but are never perfect. The usefulness of the information obtained from population modeling is directly related to the reliability of the data that are used to assign values to parameters in a model and depends on how adequately the model structure reflects the life-history of the study organisms and whether and to what extent deterministic and stochastic factors and management actions that affect the study population are considered. Models that capture free-ranging horse or burro life-history, genetics, social structure, and behaviors adequately or that simulate ecosystem processes are likely to be more complex and require more parameters than simpler models, but HMA managers are often constrained by a lack of that information. Consequently, it is difficult for the committee to recommend specific modeling frameworks.

A suitable modeling framework, or suite of models, would have to simulate life history; social behavior; mating system and genetics; forage limitation; use of forage, water, and space; and effects of alternative management actions throughout horse or burro life spans to meet the challenges outlined in the preceding paragraphs and to incorporate appropriately the factors and processes that influence free-ranging equid population dynamics. Possibly, different models could be used to address different aspects of the overall problem. As discussed previously, BLM’s current practice of using default datasets for population modeling is relatively uninformative and potentially misleading in that free-ranging horse and burro populations are distributed over a wide geographic area that encompasses varied climatic conditions and ecoregions, states of rangeland vigor, and herd management histories. All those factors almost certainly interact to influence demographic vital rates and other model parameters that would be needed to reflect horse or burro population dynamics in any HMA or HMA complex accurately. Efforts should be made to ensure that future modeling exercises use data from the target HMA or HMA complex or a sentinel population that closely resembles the target population being modeled.

The free-ranging horse and burro populations under BLM management are unusual in that they are composed of a multitude of HMAs or HMA complexes, horses and burros in short-term holding facilities, and horses in long-term holding facilities; animals are moved among the free-ranging population and short-term and long-term holding facilities. In addition, horses exhibit strong social organization, and age-sex composition is likely to be important in modeling the projected outcomes of management actions. BLM faces management constraints and must work within the 1971 Wild Free-Roaming Horses and Burros Act (P.L. 92-195 as amended), budgetary constraints, and other congressional or administrative restrictions, which leave the agency with few management options (primarily fertility control and removal). As summarized in Chapter 4, some fertility-control treatments are suitable only for males and others are suitable only for females. Furthermore, some fertility-control measures sterilize treated animals for life, whereas others are effective only for a limited period and have changing degrees of efficacy over time. To make the matter more complicated, both fertility control and removal (the two management options available to BLM at the time of the committee's review) can alter individual and population demographic attributes, social organization, behavior, and genetic diversity. As discussed in Chapter 5, loss of genetic variation remains a concern in connection with free-ranging horse and burro populations and cannot be ignored. In light of those complexities and budgetary constraints, population models could serve as helpful tools.

Although the committee appreciated BLM's efforts to use population models in its Wild Horse and Burro Program, it also identified several shortcomings. Those included a lack of transparency regarding how values were assigned to model parameters in WinEquus and what information was used to determine those values, how (or whether) results were used in management decisions, and failure to make full use of the available capabilities of WinEquus. When the same default datasets are used to model population dynamics of most or all HMAs or HMA complexes, results will necessarily be similar (give or take the effect of environmental stochasticity and initial age and sex structure). It is therefore not surprising that most gather plans and environmental assessments arrived at identical conclusions regarding the potential effects of the management alternatives considered.

It may not be possible to collect site-specific demographic data because of budgetary constraints, but such site-specific data may not be necessary. Detailed study and monitoring of free-ranging horse populations in a few HMAs that are representative of the HMAs or HMA complexes in a given habitat or ecoregion (see Chapter 2) could, in the long run, provide detailed and representative demographic data. In the interim, a default dataset that is most representative of the target HMA with site-specific sex-structure and age-structure data could be used. However, a clear description of input parameters, including those needed for various management alternatives, and a detailed description of and justification for the WinEquus options selected would help the general public to determine the reliability of modeling results. Furthermore, a clear explanation of whether or how results of population modeling were used would be helpful.

The committee noted that BLM's population-modeling efforts have focused on the near-term (about 10-year) projection of population size. This modeling (and management) focus is understandable given the mandate that herd size be kept between upper and lower appropriate management levels. In the long run, however, management strategies aimed at reducing population growth to a modest rate (such as 5 percent per year) with methods described in Chapter 4 (e.g., a more aggressive fertility-control program targeting both males and females) might be most effective. Such a strategy would ensure that unpredictable variation in the environmental factors and catastrophic events and uncertainty in the effects of management interventions would not reduce populations to below acceptable

size. Because only a small number of horses would have to be removed annually if the growth rate is modest, quick placement of removed horses could be possible. In addition, excessive reliance on a removal-based management strategy could backfire because removal can lead to rapid population increases due to density-dependent compensation (Zipkin et al. 2008, 2009). Compensatory (or overcompensatory) responses to removal may be contributing to the high growth rate realized by the free-ranging horse populations in many HMAs (see Chapters 2 and 3). Population models could identify an optimal mix of management interventions that would help to achieve management objectives in the face of (over)compensatory responses to removal, both in the short term and the long term.

Under the management regimes reviewed by the committee, BLM will have to remove free-ranging horses from western rangelands indefinitely unless very aggressive fertility-control programs are implemented (Garrott, 1991; Eagle et al., 1992; Garrott and Siniff, 1992; Gross, 2000; Bartholow, 2004, 2007). As briefly discussed in Chapter 2, there may be more horses in the short-term and long-term holding facilities than on the range. An average of more than 8,000 horses are moved from the free-ranging population to holding facilities annually, and almost 60 percent of the Wild Horse and Burro Program's budget was allocated to the care and maintenance of captive animals in fiscal year 2012 (BLM, 2012c). The amount of money needed to care for horses in the long-term holding facilities will continue to increase and, in the long run, could consume the entire budget allocated to the Wild Horse and Burro Program. Thus, BLM may have to consider other management options, including male fertility control. Chapter 3 suggests that self-regulation via density-dependent and density-independent processes is possible if populations are allowed to increase to higher numbers. Virtually all population-modeling efforts under the auspices of BLM have been focused on HMAs or HMA complexes; a modeling study evaluating the entire free-ranging horse population on the range and in holding facilities was not available at the time the report was prepared.

A comprehensive modeling study that evaluates population dynamics of horses in the western rangelands and in holding facilities and the costs and consequences of management alternatives, including those not currently available to BLM, would help in evaluating whether and to what extent stated management objectives are achievable under the current or projected funding situations and regulatory restrictions. Such a study could help to identify the most effective or cost-effective management options to achieve the objectives or achievable goals given available funding and policy constraints. However, the committee notes that usefulness and reliability of results of modeling exercises depends not only on the adequacy of the model itself but on the quality of data used to parameterize the model. As noted previously (see Chapter 2), data on representative sentinel herds can be used to obtain rigorous and representative estimates of demographic and management parameters. Monitoring of sentinel herds can also provide data that can be used to test models, that is, to evaluate how well predictions of the models under alternative management scenarios match observations. Models can be modified or updated as one learns from the management experiments and estimates of demographic and management parameters are refined. Consequently, the committee recommends that future modeling efforts be based on rigorous and reliable estimates of demographic and management parameters in an adaptive-management framework.

Adaptive management is an iterative decision-making process in the face of uncertainty (Williams et al., 2007; Nichols et al., 2011). It aims to reduce uncertainty by monitoring the state of the system, learning, and adjusting management decisions accordingly. Models of system behavior are an important component of adaptive management (Nichols et al., 2011). In the long run, free-ranging horse and burro population dynamics and management are

best modeled in an adaptive-management framework (Williams et al., 2001, 2007; Nichols et al., 2011). Chapters 7 and 8 provide details regarding how an adaptive-management framework might be applied to free-ranging horse and burro population management.

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7

Establishing and Adjusting Appropriate Management Levels

The Wild Free-Roaming Horses and Burros Act of 1971 (P.L. 92-195), as amended by the Public Rangelands Improvement Act of 1978 (P.L. 95-514), requires the Bureau of Land Management (BLM) to “determine appropriate management levels for wild free-roaming horses and burros on [designated] public lands.” The legislation makes BLM responsible for deciding how these appropriate management levels (AMLs) of free-ranging horses and burros should be achieved within the agency’s multiple-use mandate, including consideration for wildlife, livestock, wilderness, and recreation. BLM is also directed to manage for a thriving natural ecological balance, to prevent deterioration of the range, and to use minimal management for free-ranging horses and burros.

An AML has been interpreted by BLM as being a population size with upper and lower bounds for each individual Herd Management Area (HMA). Options listed in the legislation for keeping horses and burros within set population levels include removal of animals from the range, destruction of animals,¹ sterilization, and natural controls on population levels, although the legislation does not limit BLM to these actions or specify acceptable types of sterilization or natural controls. Much of the controversy surrounding the management of free-ranging horses and burros focuses on the appropriate limit, if any, for the numbers of these animals on the range and how to keep free-ranging equid populations within a prescribed limit. From submitted public comments and statements made by members of the public at information-gathering meetings, it was clear to the committee that stakeholders vary in their opinions about how AMLs are established and what constitutes an AML. Because AMLs are a focal point of controversy, how they are established, monitored, and adjusted should be transparent to stakeholders and supported by scientific information.

¹The destruction of healthy, unadoptable free-ranging horses and burros has been restricted by a moratorium instituted by the director of BLM since 1982 and by the annual congressional appropriations bill for the Department of the Interior since 1988.

The committee was asked to

- Evaluate BLM's approach to establishing or adjusting AMLs as described in the *Wild Horses and Burros Management Handbook* (BLM, 2010).
- Determine, on the basis of scientific and technical considerations, whether there are other approaches to establishing or adjusting AMLs that BLM should consider.
- Suggest how BLM might improve its ability to validate AMLs.

To accomplish its assignment, the committee first investigated the basis of the *Wild Horses and Burros Management Handbook* approach to setting AMLs. The investigation included gaining an understanding of legislative definitions and interpretations that BLM has used to develop its AML policies. The committee then evaluated BLM's approach to setting AMLs as described in the handbook. Finally, the committee explored alternative, improved approaches that BLM could consider in setting and validating AMLs.

Scientific methods can be used to assess the condition of rangeland and its ability to sustain foraging and browsing animals. However, decisions regarding what kinds of animals should occupy the land, how many species should be in an area, how the land should be used, and what the balance of different uses of the land should be are questions of policy, not science. The committee's task in this chapter is to explore the science behind the establishment and adjustment of appropriate management levels.

THE HISTORY OF APPROPRIATE MANAGEMENT LEVELS

The *Wild Horses and Burros Management Handbook* was written in response to a critique by the Government Accountability Office (GAO) stating that, as of 2008, BLM had not provided formal guidance to its field offices on how AMLs should be established and that there was a lack of consistency in setting AMLs in the agency (GAO, 2008). The following summarizes the legislative context for establishing and adjusting AMLs. It then draws conclusions about the challenges inherent in establishing and adjusting AMLs on the basis of the committee's review of the legislation.

The Legislative Setting for Establishment of Appropriate Management Levels

The Public Rangelands Improvement Act of 1978 amended the 1971 act to state that information from rangeland inventory and monitoring, land-use planning, and court-ordered environmental impact statements should be used to determine whether horses are exceeding AMLs. The 1978 *Code of Federal Regulations* (CFR) asserted that BLM should ascertain the optimum number of free-ranging equids supported by an area and that enough forage should be allocated to horses and burros to maintain them at that number in healthy conditions while considering an area's soil and watershed conditions, wildlife, environmental quality, and domestic livestock (43 CFR §4730.3 [1978]). The concept of defining AMLs by the optimum number of horses that maintains a thriving natural ecological balance and avoids deterioration of the range was reaffirmed in *Dahl v. Clark*, 600 F. Supp 585, 592 (1984) and by the Department of the Interior's Interior Board of Land Appeals (IBLA) (*Animal Protection Institute of America*, 109 IBLA 112, 119 [1989]).

Under its enabling legislation, the 1976 Federal Land Policy and Management Act (P.L. 94-579), BLM is required to manage public lands under the principles of multiple use and sustained yield. The agency's objectives are

1) to periodically and systematically inventory public lands and their resources and their present and future use projected through land-use planning processes; 2) to manage public lands on the basis of multiple use and sustained yield; 3) to manage public lands in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; 4) where appropriate, to preserve and protect certain public lands in their natural condition; 5) to provide food and habitat for fish and wildlife and domestic animals; 6) to provide for outdoor recreation and human occupancy and use; and 7) to manage, maintain and improve the condition of the public rangelands so that they become as productive as feasible for all rangeland values in accordance with management objectives and the land use planning process. (BLM, 2001, p. I-1)

Those objectives originate with the Taylor Grazing Act of 1934 (P.L. 73-482), as amended and supplemented by the Federal Land Policy and Management Act of 1976, and the Public Rangelands Improvement Act of 1978. In addition, managers of free-ranging horses and burros must also be mindful of or necessarily follow (depending on the particular law) the guidance in the Wilderness Act of 1964 (P.L. 88-577), the National Historic Preservation Act of 1966 (P.L. 89-665), the Clean Water Act of 1972 (P.L. 92-500), the Endangered Species Act of 1973 (P.L. 93-205), the Forest and Rangeland Renewable Resources Planning Act of 1974 (P.L. 93-378), and others. Managers of free-ranging horses and burros must balance a litany of complex and even conflicting considerations when setting and maintaining AMLs in the context of those laws. A Senate conference report that accompanied the Wild Free-Roaming Horses and Burros Act states

The principal goal of this legislation is to provide for the protection of the animals from man and not the single use management of areas for the benefit of wild free-roaming horses and burros. It is the intent of the committee that the wild free-roaming horses and burros be specifically incorporated as a component of the multiple-use plans governing the use of the public lands. (U.S. Congress, 1971, p. 3)

Historically, BLM efforts to identify the appropriate number of free-ranging equids that should inhabit each HMA have been challenging and controversial, even after the term *optimum* was replaced in the CFR with the charge to “consider the appropriate management level for the herd, the habitat requirements of the animals, [and] the relationships with other uses of the public and adjacent private lands” while continuing to manage free-ranging horses and burros on designated HMAs (43 CFR §4710.3-1 [1986]). Previous reviews of BLM’s setting of AMLs consistently reported that established AMLs were not based on thorough assessments of range conditions. The U.S. District Court for the District of Nevada, IBLA, and GAO all noted that AMLs of many HMAs in the 1970s and some in the 1980s were based on administrative decisions rather than information about the carrying capacity of the range (*Dahl v. Clark*, 1984; 109 IBLA 119; GAO, 1990). The agency acknowledged in its 2003 strategic plan (updated in 2005) that diverse methods had been used to establish AMLs (BLM, 2003, revised 2005). In general, more consistent data collection has also been recommended for grazing management (Veblen et al., 2011).

Even though AML determination has been harmonized to derive from an agency-wide land-use planning process, diversity is still an issue because each state office conducts habitat assessment in its own way (BLM, 2003, revised 2005). In addition to a critique that formal guidance on setting AMLs had not been given to field offices, the 2008 GAO report noted that, as late as 2002, AMLs had not been set for two-thirds of HMAs.

Major Challenges in Defining Appropriate Management Levels in Prescribed Legislation

The committee identified three overarching challenges that permeate any consideration of how to set or adjust AMLs. These challenges stem from the historical and legislative background of AMLs and the institutional and environmental context of BLM in considering the setting and adjustment of AMLs.

First, although biological and physical measurements are used to estimate the capacity of rangelands to support free-ranging horses and burros, the allocation of forage among multiple users is a policy decision.

Second, the legislation includes requirements that seem contradictory. As reviewed in Chapter 1, the 1971 act (as amended) calls for horses and burros to be managed “as an integral part of the natural system of the public lands” and that “all management activities shall be at the minimal feasible level” but also requires the protection of a thriving natural ecological balance, which encompasses other species—especially threatened, endangered, and sensitive species—and avoidance of range deterioration caused by overpopulation. As a result, horses and burros are limited to specified areas, populations are controlled, and herds are largely protected from starvation and drought. Thus, the stipulations for their management are different from those for wildlife, which can be hunted or left to self-regulate naturally, and for livestock, which can be removed from the range by their owners at BLM request.

Equids have been able to inhabit western rangelands for hundreds of years without human intervention despite weather, predation, and disease. On most HMAs, horse populations have demonstrated an ability to reproduce at a rate sufficient to sustain themselves and, in most cases, to increase in abundance. However, their reproductive success may cause them to migrate or disperse in search of more resources or to have undesirable effects on soils and vegetation, both of which can bring them into conflict with other land uses. Population processes involved in food limitation, climatically driven variations in food and water, fire, predation, or natural barriers that limit access to additional food can, in some circumstances, effectively operate to regulate populations without human intervention (see Chapter 3). However, allowing horses or burros to self-regulate by permitting them to starve or to suffer from disease outbreaks is unacceptable to a large portion of the public (see section “Consequences and Indicators of Self-Limitation” in Chapter 3) and herbivory-induced changes in soils and vegetation may be unacceptable to some. Restricting horses and burros to designated HMAs can interfere with processes involved in self-regulation when dispersal or migratory movements are disrupted, when key resource areas are made unavailable (see Chapter 3), or when natural predators are lacking (see section “Effects of Predation” in Chapter 3). Management interventions may become necessary as surrogates for self-regulation processes. Interventions likely involve removals because hunting, euthanasia, and sale for slaughter are not currently acceptable options.

Setting AMLs in light of conflicting mandates leads to expensive and controversial approaches to management of rangeland herbivores, including gathering and removing horses and burros, fertility control, manipulation of genetic attributes, adoption, and feeding or pasturing horses. Each of those actions takes management of free-ranging horses and burros further from the ideal of minimal management as envisioned in the original legislation, regardless of how they represent attempts to work within the institutional and legal framework that shapes and constrains the protections for free-ranging horses and burros.

Third, although the legislation calls for setting AMLs to maintain a thriving natural ecological balance and to prevent rangeland deterioration, these terms are uninformed by

science and open to multiple interpretations; precise definitions would improve the ability to use them as goals for management. For example, the concept of a thriving natural ecological balance does not provide guidance for determining how to allocate forage and other resources among multiple uses, which ecosystem components should be included and monitored in the “balance,” or when a system is considered to be out of balance. It brings up arguments over whether such a balance exists in nature or is even possible. Avoiding rangeland deterioration and setting of land health standards may be seen as a problem of developing specific ecological measurements and standards or as a matter of arriving at a consensus about how rangelands should be maintained. A standard, broadly agreed-on definition of rangeland deterioration and how to measure it has proved an elusive goal for decades.

EVALUATION OF THE HANDBOOK APPROACH

The BLM *Wild Horses and Burros Management Handbook* was written to respond to GAO’s criticism that BLM had not provided guidance to its field offices on how AMLs should be established. To understand how AMLs were set without a specific protocol, the committee surveyed 40 HMAs (Box 7-1). Beever and Aldridge (2011) provided a comprehensive review of criteria used by BLM managers to establish AMLs.

The handbook seeks to rectify the lack of guidelines for setting AMLs by making recommendations for their establishment and adjustment in several sections. Most specifically, Appendix 3 of the handbook defines AMLs and provides guidelines for setting them.

AML decisions determine the number of WH&B [wild horses and burros] to be managed within an HMA or complex of HMAs. AML is expressed as a population range with an upper and lower limit. The AML upper limit is the number of WH&B which results in a TNEB [thriving natural ecological balance] and avoids a deterioration of the range. The AML lower limit is normally set at a number that allows the population to grow to the upper limit over a 4-5 year period, without any interim gathers to remove excess wild horses and burros. (BLM, 2010, p. 67)

Table E-1 in Appendix E shows the upper limit set for HMAs as of May 2012. The handbook states that an AML should be evaluated or re-evaluated “when review of resource monitoring and population inventory data indicates the AML may no longer be appropriate” (BLM, 2010, p. 18). Reasons that may warrant a re-evaluation include changes in the environment; newly federally protected threatened, endangered, or sensitive species; and other relevant data.

The handbook prescribes processes for the decision-making aspects of setting and adjusting AMLs. Chapter 2 of the handbook, on land-use planning, suggests that the process of setting and adjusting AMLs should take place as part of comprehensive planning, should be based on monitoring and evaluation, and should follow required decision-making procedures.

AML may be adjusted (either up or down) through the site-specific environmental analysis and decision process required by the National Environmental Policy Act of 1970 (NEPA) (P.L. 91-190). An analysis under NEPA is also required to establish a population range (upper and lower limit) for AMLs initially established as a single number. Development of a LUP [land-use plan] amendment or revision is not generally required. (BLM, 2010, p. 10)

The handbook states that an LUP should provide a process for adjusting AMLs once they are established. The process varies from one LUP area to another. If an LUP does not

BOX 7-1
Reasons Given by Managers for Setting and
Adjusting Appropriate Management Levels

The committee recognized that, by and large, AMLs for individual HMAs had been set before the publication of the handbook in June 2010 and that little time had passed for adjustments to be made between the publication and when the committee's survey questions (Appendix D) were distributed to 40 HMAs in January 2012. The committee wanted to gain an understanding of how AMLs had been established and adjusted before publication of the handbook. The 40 HMAs in the survey were the same as those sampled for population-estimate and survey-method information (Appendix E, Table E-3).

Survey respondents reported considerable variation at the HMA level in the approaches used for assessment and monitoring on HMAs. Establishment of HMAs generally occurred through consultation with state departments of fish and game for habitat and wildlife assessment, as called for in the legislation; use of state or regional BLM standards for rangeland (or public land) health as the "Standards for Land Health" stipulated as a goal in the handbook (BLM, 2010, p. 59); and reliance on the number of horses and cattle on the range at the time of HMA establishment to determine a goal for population levels, and in some cases to establish a ratio of number of horses to number of cattle as a framework for adjusting numbers.

The committee asked BLM managers who had been surveyed how they allocated forage among horses, cattle, and wildlife. Only a few fully addressed the question, and their responses were diverse. Use at the time of AML establishment was the most common answer, along with use of the original numbers at the time of the establishment of the HMA, the number specified in accordance with a resource management plan, the outcome of a land-use planning process, or a combination of the three. For example, in one HMA, the allocation between free-ranging horses and livestock was based on the original AMLs in the resource management plan, maintaining the original ratio of forage use for livestock and horses so that livestock and horses were reduced at the same rate. In this HMA, forage allocations were not increased because all the areas were stocked at or above carrying capacity. In another state, managers reported that in consultation with their department of fish and wildlife, the biologists at BLM made forage allocations to the native and exotic ungulates. Often, the forage allocated for existing livestock grazing privileges in an HMA was subtracted from total forage availability to determine the amount available to wildlife and horses.

Participating districts reported that measures of range condition and trend, upland utilization (amount of forage grazed, also termed "actual use" away from water), noxious weeds, and other types of rangeland and vegetation monitoring were considered relevant to adjusting and setting AMLs. One district used "negatively impacted vegetation functionality" as part of the justification to adjust an AML. Such considerations were frequent among reasons listed by managers for resetting or reaffirming AMLs. No data were provided on the metrics used to make the decisions, although some managers referred to other reports and multiple-use directives that were used in arriving at decisions. Monitoring of range and animal conditions; threatened, endangered, and sensitive species; and habitat was also conducted as part of setting, maintaining, or adjusting AMLs according to the survey. Most respondents to the committee's survey reported that rangeland-monitoring studies (upland utilization, upland and riparian trend, and noxious-weeds monitoring) were being used to assess and evaluate forage availability in HMAs.^a

On one HMA in another state, the AML was set after an intensive 5-year monitoring program. Data that were used included actual use, range condition and trends, utilization, precipitation, range sites, observations, and frequency of concentration areas for free-ranging horses. To change the AML again, the district

provide a process for adjusting AMLs, it may need to be revised or amended so that AML adjustments can be made.

In the committee's view, the setting of an AML within a NEPA planning process when allocating resources among uses is in concert with the recognition that tradeoffs and values are parts of management decisions. The NEPA process provides for public comment and review and increases public participation in environmental decisions although the relationship is consultative rather than collaborative, tends to be bureaucratic, and

reported that it would need to conduct a similar monitoring program that would include re-examining the entire HMA and potentially reallocating forage for all animals.

One district reported that in the 1975 HMA planning process, forage-production calculations from 1952 were used to estimate how many animals could be supported on BLM-managed land in the HMA. That carrying capacity was revised in 1975 because of rangeland seedings conducted in the HMA in 1974. BLM then identified the forage allocated to existing livestock grazing privileges in the HMA and subtracted that amount to calculate forage available to horses and wildlife. The state department of fish and wildlife was consulted to determine the forage required by wildlife. Forage allocations to livestock, wildlife, and free-ranging horses were made commensurate with the available forage within a reasonable distance from water and in consultation with the state wildlife agency.

Managers in one state reported limiting forage use to 55 percent of production. No details were provided as to how annual plant production was determined.

The committee received the most comprehensive response to the question of allowable use from managers who used forage production maps from 1958 to estimate total forage production and determined the forage available on the basis of 50-percent utilization rate. The biologists reported currently using monitoring studies to assess and evaluate forage allocations in the HMAs.

Because horses are on the range year-round but cattle are not, temporal separation has been used to distinguish horse and cattle effects on water holes and other features. Surveyed managers of districts in California, Oregon, and Wyoming cited effects on watersheds and riparian areas, riparian utilization, riparian trend, and insufficient or unreliable water as causes for adjustment. "Timing and duration of flow" was also provided as a reason for changing AMLs.

Managers of the 40 surveyed HMAs reported that AMLs often had been adjusted or reaffirmed since 1971. For example, on one HMA, AMLs were changed 13 times from 1979 to 2007. Reasons for the changes were related either to four essential habitat components (forage, water, cover, and space) or to the political process. Examples of reasons included emergency gathers after extensive wildland fire, free-ranging horse distribution data, absence or inadequacy of winter range available for horses, climate and weather, and change in space available to free-ranging equids (for example, because of land closures, land trades, land-use planning efforts, boundary discrepancies, or a "checkerboard" jurisdictional pattern adjoining HMAs). Responders also cited splitting current herds into smaller groups, adverse effects of horses on cultural resources, improving vegetation conditions, enhancing wildlife habitat, and updating management plans as reasons for adjusting AMLs.

^aAll Bureau of Land Management grazing allotments are periodically evaluated to assess rangeland health and evaluate the trend in rangeland condition and the influence grazing management has on the multiple rangeland resources associated with these allotments. [As an example, one district] employs two methods of evaluating grazing allotments. The first strategy involves a one-time field assessment by an Interdisciplinary Team composed of various BLM resource specialists. This team completes an assessment based on observations of vegetation and soil conditions. The second, and most commonly used strategy, involves a formal allotment evaluation process. During this process, an interdisciplinary team composed of various resource specialists evaluates resource conditions and creates management recommendations for the allotment. The end product of this process is an allotment evaluation document which summarizes resource conditions and trend and makes recommendations for future grazing management and range improvements on the allotment. Typically allotment evaluations occur every five to 10 years depending on the resource concerns for a given allotment." (Sharp, no date, p. 1)

does not foster deliberation (Hourdequin et al., 2012). In any case, the decision-making process should be clearly distinguished from the data-gathering and analysis that provide the information used in decision-making. The committee's focus is on the scientific analysis that feeds into decisions that ultimately must reflect social values, compromise, and economic realities.

A multitiered analysis process is stipulated by the handbook for establishing and adjusting AMLs. Tier One instructs managers of free-ranging horses and burros to "determine

whether the four essential habitat components (forage, water, cover, and space) are present in sufficient amounts to sustain healthy [wild horse and burro] populations and healthy rangelands over the long-term” (BLM, 2010, p. 67). Assessing the amount of sustainable forage available for the animals’ use is required by Tier Two. Tier Three concerns the genetic health of populations. Tiers One and Two are germane to this chapter; issues pertaining to Tier Three are discussed in Chapter 5.

The Tier One evaluation as described in the handbook for four habitat factors—forage, water, cover, and space—determines whether the features necessary to support horse and burro basic needs are present. It considers water, forage, space, and cover as limiting factors and requires evaluation of whether they are sufficient. Because of the inherent climatic variability of typical rangelands, the handbook recommends evaluating rangelands under conditions when they are likely to be low in forage production. Tier Two considers forage availability and quantity in detail. This section first reviews the handbook’s approach to water, cover, and space and then discusses its approach to forage. Forage availability is described in greater detail because it must be measured and used as a primary method for determining the number of herbivores that the range will support in Tier Two of the handbook-prescribed analysis. The section concludes with a review of problems related to terms and consistency in the handbook.

Water

In keeping with its approach of using limiting factors to evaluate habitat suitability for horses and burros, the handbook instructs managers that the amount of available water is to be calculated on the basis of the driest part of the year (BLM, 2010). However, the handbook does not expand beyond the limiting-factors concept and provides little information about the importance of water in sustaining populations or about specific protocols for water monitoring and assessment. Water quantity and availability are to be assessed, but the handbook does not discuss poor water quality (such as nutrient content, sediment load, and water temperature). One BLM district reported in the committee’s survey that in its 1975 HMA plan process, water was identified as a limiting factor for summer use in drought years; as a result, forage allocations to livestock, wildlife, and free-ranging horses were then made with specific attention to water supplies and carrying capacity. One concern of the committee would be the age of the data because water supplies, developments, and land use have often changed and are subject to further alterations because of climate change. Another concern would be the possibility of conflict arising from competition between BLM and state agencies with responsibilities for water management. For example, the Nevada Division of Environmental Protection is responsible for water-quality standards and monitoring in the state. To prevent overlapping or competitive efforts, cooperative interaction between that office and BLM would be valuable.

Although riparian condition has been used as one of a suite of criteria to justify removal of free-ranging equids, the handbook provides relatively little specificity on the criteria to use in such decisions. Areas near water should be considered foci of concentration for horses and burros and monitored accordingly. Analyses of habitat use by free-ranging horses in sagebrush (*Artemisia* spp.) communities reported that horses seek riparian habitats (Crane et al., 1997). Free-ranging horses typically range farther from water sources than domestic cattle but need more water than forage alone can provide in most seasons and locations. Free-ranging horses can travel to water every 3 days to twice a day, and numerous factors affect their drinking frequency, for example, ambient temperature, succulence of existing

vegetation, wind speeds, and activity levels (Pellegrini, 1971; Meeker, 1979; Greyling et al., 2007). Horses' use of water can affect water sources that influence vegetation, soils, and other species, so amounts and effects of current use should also be considered in evaluating water as a habitat component (Greyling et al., 2007). Use of areas near streams can increase runoff (Dyring, 1990b; Rogers, 1994), break down streambanks (Dyring, 1990a), reduce water quality (Nimmo and Miller, 2007), cause vegetation trampling, alterations in stream flow, and downstream siltation (Rogers, 1991), and accelerate gully erosion (Berman et al., 1988). Boggy habitats also can be altered by free-ranging horses (Dyring, 1990b; Rogers, 1991; Clemann, 2002). Similarly, soils, vegetation, and small mammals in and adjacent to springs can be markedly affected by free-ranging equids even when livestock have been absent for extended periods (Beever and Brussard, 2000).

There is evidence of interaction between forage characteristics and riparian-area use; the characteristics of forage may be affected by concentrated animal use near water. In the Sheldon National Wildlife Refuge in Nevada, 3 years of exclusion of free-ranging horses from grazing in riparian zones led to a 40-percent increase in cover of plant litter compared to bare ground and a 30-percent decrease in extent of bare ground, whereas these metrics remained generally constant in the paired riparian plots that continued to be grazed by horses (Boyd et al., 2012). In the nonexclosed areas, estimates of use from September to October based on standing biomass varied from negligible to nearly 100 percent (Boyd et al. 2012). In contrast, Greyling et al. (2007), studying areas of heavy use around a waterhole in Namibia, reported that the "expected degradation gradient radiating out from the water troughs due to over-utilization by the horses was not found. Neither vegetation species composition, density, nor standing biomass measured at various distances from the troughs confirmed a degradation gradient."

Methods of measuring riparian condition are available. Proper functioning condition is a monitoring tool developed by BLM to assess the physical functioning of riparian and wetland areas (BLM, 1998). It provides a consistent approach that takes into consideration hydrology, vegetation, and soil-landform attributes and encourages a team approach which includes wildlife, hydrology, and plant-science expertise. This method is qualitative by design and thus lacks rigorous quantitative analysis and statistical inference. However, it can provide a framework for identifying sites where water impairments have occurred and where improved management of water resources is required. Measures of water quality (such as temperature, salinity, nutrients, dissolved oxygen, and sediment) or hydrogeomorphology (such as groundwater discharge, active floodplain, sinuosity, and width and depth ratio) do not appear to be actively used by BLM and might serve as indicators for modifying management decisions related to free-ranging horses and burros (BLM, 1998). Soil conditions—such as storing moisture, allowing infiltration, stabilizing vegetation, and balanced release of water—and preventing rill or sheet erosion by water-caused or wind-caused dust are also possible indicators. A new synthesis of literature pertaining to riparian management practices (George et al., 2011) may provide insights on how to manage free-ranging horses in riparian areas. Further, a standard range-improvement action for mitigating damage to riparian areas involves fencing sensitive areas and providing troughs at locations away from natural waters. Given the extensive diversion, piping, and regulation of springs already in place across the western United States, additional use of troughs should be balanced against consideration for native fauna dependent on natural flows.

Cover and Space

Vegetation provides cover for free-ranging equids. For example, trees provide shade that allows equids to avoid direct insolation during the hottest times of the day, a rubbing surface that they can use to scratch topical irritations, visual concealment from predators, and forage (Pellegrini, 1971; Hanley, 1982). In the second paragraph of Chapter 3 of the handbook, an emphasis is placed on evaluating habitat suitability on the basis of access to “forage, water, or thermal or hiding cover.” The implication is that without access to those resources, horse removals may be necessary. Many models suggest that contemporary climate change may alter the distribution of trees and the balance of deciduous versus evergreen trees in parts of the domains of HMAs (Fuhlendorf et al., 1996, 2012; Tausch, 1999). The direct effects to horses of such changes are unknown. Before considering horse removals when cover and space are inadequate, where it does not cause conflict with other uses, managers may also consider increasing habitat availability by establishing greater connectivity between key habitats (through removing barriers and creating corridors for travel, habitat improvement, providing water at key points, land acquisition, or other methods).

It is not clear from the handbook (BLM, 2010) what is meant by *space*, and there does not seem to be a good definition or way of measuring it in the scientific literature. The analysis of adequate “space” in the handbook apparently is derived largely from whether the horses and burros will stay in the habitat. For example, the handbook states that the animals “require sufficient space to allow the herd to move freely between water and forage within seasonal habitats” (BLM, 2010, p. 13). The need to adjust AMLs because of changes in the area available to equids was cited several times by surveyed managers—such changes as land closures, land trades, LUP efforts, boundary discrepancies, or a “checkerboard” jurisdictional pattern adjoining or within HMAs.

To be more specific, the discussion in the handbook should emphasize the spatial movements of free-ranging horses and burros relative to water, cover, and forage. Other aspects that might be considered include the influence of sunshine, shade, the viewshed, predator escape routes, and slope position (e.g., leeward for shelter from weather and windy gaps for insect avoidance). There is a direct relationship between space and access to spatially heterogeneous resources (such as those listed) in landscapes where horses and burros may be (Coughenour, 1991, 2008). Those resources are often dispersed patchily. As a result, the four key habitat components (forage, water, cover, and space) and other resources are naturally heterogeneous in distribution and availability and should be evaluated on the basis of their spatial and temporal variability.

Because horses and burros, like most ungulates (Hobbs, 1996), use landscapes heterogeneously, assessment ideally would occur at multiple spatial resolutions. In particular, free-ranging equids will use some portions of the landscape often (especially when equid densities are high) and use other parts rarely or never (e.g., areas more than 15 km from water sources, slopes of more than 50 percent [Ganskopp and Vavra, 1987], and areas dominated by large boulders or monoliths). Multiple-resolution assessment could be especially valuable in situations in which dynamics at one spatial resolution can influence dynamics at other spatial resolutions (cross-scale dynamics; Allen, 2007).

Forage Availability

In a case study in Appendix 3 of the handbook, the amount of forage available for sustainable use by herbivores, or the carrying capacity of an HMA, is the accessible, palatable

biomass that grows on the site annually, modified by an allowable use factor (AU). An AU is the percentage of annual production that can be grazed without causing plants to decline in production and growth. Typical AUs are between 25 and 60 percent, meaning that 25 to 60 percent of the annual forage growth can safely be allocated to grazing; that is, it is available forage. However, AUs are often adjusted for local conditions, as it is in the case study, and for season of grazing; AUs are higher in dormant than in growing seasons. AUs are based on data about the effects of specific percentages of “use” on plant species and communities that are rarely available. Studies of the response of specific species and plant communities to herbivory and how the species and communities are influenced by season of grazing, the amount and frequency of herbivory, and varied growing conditions have been numerous but by no means comprehensive (e.g., Hanley, 1982; Paige and Whitham, 1987; Paige, 1992; Belsky et al., 1993; Hawkes and Sullivan, 2001). In fact, it is usually difficult to determine exactly how even widely used AUs were derived.

The handbook’s case study details the use of at least 3 years of grazing utilization and use mapping data with annual population estimates of horses to determine weighted utilization data, potential carrying capacity, and a proposed carrying capacity. It is not clear where the AU for plant species is acquired. In the case study, it appears that all the available forage will be allocated to horses and that only horse data are used, although at the end it is shown that the results can be converted for other herbivores (BLM, 2010). The explanation of how to calculate the weighted average forage utilization is relatively clear, but it is not clear how annually adjusted population estimates of horses, expressed in animal unit months (AUMs), are acquired. An AUM is a standardized unit of forage consumed per “animal unit” each month. Knowledge of annual herd population sizes for at least 3 years is critical for the prescribed method in that they are the basis for establishing annual forage availability, the most common habitat factor used for establishing AMLs.

Use of utilization and use mapping data to infer forage production levels is a pragmatic approach that takes multiple factors into account, including “background” consumption by all users of forage, areas of concentration, and site-specific production limitations. Ideally, however, direct forage-production data should also be used to determine forage availability. Measuring how much forage is consumed by what species (horses and burros versus livestock versus wildlife) would be helpful in determining how many animals can be supported relative to forage supply, although the committee acknowledges that this can be difficult. The methods for assessing utilization are not described in the manual; however, examination of various BLM reports indicated that utilization was simply visually estimated. This method is prone to inaccuracy and is generally not well validated. More direct measures of utilization could be made through the use of grazing exclosures, particularly movable exclosures. Issues related to determining horse population size are detailed in Chapter 2.

Another complication is that a substantial part of the diet of horses may not be herbaceous plants, such as grass, and the case study includes only herbaceous growth to calculate forage availability. A fair amount of research on diets of free-ranging horses of the western United States that occurred in the 1970s and 1980s confirmed that horses are typically grazers (that is, most of the food that they consume is grasses and graminoids) but that the proportions of individual food items and even of plant life forms consumed vary markedly annually, among seasons, by location, and among individuals, including variation by age, sex, and reproductive state and history (Hansen, 1976; Hubbard and Hansen, 1976; Hansen et al., 1977; Olsen and Hansen, 1977; Krysl et al., 1984; McInnis and Vavra, 1987). That is due in part to the fact that the nutritive value of plant species can vary markedly among seasons and years (Miraglia et al., 2008). Utilization of browse should be identified and

incorporated into carrying-capacity calculations when it proves to be an important source of forage for horses.

The handbook guidelines recognize the high variability in forage production on arid rangelands, stipulating that forage-availability estimates should be based on 3-5 years of utilization and use-pattern mapping. In addition, the handbook states that to determine whether forage is sufficient for long-term sustainable equid grazing, production data, ecological site condition, trend, frequency, precipitation, and standards for land health may be used (BLM, 2010). It appears that each local office has a great deal of discretion in determining which methods to use. The handbook guidelines stipulate that years of above-average forage production are not to be used in calculations of forage availability—a conservative approach that aims to reduce the need for emergency gathers. Rangeland that is not commonly used is also not included. However, the committee considers 3 years of data to be inadequate typically for capturing variation in forage production on arid lands.

There are useful parallels between the setting of AMLs for free-ranging equids and the setting of sustainable stocking rates in managed livestock systems. Both endeavor to achieve ecological sustainability although management objectives and methods are quite different. Campbell et al. (2006) evaluated conditions that favor different ways of determining how to establish the number of livestock that can be supported on rangelands. They contrasted two types of strategies for setting a livestock stocking rate: conservative and tracking. A conservative strategy maintains a roughly constant stocking rate, which is set so that carrying capacity, the ability of the range to provide adequate forage, is unlikely to be exceeded even in dry years (Sandford, 1983, 2004; Tainton, 1999 in Campbell et al., 2006); this approach errs on the side of caution for dry years—in which overstocking can lead to livestock losses and vegetation deterioration—as does the handbook strategy. A strategy that tracks forage availability is less static and changes stocking rates to track variable forage supply; thus, more animals are on the range in years of high rainfall and fewer in dry years. Different conditions favor one strategy or the other (Table 7-1).

Campbell et al. (2006) summarized research that demonstrated that forage growth and distribution in semiarid rangelands are influenced by precipitation and are highly variable across time and space. Average annual rainfall is the key factor in temporal variation. Temporal variation increases as annual rainfall decreases (Ellis and Swift, 1988; Campbell et al., 2006; Briske et al., 2011). Because variability in rangelands also occurs on macroscales

TABLE 7-1 Conditions That Influence the Number of Livestock That Can Be Supported by Forage Production in Pastoral Systems

	Conservative Strategy— Setting numbers below average that can be supported over the long term is more likely to be optimal if:	Tracking Strategy— Managing animal numbers to follow changes in forage supply annually is more likely to be optimal if:
Environmental Conditions		
Predictability of environmental variability	Environmental variability is high and unpredictable.	Environmental variability is highly predictable.
State changes and thresholds	The system is prone to state changes and thresholds that limit reversibility through management.	The system has high resilience and changes are likely to be reversible with management.

SOURCE: Adapted from Campbell et al. (2006).

(Campbell et al., 2006), even the largest HMA cannot buffer the variation in rainfall amount or distribution completely. As a result, variation in forage quality and quantity across space and time is high, and setting a static population level for herbivores runs counter to this complexity. The tracking strategy is argued to be more appropriate where environmental variability, such as in rainfall, is more predictable, allowing managers to anticipate need for adjustments in stocking, and a conservative strategy is more appropriate for locations with high variability and low predictability of environmental variability, such as in rainfall, because it reduces the number of years when drought would reduce forage production below levels adequate to support the animals (Campbell et al., 2006). As previously discussed, allowing free-ranging horses and burros to suffer from inadequate forage is precluded.

Extreme droughts will inevitably occur at unpredictable times. The location-specific effects of climate change are as yet largely uncertain. Studies suggest that temperature stress on ecosystems will be markedly higher (especially in summer) in the western United States, and there will probably be an increased frequency of extreme climatic conditions (Christensen et al., 2007; Mote and Redmond, 2012). It is clear that AMLs will need to be adaptable and periodically reassessed over the long run and subject to rapid adjustment in the short run. Gathers are the major means of adjusting the number of animals in response to drought. BLM may consider other options, which might include temporary supplemental forage or temporary movement or expansion by animals into unused range (if there were not conflicts with other resources). That might be accomplished through provision of water where there is no natural supply. However, unused range areas are quite possibly rare, and those options will only delay the need for a gather unless population growth is reduced.

In the case study in Appendix 3 of the handbook, despite the fact that allowable use was originally established to consider “year-round grazing” by horses, AUMs for horses are converted to their equivalents for other species, including livestock that are not on the range year-round (BLM, 2010). That highlights the difficulty of evaluating forage availability independently of allocation to various grazing animals. BLM considers a horse to be a single animal unit, consuming 1.0 AUM of forage per month. Horses consume more forage per unit of body weight than do ruminants (Hanley and Hanley, 1982), and the standard measure of an animal unit is a 1,000-lb cow and nursing calf. Several references to animal units for horses report that they consume more than 1.0 animal unit per month (1.2,² 1.3,³ or 1.0 for a 2-year-old horse and 1.5 for a horse 3 years old and older⁴). BLM should explain its choice of 1.0 animal unit for a horse.

Problematic Terms

As discussed in the section “Major Challenges in Defining Appropriate Management Levels in Prescribed Legislation,” vague definitions in the Wild Free-Roaming Horses and Burros Act and related legislation have created difficulty in implementing and assessing management strategies for free-ranging equids. The handbook does not provide any greater clarity. The committee reviewed two terms in detail to illustrate the problem: *land health standards* and *thriving natural ecological balance*.

²Available online at <http://www.gov.mb.ca/agriculture/crops/forages/bjb00s17.html/>. Accessed October 8, 2012.

³Available online at <http://cals.arizona.edu/pubs/animal/az1352.pdf/>. Accessed October 8, 2012.

⁴Available online at [http://www1.agric.gov.ab.ca/\\$department/deptdocs.nsf/all/faq6722/](http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/faq6722/). Accessed October 8, 2012.

Land Health Standards

The handbook states that horses “should be managed in a manner that assures significant progress is made toward achieving the Land Health Standards for upland vegetation and riparian plant communities, watershed function, and habitat quality for animal populations, as well as other site-specific or landscape-level objectives, including those necessary to protect and manage threatened, endangered, and sensitive species” (BLM, 2010, p. 17). The basis for setting land health standards is not described in the handbook but is described elsewhere (BLM, 2001). However, land health standards are not specifically incorporated into the AML-setting process as outlined in the handbook, and this reflects a disconnect between AMLs and BLM land-health assessment procedures. If land health standards are to be at the crux of AMLs, a handbook should include procedures for their scientific determination or specific references to established procedures published elsewhere and recommendations for using such procedures to set AMLs.

The BLM land health standards policy has been in effect for over 15 years. BLM developed regulations for livestock grazing administration beginning in 1995-1997. One of the regulations was that each BLM state director would, in consultation with the Resource Advisory Council in that state, develop standards for public-land health. BLM posts a number of state-level land health guidelines developed accordingly.⁵ The purpose of the standards is to provide a measure to determine land health and methods or guidelines to improve the health of public rangelands (BLM, 2001). Rangeland health is defined as “the degree to which the integrity of the soil and ecological processes of rangeland ecosystems are sustained. Rangeland health exists when ecological processes are functioning properly to maintain the structure, organization and activity of the system over time” (BLM, 2001, p. I-7). That is significant in that it calls for assessments not only of states but of ecosystem processes. Processes of interest pertain to hydrology, nutrient cycling, primary production, and vegetation dynamics. The 2001 document outlines a set of general procedures that should be followed to assess and achieve rangeland health. Notably, they include not only a call to assess current land health but a determination of the causal factors that have led to the current state on the basis of the best data and resource information available. That would require the development of conceptual or quantitative models of ecosystem functioning.

“Deterioration,” like “health” or “condition,” is determined by some measure of the difference between the current state of the system and some reference state. The question is, What is the appropriate reference state of a minimally managed free-ranging equid system? The difficulty of defining that state is similar to the difficulty of defining what constitutes overgrazing. Overgrazing is a level of herbivory that leads to some level of rangeland deterioration. However, overgrazing in a livestock production system may be defined differently from overgrazing in a system that is being managed for natural processes. Coughenour and Singer (1991) reported that definitions of overgrazing also depend on differences in theories of how ecosystems that have abundant large herbivores function without human intervention. Indicators of deterioration in rangeland health may or may not constitute evidence of overgrazing, depending on management objectives and the theory or conceptual model that the management is based on. Differences in definitions used by livestock producers and wildlife managers are particularly relevant here. It is problematic to define overgrazing where there is a call for minimal management and “wildness.”

⁵43CFR§4180. Available online at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5d253348ae12c9c0d76a8114b7eec027&rgn=div5&view=text&node=43:2.1.1.4.92&idno=43#43:2.1.1.4.92.9/>. Accessed October 8, 2012.

Thriving Natural Ecological Balance

The handbook does not provide guidance on how to assess a thriving natural ecological balance as called for in the legislation. It is also easily conflated with the allocation process, which is a policy-driven and sometimes court-adjudicated decision rather than something derived directly from currently available scientific information. The Wild Free-Roaming Horses and Burros Act is clear that habitat for wildlife and threatened, endangered, and sensitive species is not to be harmed by free-ranging horses and burros. Among the districts responding to the implementation survey, BLM consultation with state wildlife agencies (as instructed in the legislation) was fairly consistent. Wildlife considerations were mentioned in responses from several HMAs as reasons for adjusting AMLs, either explicitly in some HMAs or implicitly as reflected in allocation of forage. Concern for species listed as threatened, endangered, or sensitive under the U.S. Endangered Species Act was referred to by only one HMA complex in the survey sample to protect greater sage-grouse (*Centrocercus urophasianus*), an endangered species candidate, in Wyoming.

There are several possible interpretations of what constitutes a thriving natural ecological balance. It is not a scientific term.

Wildlife and Plant Diversity. BLM relies largely on state wildlife agencies to determine how to consider wildlife in the setting of AMLs. However, BLM has a responsibility to make sure that key indicators of free-ranging horse and burro effects are included in assessments of impacts to wildlife habitat.

Monitoring of wildlife and plant abundance and diversity is key to determining whether a thriving natural ecological balance is being preserved. Free-ranging horses and burros can affect species richness in a variety of habitats (Levin et al., 2002; Zalba and Cozzani, 2004). Manipulative experiments illustrate a dramatic array of indirect pathways by which free-ranging horses can affect components of marsh ecosystems (Levin et al., 2002). In addition to direct interference and other types of competition possibly experienced by large ungulates in areas that have free-ranging equids, wildlife sharing the range with free-ranging horses and burros can be subject to equids' effects on the structure, composition, and function of vegetation. Vegetation provides perching habitat for raptors, nesting habitat for breeding birds (including cavity-nesting and stick-nest-creating birds), concealment cover for greater sage-grouse and other ground-nesting birds (Beever and Aldridge, 2011), shade and thermal refuge, refuge from predators, and nutrients and energy for diverse animals. Numerous species are affected by equid impacts to soil. Recovery of some species has been attributed to removal of free-ranging horses (Nano et al., 2003). Wildlife and plant abundance has been reported to be influenced by free-ranging horses' presence (Coventry and Robertson, 1980; Mansergh, 1982; Gillespie et al., 1995; Beever and Brussard, 2000, 2004; Greyling, 2005). Reptile species richness was significantly lower at horse-used sites than at horse-removed sites studied in the western Great Basin (Beever and Brussard, 2004) and in the Austrian Alps (Coventry and Robertson, 1980; Mansergh, 1982), and reptiles are important as prey for numerous other species and as predators that influence biological integrity. Horse presence has been identified as potentially affecting ant mounds in the Great Basin (Beever and Herrick, 2006).

Interactions with Native Grazers. Native herbivores may have forage, space, water, and cover needs that overlap with those of free-ranging horses and burros. Therefore, monitoring of the status of native ungulates is crucial. In some cases, the presence of free-ranging horses has increased forage available to native species, as in the case of bitterbrush (*Purshia tridentata*)

in Utah (Reiner and Urness, 1982). Horses and burros can dominate other herbivores and exclude them from water sources, forcing a change in the habitat use of native grazers (Meeker, 1979; Berger, 1985; Ganskopp and Vavra, 1987; Coates and Schemnitz, 1994). The degree of overlap in diets and habitats determines the potential for competition. Elk and bison diets overlap with those of horses, but there have been few cases of concern about their interactions with horses. Elk inhabit low-elevation sagebrush-steppe habitats (Hobbs et al., 1996; Manier and Hobbs, 2007) and are found in some areas that have horses (Hansen et al., 1977), but their preferred habitats tend to be more mesic (moderately moist) and at higher elevations. Bison are primarily residents of the Great Plains and portions of the Rocky Mountains (Mack and Thompson, 1982); there is little sharing of range with horses.

In some areas, there has been concern about potential competition for forage between free-ranging equids and bighorn sheep. In the Pryor Mountains, Coates and Schemnitz (1994) found partial dietary overlap year-round, and Kissel (1996) found little overlap except in summer. Dietary overlap was minimized by the fact that a substantial fraction of bighorn sheep diets was shrubs, particularly the evergreen shrub mountain mahogany (*Cercocarpus* spp.), but shrubs were insignificant in horse diets. Horses and bighorn sheep also used markedly different habitats and overlapped little spatially. Modeling studies including consideration of diets and the extent of overlap in spatial ranges of the bighorns and horses also supported the idea that there was only a small degree of competition (Coughenour, 1999). Kissel (1996) concluded that there was little if any competition between horses and mule deer, inasmuch as the latter are primarily browsers and horses primarily grazers. Those two species had little spatial overlap because their habitat preferences are different. In contrast, competitive interactions between burros and bighorn sheep are important inasmuch as burros are mixed feeders and have substantial quantities of browse in their diets (Walters and Hansen, 1978; Seegmiller and Ohmart, 1981).

Interactions with Livestock. Free-ranging horses and livestock overlap in demands for forage and habitats. Cattle and horses are both primarily generalist grazers, consumers of palatable herbaceous vegetation. Horses and burros, however, are able to use lower-quality forage than cattle because of their cecal-digestive system (Hanley, 1982; Hanley and Hanley, 1982). Burros preferentially consume woody vegetation (shrubs, dwarf shrubs, stemmy forbs, and small trees). Horses and cattle use similar habitats, but they also diverge with respect to mobility and accessibility. Horses can travel great distances in a short time, they can travel further from water, and they can use rugged topography more readily than can cattle (Ganskopp and Vavra, 1987; Hampson et al., 2010).

Although it is often assumed that cattle, horses and burros, or wildlife always compete, recent research on zebras and cattle and on cattle and donkeys (donkeys served as surrogates for zebras in controlled experiments) showed that it is not always the case (Odadi et al., 2011a,b). When cattle were reared with donkeys, both grew faster than when each species was allowed to graze on its own. Facilitation occurred because the donkeys consumed tough, fibrous stems, allowing the cows to eat the more nutritious leaves, forbs, and regrowth; and the cattle helped to dilute the effects of ticks that plagued the donkeys. In semiarid habitat, the occurrence of light rains allowed grasses to continue growing after joint cropping by the two species changed the structure of the sward, thus improving forage quality. The extent to which horses and cattle can facilitate each other and improve rangeland in temperate grasslands requires further study and most certainly depends on the specifics of the ecosystem being considered. It is also critical to note that the Odadi et al. (2011a,b) research was carried out in African grasslands, which have a long, continuous coevolutionary history of herbivory by numerous ungulates and can have biomass and

graminoid diversity one to two magnitudes higher than some areas encompassed by HMAs of the western United States (Mack and Thompson, 1982). However, assuming that cattle and equids must compete because they share the same range is not necessarily warranted (du Toit, 2011).

Endangered Species. Of particular concern is the interaction of horses and greater sage-grouse. Possible interactions of free-ranging equids with greater sage-grouse were thoroughly outlined by Beever and Aldridge (2011). They described numerous mechanisms by which equids can influence their environment, and greater sage-grouse are known to be sensitive to those aspects of the environment (e.g., the height of herbaceous plants is important as concealment cover for nests), but no field research has directly addressed the relationships between equids and grouse. The authors outlined numerous research questions that might be addressed, given the continuing effort and concern related to greater sage-grouse and other sagebrush-associated species in western North America.

Possible alterations of the small-mammal community by free-ranging equids may be important because of the role of small mammals in aeration and bioturbation of soils, as prey for numerous terrestrial and aerial predators, in seed and nutrient redistribution, and as part of biotic integrity. Numerous other ecosystem processes and components are critically important for conserving the potential of BLM-administered landscapes to provide ecosystem services (e.g., clean water, noneroded soils, food, and fiber) and for allowing cost-effective maintenance of ecological function and biological diversity. All these are mandated by numerous laws, policies, and statutes related to rangeland health, water quality, endangered species, and other topics.

Challenges to Managing for a Thriving Natural Ecological Balance. Although allowing an equid ecosystem to self-regulate could be one approach to establishing a balance, it is also evident that this may not be a realistic objective in many cases, owing to human effects that are beyond the purview of BLM. Thus, as a result of human disruptions, a self-regulated system is not necessarily natural. Land use is a foremost human effect that constrains natural horse movements, dispersals, or migrations. In natural wildlife systems, herbivores are free to seek forage and avoid situations of depleted forage. Fragmentation of habitats due to land use or ownership that does not permit such movements is problematic for herbivore and vegetation sustainability (Coughenour, 2008). Another human intervention that disrupts natural ecological processes is the development of water sources that make otherwise unavailable areas of the landscape available for equid use. Water-scarce areas would naturally be refugia from horse use for a variety of plant and animal species that are less tolerant of horses' presence. The recent incursion of invasive plant species, such as the *Bromus* species which includes cheatgrass (*Bromus tectorum*), is another example of human effects that alter the possibility of a natural balance, as is the extirpation of predators, such as wolves, in some environments where they would otherwise occur.

There are scientific approaches for assessing human effects on such ecosystems and the degree to which they impair free-ranging horse and burro numbers and management. They include scientifically based modeling studies of alternative scenarios of the presence or absence of human effects. Methods that meet the objective of minimal management could be identified, targeted, and justified to mitigate the adverse human effects. For example, if landscape fragmentation has altered the capacity of the habitat to support horses, model-based assessments would be able to quantify how this has occurred and therefore provide support for management interventions that mitigate it. Similar assessments could address lack of predation, invasive plants, and water development.

Managing horse and burro populations as free-ranging with the minimal management called for in the Wild Free-Roaming Horses and Burros Act thus entails conceptual challenges associated with defining what constitutes land deterioration or health. The handbook does not help in such definition. The handbook should address the challenge of defining terms used as management criteria, including *appropriate, thriving, natural, in balance, healthy, and deteriorated*. The approach would involve the development of a conceptual model for ecosystem functioning relative to management objectives and the development of indicators that can be used to measure the degree of departure from a scientifically informed conceptual model of an “appropriately” functioning free-ranging equid ecosystem.

Specificity of Methods and Their Consistency among Herd Management Areas

The handbook does not adequately respond to GAO’s request for guidance; the level of detail that the handbook supports is too limited. The handbook does provide for some degree of consistency in goals, forage allocation, and general habitat considerations and should help to improve consistency in how AMLs are set. However, it does not provide detail on monitoring and assessment methods. That is intended to allow BLM managers to decide what specific approaches fit local environmental conditions and administrative capacity, but it makes it difficult to review the program’s on-the-ground methods. A better approach would be to provide specific options. Similar issues were identified with respect to establishing AMLs, population inventory, use patterns, animal distribution, other site-specific and landscape-level management objectives, and forage allocation (BLM, 2010). For example, the handbook states that the amount of forage available to allocate to free-ranging horses and burros shall be determined through in-depth evaluation of resource-monitoring data after a site-specific environmental assessment and multiple-use decision process⁶ that includes public involvement. There is no explanation of any of the data-collection methods. The handbook would be more informative if it provided guidelines on how to conduct various kinds of assessments (even if there were a variety of appropriate methods available) or referenced appropriate sources, linking them to particular settings or situations. In general, the handbook lacks clear protocols for evaluating habitat components other than forage availability. That is critical because without clear protocols specific enough to ensure repeatability, the monitoring organization cannot determine whether observed change is due to changes in condition or to changes in methods. Protocols should also include

⁶The multiple-use decision (MUD) process is generally used to establish livestock grazing, AMLs for free-ranging horses and burros, and recommendations for wildlife habitat management.

This process begins with an evaluation of range conditions; the evaluation assesses whether or not management and stocking levels for livestock, wild horses and/or burros, and wildlife are achieving rangeland objectives. If rangeland health objectives are not being met, changes in management or stocking levels are proposed. Proposed changes are analyzed in an environmental assessment and a proposed multiple-use decision is issued. Proposed decisions are subject to review and protest by parties affected by the proposal. BLM considers all protests filed and then issues a final multiple-use decision. BLM’s final decisions are subject to administrative review (appeal). (Appropriate Management Level. Available online at http://www.blm.gov/nv/st/en/prog/wh_b/appropriate_management.html. Accessed February 21, 2013.)

At the conclusion of the decision process the management actions are implemented and monitoring continues until the next evaluation. All decisions issued as a result of completion of an allotment evaluation are issued in the MUD format. The MUD format has four sections: Introduction; Livestock Grazing Management Decision; Wild Horse and Burro Management Decision; and Wildlife Decision. Each of these sections includes a rationale, citation of appropriate authority, and information about protests and appeal procedures. (Multiple Use Decision Process. Available online at http://www.blm.gov/nv/st/en/prog/grazing/multiple_use_decision.html. Accessed December 3, 2012.)

establishment of controls when the goal is to distinguish treatment or management effects from other causes of change.

ESTABLISHING AND VALIDATING APPROPRIATE MANAGEMENT LEVELS: SCIENCE AND PERCEPTIONS

The committee was asked to recommend methods for establishing and validating AMLs. The establishment of AMLs should be linked to consistent, scientifically supported models of range and herbivore interactions. Validating AMLs requires methods that draw on information on rangeland, equid, and wildlife dynamics for adaptive decision-making. Improved and more consistent monitoring is also needed. Processes for establishing and validating AMLs should be open and understood by stakeholders, and ultimately AMLs should be amenable to adaptation in light of new information and environmental and social change.

Understanding Ecosystem Dynamics

Numerous developments in ecological theory, in technologies and methods for assessing ecosystem status and trends at multiple resolutions, and in understanding arid rangelands dynamics and function have occurred since publication of the earlier National Research Council reports on free-ranging horses and burros (NRC, 1980, 1982). Developments in ecological research challenge the notion that a reliable minimum annual forage production that would allow the establishment of a static carrying capacity, or AML, over the long term can be determined. The research highlights the role of unpredictability on arid rangelands (Ellis and Swift, 1988; Westoby et al., 1989; Smith et al., 1995; Bestelmeyer et al., 2003; Briske et al., 2005; Vetter, 2005) and the importance of abiotic factors, such as weather events and fire, relative to biotic factors, such as competitive interactions among plants or grazing pressure, in determining vegetation expression. In short, the effects of a severe drought on forage availability often have more influence than herd population management.

It is important to distinguish between two foci for applying the concept of nonequilibrium rangeland dynamics. The first is a focus on plant-herbivore equilibria or nonequilibria. It was once theorized that plants and herbivores would come into a natural ecological balance or equilibrium if left undisturbed. Herbivore population growth would be slowed to zero at equilibrium because of density-dependent feedbacks arising from food limitation (see section "Density-Dependent Factors" in Chapter 3). However, it has been understood that population regulation also has density-independent terms, for example, weather variability (see section "Density-Independent Population Controls" in Chapter 3). Caughley (1987), who developed much of the theory of plant-herbivore dynamics, observed that, when abiotic variability is high, plant-herbivore systems exhibit nonequilibrium dynamics. That line of thought was further developed by others (DeAngelis and Waterhouse, 1987; Ellis and Swift, 1988; Behnke and Scoones, 1993; Illius and O'Connor, 1999). An important outcome of nonequilibrium plant-herbivore dynamics is that herbivore populations in such natural systems, where natural controls apply, cannot attain numbers high enough to degrade vegetation. Vegetation dynamics are driven largely by climate rather than herbivory. Vetter (2005) cited evidence from arid environments with annual rainfall coefficients of variation⁷ (CV) over 33 percent that suggests that these systems better fit the nonequilibrium plant-herbivore model (Ellis and Swift, 1988; Ward et al., 1998, 2000; Sullivan, 1998, cited in

⁷The coefficient of variation is the ratio of the standard deviation to the mean.

Sullivan and Rohde, 2002; Fernandez-Gimenez and Allen-Diaz, 1999, cited in Vetter, 2005). In such areas, vegetation cover, composition, and productivity are influenced largely by rainfall and other abiotic factors, and grazing intensity has been reported to have much less influence on these three aspects of the vegetation (Vetter, 2005). In more mesic sites with lower annual rainfall variation or reliable soil moisture, grazing has been reported to cause such changes as brush encroachment (Desta and Coppock, 2002) and alteration of grassland species composition (Fernandez-Gimenez and Allen-Diaz, 1999). Those sites may occur in or be intermixed with arid rangelands. Caughley (1987) first observed that plant-herbivore equilibria diminish markedly in strength above an annual rainfall CV of 33 percent. Ellis and Swift (1988) extended the theoretical 33-percent CV threshold. On a regional scale, HMAs are most commonly in areas that have an annual rainfall CV exceeding 33 percent (Figure 7-1).

The second focus for the application of nonequilibrium rangeland dynamics has been more broadly on vegetation dynamics and the multiplicity of factors that drive them, including climate and disturbance. A wealth of evidence and observation, perhaps beginning with Westoby et al. (1989) and Laycock (1991) if not Gleason (1917, 1926, 1927), supports the idea that vegetation dynamics in arid climates do not necessarily follow the theory of linear successional dynamics first proposed by Clements (1916), which provided the basis for assessing rangeland condition in the United States for several decades (Dyksterhuis, 1949; Briske et al., 2003). The ecological dynamics of vegetation on arid rangelands are now commonly characterized by using state-and-transition models that posit that relatively stable configurations of vegetation, or "states," exist and that they may "transition" to other such states as a result of the influence of biotic or abiotic factors, such as grazing, precipitation, species invasions, fire, and seed sources (Westoby et al., 1989; Bestelmeyer et al., 2003;

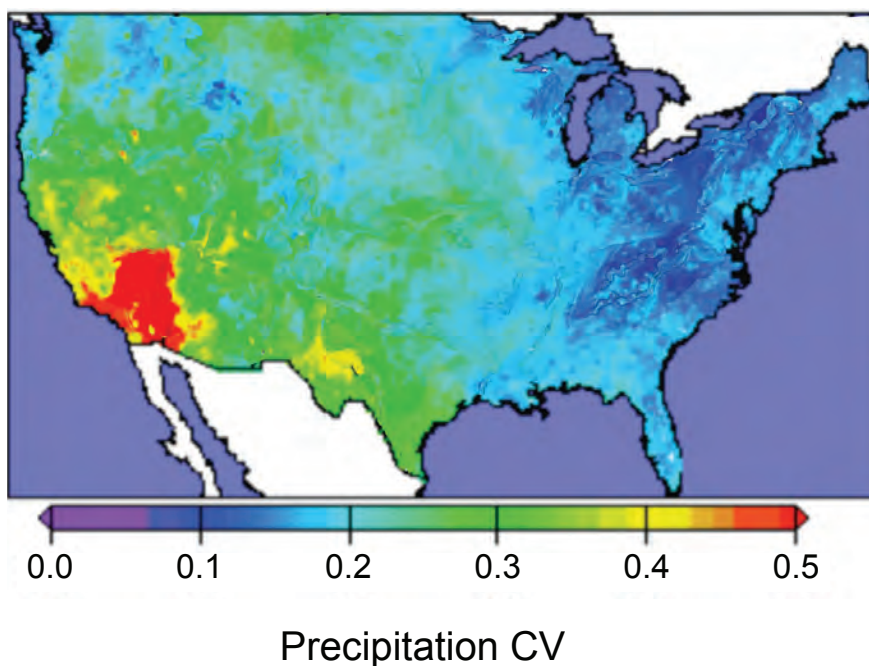


FIGURE 7-1 Coefficient of variation of annual rainfall in the contiguous United States. SOURCE: Adapted from Maurer et al. (2002) and Lettenmaier et al. (2008) .

Stringham et al., 2003; Briske et al., 2005, 2006). An inherent aspect of this concept is the acknowledgment that there may be thresholds between states and nonlinear dynamics: instead of a predictable, directional pattern of change, a state may transition to one of several alternative states, may not do so in any predictable timeframe, and may not transition back after a change (Belovsky, 1986; van de Koppel et al., 1997; Rietkerk et al., 2002; Peters et al., 2006; Bisigato et al., 2008). The state-and-transition framework does not exclude the occurrence of changes that follow linear successional trajectories (Bestelmeyer et al., 2003; Briske et al., 2005, 2006).

When an ecological threshold is crossed and an HMA or part of an HMA has entered an alternative state, the simple removal of horses or burros may not result in a return to the conditions of the previous state and AMLs may need adjustment. If recovery of biological structure and ecological processes that promote self-repair and facilitate long-term sustainability can be expected at all, such areas require additional resources and time. Areas that were suitable for horses or burros may become unsuitable, and areas that were unsuitable may become suitable.

In addition to the unpredictability and irregularity of rangeland dynamics, climate and social change add another level of uncertainty about future conditions. Setting of AMLs takes place in a context of ecological and social change (Bestelmeyer and Briske, 2012). Vegetation change, soil degradation, invasive species, and changing climate have already altered many rangelands, and such state changes are expected to occur more frequently (Williams and Jackson, 2007; Stafford Smith et al., 2007; Dai, 2011). Social values, economic conditions, and land use in HMAs as well as stakeholders, markets, and policies influencing ecosystem management are all undergoing change (Holmes, 2002; Sheridan, 2007; Brunson and Huntsinger, 2008). Ultimately, the challenges of these numerous sources of unpredictability demand that AMLs be adaptable.

State-and-transition models are synthetic, conceptual models that describe soil and vegetation dynamics (Bestelmeyer et al., 2003; Briske et al., 2005, 2006; Herrick et al., 2012). Models are refined as data become available, and they become increasingly data-driven rather than conceptual over time. Monitoring and site selection can be improved through identification of ecological sites with state-and-transition models (Herrick et al., 2012). The inventorying of ecological sites and linking of them to state-and-transition models are important efforts that BLM is already participating in with the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS). Such models offer the opportunity to capture information about the influence of management and both linear and nonlinear dynamics of ecosystem change, and they are useful in modeling efforts. Good conceptual models implicitly or explicitly identify influences and short-term response indicators in the description of transitions and pathways (Herrick et al., 2012). Information about free-ranging horse and burro management should be linked to ecological sites whenever possible. Over time, the outcomes of adaptive management can be used to improve the state-and-transition models.

The NRCS effort to develop state-and-transition models to guide rangeland management throughout the West is a valuable opportunity to create a standardized basis for managing for desirable ecosystem states that will go a long way to maintaining a thriving natural ecological balance as mandated by the Wild Free-Roaming Horses and Burros Act as amended (see Box 7-2). The committee recognizes that the development of state-and-transition models is in its infancy, is difficult, and may be beyond the purview of BLM and instead be in the domain of NRCS or other natural-resources management agencies and the scientific community. Increased and better defined collaboration between such agencies, the scientific community, and BLM is needed.

BOX 7-2**The Pryor Mountain Wild Horse Range Example of the Natural Resources Conservation Service Approach**

The Pryor Mountain Wild Horse Range is probably the most well-studied HMA in the nation (e.g., Garrott and Taylor, 1990; Coughenour, 1999; Fahnestock and Detling, 1999a,b; Singer and Schoenecker, 2000; Ricketts et al., 2004; Roelle et al., 2010). Widespread concern about the ability of the range to support wild ungulate populations prompted BLM to ask NRCS to perform a comprehensive inventory and assessment of the health of range in 2002-2003 (Ricketts et al., 2004). According to NRCS, its report was the most detailed assessment of any wild horse range to date (this presumably referred to all the HMAs under BLM purview). Although the Pryor Mountain Wild Horse Range supported 161 horses in 2003, the NRCS assessment determined carrying capacity should be 45-142 horses on the basis of the percent of rangeland in poor condition, the low similarities of vegetation to potential climax vegetation, a perceived downward trend in range condition, and evidence of severe erosion.

The approach taken by NRCS was different than that described in the BLM handbook. A more exhaustive methodology was used by NRCS, and this approach serves as an example of potential improvements to the BLM handbook approach. Nevertheless, it too has had notable limitations.

The approach used a systematic sampling of the entire landscape. The landscape was stratified into ecological sites on the basis of an earlier Soil Conservation Service soil survey. Transects were distributed among ecological sites within broader-scale inventory units by using stratified random sampling. Along each transect, 10 circular plots were sampled at 10- or 20-foot intervals. Vegetation biomass was determined by harvesting and weighing all plants, by double sampling with some being visually estimated, or by visual estimation only. Total forage availability was used to determine stocking rates. A "harvest efficiency" was applied in the same way as a proper use factor would be applied in the BLM approach. It was assumed, on the basis of an earlier literature review (Holechek, 1999), that 35- to 45-percent use is moderate for desert and semidesert environments. A value of 30 percent was used for preferred and desirable species and 10 percent for undesirables. Estimates were subjectively adjusted on the basis of judgments of whether plants had reached peak biomass and to account for grazing removals. Forage availability was further modified by distance from water and slope class. This approach is a more direct way of assessing forage biomass than the BLM handbook approach, but it is still subject to uncertainty in that visual estimates of biomass are used without clear evidence of calibration against actual measured weights; samples were taken in open,

An encouraging initiative in this direction is the collection of rangeland data on BLM lands by NRCS staff familiar with the National Resource Inventory data collection methods for rangelands that have been used since 2003 (L. Jolley, NRCS [retired], personal communication, February 2013). Those data are linked to development of state-and-transition models for specific ecological sites. Eventually, this will allow BLM to use the nationwide National Resource Inventory Resource Assessment database.⁸ This would be a valuable contribution to standardizing BLM methods and data nationwide.

Assessing Rangeland Deterioration

The handbook assumption appears to be that if forage and habitat components are adequate, range deterioration will not occur. Habitat structural characteristics and amount of forage available can be measured in a straightforward way, but what defines "range condition"—the "health" of the range—has been a subject of debate in scientific and management

⁸Available online at <http://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/nri/?&cid=stelprdb1041620/>. Accessed February 21, 2013.

grazed vegetation, and a subjective and unsubstantiated method of adjusting for grazing removal was used; sampling occurred only once in the growing season, but biomass is dynamic through the season; sampling occurred in only 1 year, but precipitation is highly variable among years (the BLM approach is superior in accounting for such variability); and a source based on pre-1976 range literature was cited for setting proper use levels. Proper use levels are based on available site-specific research, local experience, and trend data and should be adjusted through adaptive management (Swanson et al., 2006). Updates were not mentioned.

Rangeland condition was based on similarity in composition to that inside reference long-term exclosures. The underlying assumption was the traditional one: climax, ungrazed plant communities are in the best condition, as in the BLM method. However, plant communities grazed by herbivores cannot be expected to be like communities exclosed from grazing. They may be different, but they may be stable and productive. An attempt was made to assess trends in conditions relative to the presumed climax community, as evidenced by conditions in long-term exclosures. However, the assessment was based on judgments of condition at one time as determined by comparison to the presumed ungrazed climax condition rather than observations of changes over time. That underscores the need for long-term monitoring. It was not established that the vegetation community was changing, only that it was different from that in the ungrazed area. It is noteworthy that the grazed and ungrazed plots have not become more similar despite the fact that management removals have, for the most part, kept the horse population near the AMLs for many years. There is little evidence that all but elimination of the horses would result in such a convergence and no evidence that one "condition" is generally superior to the other.

Rangeland health was assessed by using a number of indicators "relative to soil and site stability, watershed and hydrologic function, and soil and plant community integrity" (Ricketts et al., 2004, p. 104). They included hydrological indicators—such as pedestaled plants, rills, gullies, and soil loss—and observations of plant mortality, bare ground, and litter (detritus). Although there was evidence of erosion due to overland flow and wind, it was not established how long it had been occurring, that it was not going on in the absence of grazing, or that changes in herbivore density would reduce erosion rates.

Finally, the assessment did not make substantial references to or comparisons with more detailed studies of vegetation and ecosystem functioning that used a greater number of grazing exclosures, measures of live and dead biomass dynamics over time, experimental design, statistics, and spatially explicit ecosystem modelling (Coughenour, 1999; Fahnestock and Detling, 1999a,b; Singer and Schoenecker, 2000).

communities for decades, and the handbook provides no additional clarity. As noted above, concepts underlying range-condition assessments in the 1970s, when the Wild Free-Roaming Horses and Burros Act was written, are now viewed as simplistic and not in line with current thinking regarding vegetation dynamics in arid lands. Although the handbook focuses primarily on the level of forage utilization as a determinant of AML, forage consumption is only one process associated with grazers' use of the landscape. Horses and burros have mechanical effects on plants and soils through trampling and on shrubs through rubbing (Beever et al., 2008). Therefore, other factors sensitive to equid presence may indicate ecosystem change due to equid grazing, including insect activity, soil compaction, species richness, condition of woody vegetation, and cover of plants (Beever et al., 2003). Areas used by free-ranging horses have been reported to exhibit soil loss, compaction, and erosion (Dale and Weaver, 1974; Dyring, 1990b; Whinam et al., 1994; Nimmo and Miller, 2007); soil was the ecosystem component that differed most between horse-occupied and horse-removed sites in the western Great Basin study (Beever and Herrick, 2006).

Although invasive species are receiving increased management and conservation attention (both in and outside BLM), the committee observed that there was relatively little guidance in the handbook on the effects of invasive species on AMLs. Invasive species may

be brought in by free-ranging equids (Campbell and Gibson, 2001) and spread by them (Dyring, 1990b; Rogers, 1991; Weaver and Adams, 1996; Campbell and Gibson, 2001; Loydi and Zalba, 2009). Most seeds pass through the equine digestive tract in less than 2 days, but some can be carried and remain viable for much longer periods (Janzen, 1981) and so can be transferred long distances. Seeds are also carried on the animal body. It can be difficult in practice to ascribe causation of invasive-plant presence and density to free-ranging equids, especially without controlled experiments. It is likewise unclear whether alterations (either decreases or increases) in grazing intensity can be expected to reverse or halt the spread of invasive species. Although invasive-plant ecology is still an emerging field, the handbook should offer some guidance based on what is known. Given the importance of invasive plants in altered fire regimes in the domain of BLM HMAs, the topic of how free-ranging equids relate to distribution and abundance of invasive plants may deserve increased research attention.

Livestock grazing has been reported to alter soil properties via compaction, hoof action and consequent erosion, and redistribution of nutrients such as nitrogen (Archer and Smeins, 1991; van de Koppel et al., 1997). However, hoof action may break physical surface crusts that impede infiltration and seed germination. Soil surface horizons are involved in numerous biotic and abiotic pathways in communities (Thurow, 1991; Belsky and Blumenthal, 1997; Beaver and Herrick, 2006). Given the importance of soil chemistry and physical attributes (e.g., related to compaction) for ecological function, the tight connection of soil measures to so many BLM mandates and arid-lands monitoring frameworks, and the relative dearth of information on equid-soil relationships, Beaver and Aldridge (2011) reported that further research on these relationships would increase ecological understanding and identify the implications of the relationships for the management of equid influence on soil resources. For example, they asked provocative questions, including the following: To what depth below the soil surface does compaction extend? Under what conditions will treading by equids lead to favorable or adverse hydrological outcomes? What factors (such as soil texture or percentage of clays, concentration of calcium carbonate, and depth to water or an impervious layer) most strongly modify soil responses to horse and burro densities? Consideration of such factors and interactions would strengthen assessments used to set AMLs.

Beaver et al. (2003) reported that 19 horse-grazed and horse-removed sites could not be clearly discriminated on the basis of the cover of key plant species consumed by horses (species measured by BLM specialists in horse-effects monitoring) or by using cover or frequency of all plant species. However, horse-occupied and horse-removed sites were clearly discriminated by using a diverse suite of variables that research had suggested were sensitive to grazing disturbance. The variables included density of ant mounds, soil-surface hardness, species richness, grass cover, forb cover, and shrub cover (Beaver et al., 2003).

Monitoring and Assessing Forage Availability

Once AMLs are established it is essential to determine whether forage consumption is at the predicted level. To account for factors other than grazing (such as weather) that can affect rangeland condition, determining effects of equid foraging ultimately requires comparisons of vegetation in areas where foraging occurs and where it is prevented. Consumption levels can then be compared with rangeland productivity. Grazing and browsing effects are typically measured by comparing vegetation production and composition in areas where grazing occurs with those in areas where it is excluded.

One of the easiest and most effective ways to compare vegetation features in grazed and ungrazed areas is to establish pairs of exclosed and grazed plots. Plots are chosen at random

with one plot at each site as a control and the other enclosed by an enclosure device such as a 1-m³ cage covered in wire mesh. With grazing excluded, changes in vegetation height, biomass, and percentage cover in cages provide estimates of productivity. In the paired plots outside cages, grazing will reduce vegetation biomass. Thus, differences between vegetation biomass inside and outside cages provide estimates of consumption. Clipping-based estimates are more accurate than visual estimates. Cages are moved regularly (one to three times per year) to prevent the cages themselves from altering productivity. The temporary enclosures can be used to determine whether current herbivore densities, as set through management removals, are achieving anticipated or target levels of offtake. Larger, permanent enclosures can also be established to determine the extent to which grazing changes vegetation cover and composition over time. Such enclosures can also be used to test the hypothesis that removal of grazing results in vegetation recovery.

Temporary enclosures are easy to deploy and relatively inexpensive to implement, but many replicates in habitats are required because each cage and the control paired with it provides estimates of productivity and consumption over only a small area. Moreover, small cages generally exclude trees and shrubs that provide browse for burros. Care must be taken to avoid statistical pseudoreplication because samples in each permanent enclosure are likely to be spatially correlated to a greater extent than samples among enclosures, for example, in different vegetation types or patches of vegetation and soils in the larger-scale matrix of landscape heterogeneity.

Although small-scale and large-scale enclosures are similar in many respects, they differ in important ways. Fenced areas allow detection of long-term changes in vegetation where grazing is excluded, whereas 1-m³ cages enable frequent and easy movement for measurement of annual production. Long-term enclosures may foster the development of vegetation and soil conditions different from those in areas routinely grazed by large herbivores, whereas small, movable enclosures maintain conditions more similar to the conditions of grazed vegetation. The different approaches have two implications. First, the conditions inside long-term enclosures may enhance or suppress plant growth compared with grazed vegetation. Reduced growth could arise from self-shading, rainfall interception, and lower rates of nutrient cycling in the ungrazed than in the grazed vegetation. As a result, growth (primary production) of the vegetation that is grazed cannot be estimated from data collected in long-term enclosures. Comparisons of vegetation in and outside large permanent enclosures provide different estimates of production and consumption from those of temporary enclosures because vegetation that develops within long-term enclosures often becomes quite different from that outside the enclosure. The vegetation that develops in long-term enclosures should not be considered “natural” or “desirable” if the objective is to conserve free-ranging populations of large herbivores.

Beever and Brussard (2000) concluded that enclosures are nonetheless an excellent monitoring and experimental design tool that had been underused to quantify influences of free-ranging horses on vegetation and wildlife. That is particularly relevant for BLM managers of free-ranging equids because numerous enclosures have been in place for some time, and a strategically placed network of large enclosures could provide BLM with robust data for quantifying the effects of free-ranging equids among HMAs, seasons, and years of different weather.

Sampling vegetation in and outside either type of enclosure is labor-intensive. As a result, techniques that relay easily acquired, remotely sensed data have become popular (see Box 7-3), even though the data are relatively coarse and generally cannot be used to monitor enclosures. Images from satellites routinely measure many spectral bands of reflected light from vegetation and provide long-term time series for examining changes in vegetation.

BOX 7-3 Use of Remote Sensing

Remote sensing is an effective and universal tool adapted to a wide array of applications in natural-resources science and management (Gross et al., 2006; Kennedy et al., 2009). It has utility for landscape assessment ranging from site-specific habitat management to broad landscape-scale predictions. Remote sensing can be used effectively to characterize heterogeneous landscapes on the basis of detection of abrupt changes or gradual trends and patterns. It can provide consistent and reliable information on ecological effects and can be used to monitor landscape change and to extract unique or important features from complex ecosystems (Kennedy et al., 2009). It is an excellent tool for landscape-level applications, such as range assessment, ecological monitoring, weed-invasion detection, and woodland-encroachment assessment.

The spatial resolution of an image refers to the size of the smallest object that can be detected (resolved) on the ground. In raster-based information, the resolution of an image is limited by the smallest pixel size. High-resolution information is characterized by small pixel sizes and low resolution by large pixel sizes. When comparing images or datasets from different HMAs, it is critical that the resolution of the images be known and preferable that they be comparable. The accuracy and reliability of an analyzed (classified) remotely sensed image may depend on its resolution.

Diverse sensor types and remote-sensing platforms are available, each with specific-resolution and spatial-extent parameters. Which sensor is chosen depends on management objectives and expected outcomes. Several of the sensors provide specific advantages for management of free-ranging horses and burros (Table 7-2).

TABLE 7-2 Description of Remote-Sensing Types and Their Advantages in Management of Free-Ranging Equids

Attribute	Image Type	Advantages and Opportunities
Patch-size detection	Fine grain: IKONOS, ^a Quickbird, ^b Aerial photography ^c	High spatial resolution. Delineation of habitat heterogeneity. Characterization of primary horse grazing and drinking areas.
Gradual landscape change	Fine grain: IKONOS, Quickbird, Aerial photography Moderate grain: Landsat, ASTER ^d	Fine-scale habitat structure and change in HMAs. Monitoring of effects and resource availability. Regional disturbance assessment, forage detection availability, and landscape-change detection.

The Normalized Difference Vegetation Index (NDVI) is widely used and compares infrared and near-infrared reflectance to measure vegetation abundance and quality. However, interpretation of those values in relation to actual rangeland quality requires “ground-truthing” based on actual measurements of vegetation. Moreover, sample ground-truthing in and outside large-scale enclosures remains essential for estimating consumption levels from remotely sensed spectral indexes and thus foraging effects on large areas. Care must

Attribute	Image Type	Advantages and Opportunities
Gradual landscape change (<i>continued</i>)	Coarse grain (MODIS, ^e AVHRR ^f)	Atmospheric influences and surface detection across broad spatial areas. Monitor regional shifts in vegetation structure.
Abrupt landscape change	Fine grain: IKONOS, Quickbird, Aerial photography	Inference of land use and land-use change by image analysis and interpretation. Annual or seasonal effect detection in HMAs.
	Moderate grain: Landsat, ASTER, SPOT, hyperspectral, AVRIS	Detection of disturbance events in large areas.
	Coarse grain (MODIS, AVHRR)	Large-scale disturbance and regional vegetation change such as drought. Cloud screening. NDVI of large areas for vegetation cover and predicted annual forage production.

^aThe IKONOS sensor is a high-resolution satellite that captures 3.2-m multispectral images and 1-m panchromatic data. It has wide application in natural-resources assessment and mapping, agriculture, forestry, natural disasters, change detection, and so on. It collects reflected wavelength bands that include panchromatic, blue, green, red, and near-infrared wavelengths; it can also be used to develop digital elevation models that represent the earth's topographic surface (<http://www.satimagingcorp.com/satellite-sensors>).

^bQuickbird is a high-resolution satellite sensor that collects 0.61-m resolution imagery. It is an excellent sensor for land-use and land-change detection, environmental analysis, and resource management. It has a short revisit time (93.5 minutes), making it effective in abrupt to gradual time-change analysis. Data come in panchromatic, red, blue, green, and near-infrared bands. It can be used to map and analyze fine-scale HMA features.

^cSeveral types of aerial photography are available or can be produced, depending on the type of information needed. Since 2006, the National Agricultural Imaging Program (NAIP) has provided color, and for some states and dates, color-infrared imagery. The images have a 1-m resolution and can be used to identify and map landscape features. In contrast with most high-resolution satellite sensors, which can be expensive, NAIP imagery is free to the consumer.

^dASTER (Advanced Spaceborne Thermal Emission and Reflection Radiometer) is used to obtain information on surface temperatures, reflectance patterns, and elevation changes. It is used to predict variability and trends in climate, weather, and surface structure (<http://asterweb.jpl.nasa.gov/index.asp>).

^eMODIS (Moderate Resolution Imaging Spectroradiometer) views the earth every 1–2 days, collecting data in 36 spectral bands. It is used to measure global dynamics and processes, including prediction of global climate change, to assist policy-makers in land protection. With a 250-m pixel size, the resolution can be considered relatively coarse-grained.

^fAVHRR (Advanced Very High Resolution Radiometer) is a satellite sensor that collects the earth's reflectance in five wide spectral bands (red, two near-infrared, and two thermal).

also be taken in interpreting the meaning of reflectance values because they are affected by the abundance of bare ground and the abundance of grasses and forbs relative to trees and shrubs. Once predictive statistical models are developed, remotely gathered data on large spatiotemporal scales can be used to measure changes in rangeland quality repeatedly. In that way, the effects of AMLs can be monitored from remote sensing and adjusted on a regular and timely basis.

Analytical and Modeling Approaches

Scientifically defensible approaches have been developed over the last 2 decades for assessing vegetation, herbivore, and ecosystem dynamics in spatially heterogeneous environments from landscape through regional and even to global scales. A wide variety of models have been developed that are capable of simulating vegetation, biogeochemistry, and hydrology dynamics in response to soils, changing climate, and, to a lesser extent, herbivory. A body of science in this field does exist focusing on vegetation and ecosystem responses to herbivory. Some models are capable of simulating interactive responses to herbivory, climate, and soils. Although computer modeling has been adopted by BLM to predict horse population responses to management and to assist in the setting of the lower bounds of AMLs (see Chapter 6), modeling has not been used to set the upper bounds of AMLs or to inform AML decisions. That would necessitate models of vegetation and ecosystem dynamics and the ability of such models to represent ecosystem dynamics in spatially heterogeneous environments and mobile herbivore populations. Assessments of AMLs could be made more robust and more informative by using the powerful analytical and modeling approaches.

A first step would be to use geographic information systems (GIS) and remote sensing to a greater extent in setting and evaluating AMLs. BLM uses GIS to some extent to quantify vegetation and forage production potentials in different range sites, as delineated by NRCS or older Soil Conservation Service soil surveys. Forage production estimates for each range site have been combined or scaled up by using GIS to derive forage production. However, there is a potential to do more with spatial data and to derive additional data from remote sensing, for example,

- Overlay spatial data on equid distributions, which are temporally variable, onto forage production estimates to predict percentage utilization across the landscape. Even if the equid distributions are coarse or estimated, they represent what is known.
- Use spatial modeling of equid habitat selection on a seasonal basis to provide estimates of equid distributions. Equid habitat-selection patterns will be influenced by distance to water, topography, forage quantity and quality, shrub and tree cover, barriers to movement, conflicting land uses, forage offtake by livestock, and other factors. All those can be represented as GIS data layers.
- Use remote-sensing data to cross-check and augment estimates of forage production.
- Use spatially explicit precipitation maps that account for patchy rainfall and topographic gradients to refine estimates of forage production.
- Estimate snowpack distributions by using remote-sensing products, SNOTEL data, snowpack modeling, and spatial interpolation to estimate areas that are available to horses in winter. The snowpack in turn affects the forage supply for the horses in winter.

As just noted, various vegetation and biophysical-ecosystem models have been developed over the last 3 decades. All have capabilities of simulating realistic scenarios of plant production and vegetation dynamics in response to soils and climate. However, few have focused on simulating vegetation or ecosystem responses to herbivory. Few have explicitly represented herbivores or their dynamic distributions on the landscape. However, one example that does is the application of the SAVANNA ecosystem model to the Pryor

Mountain Wild Horse Range (Coughenour, 1999) and to a variety of other large herbivore ecosystems in the western United States, East Africa, and elsewhere.

To be useful in informing and assessing AMLs, key capabilities of such an ecosystem model would include

- Prediction of plant-biomass dynamics and production responses to climatic variations and soils. Dynamics must be represented at least seasonally and ideally on a weekly or even daily basis. Dry, wet, and average years should be realistically simulated. Seasonal dynamics are important because forage biomass varies greatly owing to intraseasonal and interseasonal precipitation patterns and herbivore off-take on different parts of the landscape at different times throughout the year.
- Realistic simulation of plant-production responses to herbivory, including undercompensatory and overcompensatory responses.
- Simulation of changes in vegetation cover over multiyear periods.
- Differentiation of simulated plants into functional groups, including preferred and nonpreferred species for herbivores.
- Representation of spatially variable patterns of precipitation and temperature and their effects on vegetation. Spatial patterns of precipitation can be thought of as dynamic precipitation maps in the model.
- Simulation of dynamic snowpack distributions across the landscape because these affect forage availability and herbivore distributions.
- Simulation of dynamic herbivore habitat selection and resulting spatial distributions in response to water, forage, topography, cover, and barriers.
- Simulation of herbivore forage intake and resulting effects on herbivore body condition.
- Representation of key nutrient cycles, particularly nitrogen and soil-carbon dynamics.
- Representation of key hydrological responses, particularly runoff and infiltration responses to changes in vegetation cover, which may result from herbivory.
- Simulation of interactions with other species via competition for forage, water, and habitat and effects on other species resulting from equid-induced habitat alterations. Ecosystem modeling can represent forage competition, and effects on habitats could be represented by linkages to habitat models for other species.

With those modeling capabilities, it would be possible to predict the effects of different horse or burro densities and distributions on ecosystem dynamics and to assess whether horse or burro densities are sustainable in the long term. It would also be possible to infer or directly represent interactions with other species, including wildlife and livestock. Competition between livestock, wildlife, and horses or burros is affected by the degree of overlap in species forage preferences and spatial distributions. Modeling could also be used to assess the effects of restrictions on horse or burro movements that arise from fencing and other land uses. Such habitat fragmentation results in reduced opportunities for herbivores to access key grazing areas in times of food shortages on primary ranges. Restrictions of movement can also result in higher herbivore densities and grazing pressures than would occur if the animals could disperse or migrate. Vegetation or ecosystem models must be verified through comparisons with monitoring data described above. It is recognized that no single model is completely accurate; however, iterative adjustment of a model on the basis of data will improve it and make it more useful.

Adaptive Management

Environmental variability and change, changes in social values, and the discovery of new information require that AMLs be adaptable. Perhaps the most fundamental approach in this regard is adaptive management (Holling, 1978; Williams et al., 2009). Adaptive management can be used in a variety of social decision-making settings (see Chapter 8). Herrick et al. (2012) defined adaptive management as an iterative decision-making process that incorporates development of management objectives, actions to address the objectives, monitoring of results, and repeated adaptation of management until desired results are achieved. A key tenet of adaptive management that is relevant to managing free-ranging horses and burros is the treatment of management actions as testable hypotheses. In turn, maximizing long-term knowledge of the system and thereby improving management (balanced with achieving optimal short-term outcomes, given current knowledge; Stankey and Allan, 2009) hinges on several fundamental tenets of research and monitoring design. Those tenets include use of control plots (against which to evaluate the effects of a given management “treatment,” such as erecting exclosures, administering immunocontraception broadly in a population, or removing or transferring animals from a population); use of replication to increase confidence that results are generalizable rather than anomalous; and controlling for variability (such as that due to annual differences in precipitation and thus productivity), for example, through Before-After Control-Impact designs (Underwood, 1992, 1994). Also essential for adaptive management specifically and for applied ecology generally is the explicit incorporation of uncertainty (such as the use of 95-percent confidence intervals, standard errors or standard deviations, and probability density functions) into estimated measures (such as herd size, utilization rate in a site or HMA, and average penetration resistance in a landscape).

Several other approaches to analysis and interpretation of management actions and monitoring data can improve confidence in the results. First, if there is interest in understanding whether or how a particular factor (e.g., average site growing-season precipitation) affects the degree of ecosystem alteration caused by a given density of free-ranging horses and burros, ecosystem attributes mentioned above should be measured at numerous sites with comparable horse and burro density across a broad range of that factor (gradient analyses; Austin, 1985; Gosz, 1992). Such approaches provide quantitative information on the major driving variables, permit the generation of information for extrapolating between sites and across scales, and begin to address mechanistic explanations of phenomena relevant to management (Gosz, 1992). Although ideally other important factors would remain constant in all sites along the gradient, that is rarely the case; for example, soils may differ markedly along the gradient. In those situations, explicitly accounting for this key factor (e.g., soils) can be approached in a manner comparable with complete factorial or blocked designs (e.g., Underwood, 1994, 1997; Sokal and Rohlf, 2012). A related example might be the use of landscape-scale analyses to identify portions of the landscape most likely to be early-warning indicators of deterioration of landscape condition, such as areas of heavy use.

Numerous relatively recent advances in ecological monitoring that can further increase confidence in results are relevant and noteworthy for the Wild Horse and Burro Program. For example, if a particular question is being addressed in terms of testing of the null hypothesis and the null hypothesis fails to be rejected (that is, no effect of a management action or “treatment” was found), a post hoc power analysis can be performed to assess how likely the effort was to detect an existing effect (what power the effort had) given the sample sizes used for and the variability among replicates in the various groups. Over time, however, a priori power analyses have generally come to be regarded more favorably than post

hoc analyses. A priori analyses can tell managers and researchers what level of effect size (i.e., only if a 50-percent difference exists) can be detected for given levels of power, sample size, and variability within groups. BLM managers should note that the error structure (the partitioning of degrees of freedom) in these analyses reflects the design of their monitoring. In more complex designs, simulation analyses can be a more realistic alternative. Concepts related to power can improve setting and adjusting of AMLs by providing quantification of sensitivity of a monitoring system, that is, the ability to be an early-warning system of environmental change as opposed to confirming that a system has already been dramatically altered and perhaps crossed an ecological threshold.

The committee believes that the above principles could be more thoroughly integrated into the Wild Horse and Burro Program to increase the defensibility and scientific validity of management actions. Generally speaking, when the domain is as spatially vast and biotically heterogeneous as the area managed by BLM for free-ranging equids, a compromise approach can be taken. The compromise seeks to balance the incorporation of as much repeatability as possible (to permit analyses at numerous hierarchical spatial and temporal scales) with the ability to tailor management and monitoring efforts to local biota, interests, and priorities (to allow stakeholder involvement and investment and have relevance on both local and broader scales). That may mean, for example, that a core suite of field methods and monitoring indicators are used and that databases and analysis templates exist for all HMAs (Box 7-4). In contrast, individual HMAs or district offices may add to the core suite by creating standard monitoring approaches for monitoring locally important rare plants or animals or may add additional metrics for a given field method that are important to local interest groups.

Validity for Stakeholders

Because AMLs are a focal point for controversy, it is important to develop and maintain standards for transparency, quality, and equity in the establishment, adjustment, and monitoring of AMLs. Research suggests that transparency is an important contributor to the development of trust between agencies and stakeholders (Rowe and Frewer, 2000; Webler and Tuler, 2000). The public should be able to understand the methods used and how they are implemented and should be able to access the data used to make decisions. Transparency will also encourage adherence to a high level of quality in data acquisition and use. The data and methods used to inform decisions must be scientifically defensible. Allocation of resources to management of free-ranging horses and burros takes place in a context of contending uses for BLM lands, all of which have some standing in the agency's charge for multiple-use management. The law makes clear that rangeland resources are to be protected from deterioration, but there is no known formula for creating a balance among such uses as cattle grazing, wildlife, hunting, mining, recreation, and free-ranging horses.

From submitted public comments and statements made by members of the public at information-gathering meetings, it is clear that stakeholders vary in their opinions about AMLs. Some believe that herd numbers should be higher and should take precedence over other rangeland uses administered and managed by BLM. Some believe that equid population size needs to be increased to protect genetic diversity or to ensure survival of the herds in an unpredictable environment. Some believe that herd levels are too high or that AMLs are not adequately adhered to and that free-ranging horses and burros are damaging habitat and taking resources away from other uses. Some argue that HMAs should be managed exclusively or primarily for horses and that other uses should be considered secondarily or excluded from allocation of forage and habitat resources. Different ideas about

BOX 7-4**Development of a Comprehensive Monitoring Strategy**

BLM's 2011 report *Assessment, Inventory, and Monitoring Strategy for Integrated Renewable Resources Management* (BLM, 2011), also known as the AIM strategy, is part of a laudable effort to standardize and improve monitoring and assessment agency-wide. The strategy will help considerably with the transparency of how AMLs are set and adjusted, and the committee strongly supports the effort. As the document states, "the AIM Strategy is intended to reach across programs, jurisdictions, stakeholders, and agencies to provide data and information valuable to decisionmakers." The type of data to be acquired is described as follows:

To effectively manage renewable resources, the BLM needs information at multiple scales about resource extent, condition and trend, stressors, and the location and nature of authorized uses, disturbances, and projects. Acquiring and assessing this information will be accomplished through the integration of several fundamental processes, including the: (1) development and application of a consistent set of ecosystem indicators and methods for measuring them (i.e., core quantitative indicators and consistent methods for monitoring); (2) development and implementation of a statistically valid sampling framework; (3) application and integration of remote sensing technologies; and (4) implementation of related data acquisition and management plans (e.g., Geospatial Services Strategic Plan, Enterprise Geographic Information System architecture, and rapid eco-regional assessments). (BLM, 2011, p. 1)

The AIM strategy is based on the premise that a few carefully evaluated integrative indicators can be used to monitor complex ecological processes. Herrick et al. (2012) evaluated how to integrate such monitoring into a "holistic strategy for adaptive land management." The report points out that monitoring cannot be separated from its objectives and that processes to be monitored include driving processes, short-term responses, and long-term responses. In the context of free-ranging horses and burros, short-term indicators of management effectiveness would include vegetation measurements to learn whether offtake levels are as predicted and to see whether the horse and burro populations are within the bounds of AMLs. Long-term indicators would include measures of vegetation composition and cover, soil fertility and hydrological properties, and riparian ecosystem functioning. Monitoring must always include climate; it is the foremost driving variable because it occurs outside the realm of management but affects system dynamics. The set of indicators used in the AIM strategy should be reviewed for their applicability to the objectives of the Wild Horse and Burro Program.

The committee recognizes and the AIM strategy report observes that BLM has limited staff and resources and that it is therefore difficult to make complete, distributed, and recurring assessments and evaluations. The report makes suggestions for setting priorities for assessment, data collection, and increased use of remote-sensing technologies (BLM, 2011). The AIM strategy argues that "remote-sensing indicators can complement and even replace ground-based indicators where spatially and temporally consistent relationships can be established" (Herrick et al., 2012).

what constitutes rangeland health and a thriving natural ecological balance pervade such debates. The multiple, and often conflicting, views regarding AMLs emphasize the need for robust data and transparent processes in the setting of AMLs. Data and transparency will of course not fully resolve differing public viewpoints about allocation. Chapter 8 discusses approaches to working with stakeholders.

CONCLUSIONS

Establishing and validating AMLs could involve six steps:

- Inventorying the landscape to assess the current states of the system quantitatively and qualitatively.

- Developing conceptual models and hypotheses for the processes that have led to the current states, particularly differentiating the relative roles of climate, horses and burros, livestock, wildlife, and other factors.
- Developing predictions of future changes based on conceptual and quantitative models, particularly of changes in response to alternative management practices that are hypothesized to lead to alternative desired states.
- Developing monitoring approaches to assess the success of the adopted management approach in bringing about a hypothesized, predicted change.
- Refining the models to improve accuracy and predictive power in setting AMLs.
- Providing transparent information about the data and decision-making process to stakeholders and obtaining their responses.

Essentially, this is an adaptive-management approach in that it calls for the development of a model or set of hypotheses, predictions of responses to management and environmental variables, learning from observed responses to management, and refinement of the model. It can fit a state-and-transition format.

To carry out this adaptive management process, BLM needs to solve five major challenges, which its handbook does not adequately address. Specifically, BLM should

- Increase the specificity and consistency of its protocols for establishing and adjusting AMLs.
- Develop a scientific approach to identifying objectively the constraints on equid populations and their explicit effects on the expression of natural processes under minimal management.
- Improve transparency of forage allocation.
- Manage for change and unpredictability in ecosystems and in social contexts.
- Improve the scientific validity of the concept of a thriving natural ecological balance.

Increased Specificity and Consistency

BLM should continue moving toward consistency in its protocols for setting and adjusting AMLs; repeatability is a hallmark of ecological monitoring. The BLM handbook should define terms explicitly and precisely, use them consistently, and include citations of research or methodological references in the text. An intermediate approach that achieves continuity and comparability among spatial resolutions for numerous ecological components and attributes (by using standardized methods) but allows for “stepping-down” or options in monitoring approaches to address issues or resources of local or regional concern may be an ideal compromise approach.

Direct forage-production measures should augment the inference of production from visual estimates of percentage utilization; back-calculations involving total offtake based, on equid counts, which may not be accurate; and assumed per-animal intake requirements. The use of small, temporary exclosures implemented in a spatially representative and statistically robust sampling design would provide more transparent and scientifically supported data. BLM should also develop approaches for quantitatively distinguishing horse or burro use from livestock and wildlife uses of forage, riparian areas, and other resources to verify utilization partitioning between livestock, horses, burros, and other herbivores. Table 7-2 describes various remote-sensing methods. BLM should use the ones that are applicable in monitoring and assessment for particular locations. GIS and spatial modeling

could be used to map and overlay total and percentage utilization by the different species in the landscape. The committee believes that BLM should continue to develop the AIM strategy and to participate in development of state-and-transition models for western rangelands with NRCS.

As is the case with all large herbivores, free-ranging horses and burros not only use the environment but change it, and these effects need to be considered in assessment of AMLs. Effects of trampling and concentrated use on soils, insects, small mammals, and plants should be monitored in addition to forage consumption. Given BLM's multiple-use mandate, it may want to consider wider monitoring of one or more aspects of ecological condition and function that are not tied solely to equid health. Metrics related to such aspects should reflect the effects of processes that large-bodied herbivores impose on ecosystems—namely, patch creation, redistribution of nutrients via selective herbivory and later urination and defecation, compaction of upper soil horizons, and rubbing and trampling of vegetation. Although it can be challenging to measure ecological function directly, there are numerous methods and techniques for indexing ecological services, such as loss of soil by wind or water erosion; riparian-channel function; clean water; and physical structure of vegetation for perching, resting, or escape cover. Explicit attention to a reasonable subset of ecological services and ecosystem components is a good idea fiscally because conserving the potential of landscapes to remain resilient and to resist degradation may make expensive remediation, rehabilitation, or emergency recovery efforts unnecessary. Native threatened, endangered, and sensitive species require focused conservation attention. Such attention provides BLM with a mosaic of conservation elements that reflect diverse disturbance regimes, including parts of the landscape with no nonnative herbivores. Many disturbance-sensitive species seem likely to become increasingly rare, especially in the arid and semiarid landscapes of western North America that are being affected by invasive plants, climate change, and uncharacteristic fire regimes.

Water quality needs to be considered in addition to water supply in looking at availability for multiple species. Numerous methods have been developed to perform such monitoring, including ones that involve robust statistical designs, have been used specifically for grazing systems, and have been used by many local, state, and federal agencies that have diverse stakeholders (Beever and Pyke, 2004; Herrick et al., 2005a,b; Thoma et al., 2009). Consultation and collaboration with state and federal agencies charged with water quality responsibilities are necessary.

BLM should use a strategically placed network of large, long-term exclosures to quantify the long-term effects of free-ranging equids, livestock, and wildlife among HMAs, seasons, and years of different weather.

The Challenge of Minimal Management

The way that AMLs are established and adjusted ensures that population growth rate is maximized (see Chapters 2 and 3). The density-dependent and environmental constraints that would reduce population growth rate and keep a natural population in check are precluded by management removals to avoid range deterioration. In a self-regulating, food-limited system, a lack of adequate food eventually suppresses the population if predation does not (see Chapter 3), and this sometimes results in effects on vegetation, soils, and other species. Removals to prevent those effects also prevent self-regulation of the horse population and in fact may allow it to reach its maximum potential growth rate. Therefore, there is a need to predict and state explicitly the population-level outcomes of managing

for vegetation conditions that may be expected in a sustainable but differently functioning ecosystem that includes large herbivores.

A program of continuing, ad infinitum removals may not be economically sustainable or socially acceptable. However, letting horses become food-limited, having many horses in poor condition, and having horses die of starvation on the range are not acceptable to a sizable proportion of the public. The use of more benign methods to control population growth rate (such as contraception) may reduce (but perhaps not minimize) the level of management intervention while avoiding the unacceptable outcome of food limitation. Various fertility-control mechanisms are described in Chapter 4 with their consequences for population processes (see Chapters 3, 4, and 6) and genetic processes (see Chapter 5).

A scientific approach is needed to identify objectively the constraints on horse and burro populations and their effects on the expression of natural processes under minimal management. The ecosystem might look different and function differently in the presence of more minimally managed equid populations from how it does with no or markedly reduced populations, but it may nevertheless be sustainable over time. Such a scientific approach would provide a more solid justification of management interventions. For example, the anticipated effects of different equid densities on vegetation and rangeland ecosystem functioning should have a scientific basis. Likewise there should be a basis for assertions that barriers to dispersal or barriers to access to critical habitats preclude natural processes; and the assertions should be explicitly described and justified for a specific HMA on the basis of an understanding of how ecosystems would function with large herbivores and minimal management. Ideally, from a research standpoint, such questions would be addressed in a replicated spatial mosaic in which some herds or areas would be allowed to self-regulate and others would be managed as they are currently being managed.

Allocation versus Assessment

Transparent processes for allocation should be developed, such as participatory adaptive approaches. Participatory approaches are discussed in Chapter 8.

Managing for Unpredictability

The committee examined traditional pastoral systems adapted to arid ecosystems. BLM is charged with using “minimal” management for free-ranging horses and burros, so extensive pastoral systems adapted to arid rangelands that use little or no supplemental feeding, energy, and physical infrastructure might offer some insight into how to manage free-ranging equids. Traditional pastoral systems emphasize mobility, flexibility, and reserves (Oba et al., 2000). Mobility is the movement of animals from one area to another on scales from the local to across biomes; flexibility is being able to adjust boundaries, herd sizes and components, and timing and patterns of mobility. Reserves are areas that are grazed only during extreme events. The origins of those practices owe much to the natural movements and behaviors of free-ranging herds. Can BLM use this information in developing strategies for coping with the unpredictability of arid rangeland environments?

How much and within what kinds of bounds in nonequilibrium environments grazing influences vegetation trajectories is debatable; however, it is indisputable that there is great unpredictability in forage production and that grazing management cannot reduce it (Vetter, 2005). BLM’s system of calculating forage availability without including years of high production attempts to adjust for this unpredictability by removing high-productivity years from the calculation; however, there will always be extreme events in nonequilibrium

conditions. Even with a conservative approach, an important lesson from traditional pastoral systems is that the extreme events need to be planned for and that flexibility in numbers, timing, and boundaries is important. From the theoretical developments in rangeland ecological dynamics, it is also known that some sites will be permanently altered by unpredictable events. There will be a constant need for adaptation, so an adaptive-management process for setting and adjusting AMLs should be explored.

In addition to intensive monitoring of grazing utilization, rangeland ecological condition and trend, actual use and climate data, using NRCS ecological site descriptions and associated state-and-transition models for horse-occupied habitat would not only help to standardize ecological information agency-wide, but it would build on substantial previous work and facilitate use of the already existing National Resource Inventory database. That would provide value to the consistent investment by BLM that is needed at this time.

Ecological site descriptions are land-classification systems that identify and stratify lands on the basis of soil-, climate-, and herbivory-influenced ecological potential and ecosystem dynamics. State-and-transition models are included in individual ecological site descriptions that characterize thresholds, community phases within states, and irreversible transitions that degrade ecological processes and lead to alternative states (Stringham et al., 2003). In fact, BLM has already recognized the need to develop such models for BLM lands in its 2011 AIM monitoring strategy. Conceptual ecological models based on science and other expert input are being developed to provide a common language that addresses ecosystem sustainability, a means of identifying indicators of key ecosystem attributes, and a basis for resource decisions predicated on maintaining or restoring ecosystem capacities.

Managing for a Thriving Natural Ecological Balance and to Prevent Rangeland Deterioration

If maintaining a thriving natural ecological balance and preventing rangeland deterioration are to be used as scientific justifications for setting AMLs, these goals need a more scientific basis and clear definition. Recently developed concepts that might be of use in helping to set and adjust AMLs include those of ecological sustainability (Smith et al., 1995; Turner et al., 2003; Weltz and Dunn, 2003; Mitchell, 2010) and ecosystem resilience (Carpenter et al., 2001; Walker et al., 2006; Briske et al., 2008). As those concepts are developed and tested scientifically, adopting a sustainability or resilience framework would be a marked advancement, and it would be more likely that such a framework would have a credible scientific basis.

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8

Social Considerations in Managing Free-Ranging Horses and Burros

This chapter focuses on the Bureau of Land Management (BLM) request for guidance on addressing divergent and conflicting perspectives about free-ranging horse and burro management and on considering stakeholder concerns while protecting land and animal health.

BLM is obliged to manage free-ranging horse and burro populations in a way that satisfies the requirements of the Wild Free-Roaming Horses and Burros Act (P.L. 92-195). In making decisions about how to do so, it must also address the public's concerns and expectations under the National Environmental Policy Act (P.L. 91-190). As was pointed out in Chapter 7, the Wild Free-Roaming Horses and Burros Act leaves considerable room for interpretation of its mandates. In 1982, the National Research Council noted that public opinion was the "major motivation behind the wild horse and burro protection program and a primary criterion of management success," suggesting that control strategies must be responsive to public attitudes and preferences and could not be based only on biological or cost considerations (NRC, 1982, p. 54).

A variety of stakeholders want to participate in shaping policy and management decisions before proposed actions are taken, and there are ways for BLM to make use of their input. This chapter discusses several approaches for improving communication with the public and leveraging public participation to increase confidence in decisions about the free-ranging horses and burros under BLM management. While not repeating information easily available elsewhere, the report highlights important elements of various techniques and approaches to working with the public.

The possible approaches include conducting research to understand stakeholder values and the economics of different management regimes better; using *appreciative inquiry* to reduce the tension between polarized views; and creating opportunities for greater public participation through *structured decision-making*, *adaptive management*, and *citizen science*. The likelihood of success in improving communication, earning the support of different segments of the public, and improving management decisions will be substantially increased if the activities to engage the public are themselves planned, evaluated, and

monitored with public collaboration under the guidance of practitioners of social science with a process called *analytic deliberation*. Using those tools successfully will require BLM to make a commitment to public engagement and provide the staff and resources to enhance the potential for success.

DISPARATE VALUES RELATED TO FREE-RANGING HORSES AND BURROS

In a comprehensive study of attitudes toward animals, Kellert and Berry (1980) found that of 50 species of animals, the horse was the second-most liked animal by U.S. respondents, behind only the dog. Horses maintain immense cultural value as symbols of grace, beauty, companionship, and courage (Nimmo and Miller, 2007; UHC, 2009).

Given the complexity of issues surrounding free-ranging horses and burros, it is not surprising that Nimmo and Miller (2007) refer to them as having a pluralistic status: their bodies and behavior are sites of conflict. Various members of the public (including all those interested in or affected by a decision [Dewey, 1923]) differ in the values that they attach to free-ranging horses and burros, and some parties have strongly held perspectives on the issue (Symanski, 1994; White and Ward, 2010). In some citizen groups, horses are highly valued and beloved animals that should receive a greater share of BLM resources. In other organizations, free-ranging horses are competition for agriculture and wildlife and interlopers and stressors of fragile ecosystems.¹

Differing values and beliefs regarding the “tameness” of animals may cause some stakeholders to value them differently. The dispute regarding whether the free-ranging horse is a re-established native species was reviewed by the National Research Council (1980, 1982), but there is more recent science on the issue (see Weinstock et al., 2005). The viewpoint that the free-ranging horses are an invasive species may factor into the decision-making of those who consider them an unnatural addition to the landscape of the United States (Coates, 2006; Rikoon, 2006; Nimmo and Miller, 2007). The view of the horse as an invasive species contrasts sharply with the iconography of the horse as central to the “traditional” West and native to the North American landscape.

Scientists note that the morphology of horses—including their flexible lips, elongated head, and digestive system—make them unique consumers on the American West landscape, using resources differently from other grazers, such as cattle (NRC, 1980; Beever, 2003). Horses consume more rangeland forage per unit of body weight than their ruminant counterparts (see review in NRC, 1980). That disparity in forage consumption is argued by many stakeholder groups to cause inequitable resource allocation because calculations used by BLM to set stocking rates consider a horse to be the equivalent of a cow-calf pair in terms of forage consumption (see Chapter 7).

These conflicts illustrate why policy to manage the free-ranging population should be carefully attentive to divergent public values. It is important to have a management plan that accounts for the opinions and concerns of a variety of stakeholders—not only scientists and advocates but a variety of community members and parties that may have strongly

¹During the public-comment sessions of the committee’s meetings and in written comments submitted to the committee, it heard from representatives of such groups as the American Farm Bureau Federation, the American Society for the Prevention of Cruelty to Animals, the American Wild Horse Preservation Campaign, the Animal Welfare Institute, the Cloud Foundation, the Equine Welfare Association, the National Association of Conservation Districts, the National Cattlemen’s Beef Association, the Nevada Cattlemen’s Association, the Public Lands Council, the Western Watersheds Project, the White River and Douglas Creek Conservation Districts, and the Wildlife Foundation and from many members of the public expressing a wide variety of opinions on the management of horses and burros on public lands.

held perspectives on the issue (Symanski, 1994; White and Ward, 2010). Decisions will have to take these values into account.

It is unlikely that all the values involved can be monetized in a way that is satisfactory to all parties, so use of economic policy tools such as benefit-cost analysis and contingent valuation, although potentially informative, is not able to resolve value differences fully and is not adequate to support decisions. In particular, a vocal, mobilized segment of the public argues that the free-ranging horse and burro population has the right to exist because the animals have intrinsic value. It considers free-ranging equids a “cultural service,” and such services are notoriously hard to monetize (NRC, 2005; Reid et al., 2005; Chan et al., 2012). Beever and Brussard (2000) note that managers often cannot satisfy all interest groups, but they can help to shape public attitudes if they communicate research findings transparently.

However, the flow of ideas should not be unidirectional, from scientists to the public. It is important to recognize that values are the lens through which the public views scientific issues related to free-ranging horses and burros. Values come into play in creating conflict, for example, where the economic and regulatory environment determines in large part whether a species is considered a “pest” or a “resource” (Zivin et al., 2000) or “feral” or “native,” with all the attendant implications for management (Box 8-1). Conflict can also emerge with uncertain information or poor management performance. For the public, the priority that BLM gives to free-ranging horses and burros on federal lands, relative to other uses, reflects the values of BLM.

For example, some members of the public, arguing that horses should be treated as a native species, point to recent molecular genetic evidence showing that today’s free-ranging horses are similar to the native horses that roamed North America before their extinction more than 7,000 years ago (Weinstock et al., 2005). Others say that they are domestic in that U.S. free-ranging horses descend from European stock and cannot be considered “native” because the complex of animals and vegetation has changed since horses were extirpated from North America. Whether the split between the ancient and modern lineages is sufficiently old for them to be considered two species still needs to be clarified (B. Shapiro,

BOX 8-1

Management of Animals Perceived as Both Wild and Feral

Polarization of opinion on the value of particular species has been demonstrated in community debates concerning the management of deer (Wright, 2009), feral pigs (Zivin et al., 2000), buffalo (Albrecht et al., 2009), feral cats (Lloyd and Miller, 2010), and free-ranging horses (Rikoon, 2006). The differing public opinions regarding the management of particular species, especially those considered to be feral, have inspired resource managers to adopt innovative approaches to managing wildlife populations. *Feral* describes animals that are wild but descended from domesticated stock. Recreational hunting has been proposed to manage feral pigs (Zivin et al., 2000), and initiatives to trap, neuter, and return feral cats are common across the United States (Lloyd and Miller, 2010). In each of those examples, the cultural role of a species in a given society is a factor in how individual animals are treated and managed, and different cultures have different views on management. Taking careful account of those views acknowledges that policy should inevitably be based on both scientific evidence and human values. As Bhattacharyya et al. (2011) noted, the debate over whether free-ranging horses are wild or feral is highly complex and involves a wide variety of issues, including the behavioral and physiological traits of different horse populations, their effects in different ecosystems, and disparate human values and perceptions of nature.

Pennsylvania State University, email communication, August 23, 2012). However, a more pertinent set of questions is related to whether the distinctions should matter and, if so, how in the management of free-ranging horse and burro populations.

Acquiring a better understanding of such perspectives and their implications for management policy was recommended by previous National Research Council reports (1980, 1982) that addressed BLM's Wild Horse and Burro Program. The reports highlighted the need for research into the social context for free-ranging horse and burro management, including a recommendation to fund studies that would evaluate what aspects of free-ranging horses and burros were most important to the public.

The 1980 report addressed social considerations. That report noted the lack of empirical data on public attitudes about free-ranging horses and burros or on the relative values associated with free-ranging horses. That committee noted one study by Rey (1975), who surveyed recreationists and other resource groups in the Pryor Mountains area regarding wildlife and the benefits associated with free-ranging horses. It also noted that other socio-political analyses had been written (see Appendix C of the 1980 report). That committee recommended research projects (a sentiment echoed in the 1982 report) to provide a base of socioeconomic and political data to facilitate decision-making in connection with equid management. Suggestions for research, listed by priority, were the following:

- Taxonomy of values and benefits of free-ranging horses and burros.
- Costs of free-ranging horse and burro management alternatives.
- Economics of management alternatives drawn from proposed research programs.
- Public preferences for alternative management and control strategies.
- Analysis and evaluation of demands for excess free-ranging horses and burros.
- Nonmarket values of free-ranging horses and burros.
- Public attitudes, behaviors, and knowledge regarding free-ranging horses and burros.
- Conceptual development of public-rangeland management models. (NRC, 1980)

It is unfortunate that BLM did not conduct this suggested research because a better understanding of the knowledge and values that frame public opinion about free-ranging horses and burros would give BLM managers insight and possibly help them to find more ways to bring polarized groups into a deliberative process. Such research is needed to help BLM design constructive opportunities for public participation in BLM's decision-making process—a key to gaining public support for free-ranging horse and burro management.

When ecological science is combined with social science, an ecologically and socio-politically sound management program is possible (Nimmo and Miller, 2007). The preceding chapters in this report and earlier reports by the National Research Council make it clear that decisions regarding the management of free-ranging horses and burros should draw on the best available scientific information. It is equally clear that scientists and managers will continue to make decisions despite unanswered questions and a high degree of uncertainty. For example, the effects of climate change on horse and burro habitats cannot be projected with certainty. Even as substantial effort is being allocated to “downscaled” climate models that will improve projections at scales useful for ecosystem management, uncertainty in projections of key parameters will persist (White and Ward, 2010). Fertility control also presents uncertainty. What is the timeline for a longer-term fertility-suppression drug to be developed and made available to BLM? Additional information is needed about how the various fertility-control treatments affect horse social behaviors and interactions,

in addition to information about how the drugs are administered, in order to improve understanding of how fertility-treatment outcomes might compare to those from gathers.

One possible method to gather the latest information from experts and to focus it on a particular problem is to use a Delphi process. This process involves iterative engagement with experts via anonymous surveys or group meetings (Webler et al., 1991). The eventual outcome is a summary of agreement among the experts that has been steadily developed over the course of the process (Dietz, 1987a; Rowe and Wright, 2001).

As more is learned and uncertainty is reduced, will it reduce controversy about management strategies? Without understanding the reasons for differing values and coming to grips with why different publics see things in different ways, it will be difficult to build broader support for management decisions. The remainder of this chapter discusses ways of engaging the public in decision-making so that polarization can be reduced and BLM can formulate plans that draw on the research, experience, and values that are essential to informing decision-making. In order to create more socially and ecologically sustainable approaches to free-ranging horse and burro management, it is necessary to increase public acceptance of and confidence in BLM management decisions by engaging the public in a clearly articulated and transparent process of public participation and decision-making.

THE CASE FOR PUBLIC PARTICIPATION

During the committee's information-gathering sessions, some individuals and groups provided comments to the committee that expressed a lack of confidence in BLM management, some using the phrase "managing to extinction" to characterize the agency's attitude and some taking issue with the agency's transparency, whether in reporting accurate numbers of horses that are on the range, projecting reproduction and population growth, describing the underlying rationale for the development of appropriate management levels (AMLs), reporting the effects of roundups on animal welfare, managing the health of horses in captivity, or assessing the physiological and behavioral effects of different contraceptive approaches. Some of those issues involve scientific information examined in the preceding chapters of this report, in which the committee found varied completeness, consistency, uncertainty, and transparency (Box 8-2). Left unaddressed, or at least unacknowledged, such shortcomings in the scientific information used for management undermine confidence in agency decisions, especially when it seems that efforts are made to reduce the visibility of the knowledge and information gaps.

Attempts to resolve conflicts in which values and opinions about land management are polarized often turn to principles of community-based public participation and engagement in decision-making. Slocum and Thomas-Slatyer (1995) argued that communities need to be empowered to participate in decisions that affect them because they have

BOX 8-2 Transparency

Transparency involves openness, communication, and accountability and is important in building trust and relationships with the public. Considered essential to effective public participation, a transparent process ensures continuing communication and public access to information and is critical from the earliest through the final stages of the process (NRC, 2008).

knowledge relevant to the solutions needed. Free-ranging horse populations are situated in specific geographic locations, and it is necessary that local communities that interact with the animals or are affected by management decisions be represented in some way in the decision-making process, along with nonlocals, including national lobbying groups. A community-based approach can incorporate science, the mass media, and public opinion into the decision-making process, and this facilitates a deeper understanding of the issue at hand. However, although public participation and engagement are popular phrases in policy discussions, they have not always been implemented in ways that enhance knowledge and public support. Effective public participation can be identified by the degree to which consensus is able to emerge from the gathering, sharing, and processing of pertinent information by and with all the relevant parties (Rowe and Frewer, 2005).

The literature provides numerous examples of effective engagement of public values in making natural-resources policy decisions. The next section begins with a review of public engagement in framing plans for managing free-ranging horses in the United States, Australia, and New Zealand, and then discusses the use of specific processes to engage the public in wildlife management.

Studies of Public Participation in Management of Free-Ranging Equids

In a study of public engagement in management of free-ranging horses in Australia, Chapple (2005) discovered that when top-down management systems and aerial culling were imposed on free-ranging horses, there was a lack of community support. The author found that the role of expert scientific advice was insignificant in the decision process (a policy ban on aerial culling was instituted contrary to scientific recommendations) and that there was a low level of commitment to community involvement that alienated community members. In addition, community forums did not adequately respond to community concerns.

Nimmo and Miller (2007) conducted a comprehensive review of the human dimensions of management of free-ranging horses in Australia, New Zealand, and the United States. They noted that no studies of the human dimensions of managing free-ranging horses appeared in the peer-reviewed literature at the time of their writing, although horses had been the focus of some “gray literature” social research. That literature included the results of opinion surveys in a number of locations, including Kellert and Berry’s 1980 survey. In 1997, free-ranging horses were considered pests by 13.6 percent of survey respondents in Victoria, Australia (Johnston and Marks, 1997); by 2005, that number had risen to 21 percent (Nimmo, 2005). In the same study, 50 percent of respondents indicated that aerial culling was “never acceptable” and that alternative (nonfatal) methods were preferred. Most of those surveyed by Fraser (2001) responded that they would like to see free-ranging horses in the New Zealand countryside. Finch and Baxter (2007) found that most Queensland respondents thought that free-ranging horses were not pests (25 percent) or were only slight pests (26.1 percent). In New South Wales, 40 percent of respondents indicated a desire for free-ranging horses in national parks (Ballard, 2005).

Nimmo and Miller (2007) discussed case studies in each country. They found, not surprisingly, that in the United States there has been great contention over the management of free-ranging horses. The 1971 Wild Free-Roaming Horses and Burros Act states that the horses are a “national treasure” and a symbol of the “historic and pioneering spirit of the West.” When BLM took action in 1978 (Public Rangelands Improvement Act, P.L. 95-514) to reduce the increasing numbers of free-ranging horses, the American public objected (Symanski, 1996).

In Australia, the Australian Conservation Commission of the Northern Territory (now the Parks and Wildlife Commission of the Northern Territory) offered to assist pastoralists who wanted free-ranging horses gone from their land when it discovered that free-ranging horse populations had reached over 200,000 in the mid-1980s. However, animal-rights organizations around the world objected, and the International Court of Justice for Animal Rights tried and convicted members of the Australian government for the massacre of horses (International Court of Justice for Animal Rights, 1987; Symanski, 1994). Eventually, a government report concluded that reducing horse populations was most effectively accomplished by aerial culling, but that this course of action, and any management plan for horses, needed to involve all interested parties (Dobbie et al., 1993). The targeted shooting of animals was supported by the Australian Veterinary Association (AVA) at the time, which deemed shooting acceptable as a last resort option. AVA stated that only trained, licensed marksmen familiar with horse anatomy should take part in well-regulated culls (AVA, 2002). The culling of 600 horses in New South Wales in 2000 resulted in an outcry from citizens and social groups, as there were reports of inhumane practices (Reuters, 2000) and interested parties were not adequately consulted in advance (Berman, 2011). The cull occurred in an area of habitat that AVA said was not suitable for aerial culling and was one of the largest removals that had ever been conducted. Since then, additional methods of managing the horses have been explored, including passive trapping and rehoming (adoption). The Australian management agency formed a working group to involve local communities in management decisions about free-ranging horses.

In New Zealand, the southern Kaimanawa Mountains hosted a small population of free-ranging horses in the early 1980s. Because of their low numbers (under 200), the horses were given protected status, and over the next decade the population grew to an estimated 1,100. Concerns about deteriorating range health caused by the growing horse population led to the formation of a working group that amended a management plan. Aerial culling was one of the management methods included in the plan, but it engendered public opposition. The New Zealand government compromised and, in place of aerial culling, implemented a gather and adoption plan. The first year saw over 1,000 animals removed; some were adopted, and others were slaughtered. Since then, the program has removed about 100 animals each year, most of which have been adopted out successfully.

Bureau of Land Management Processes for Engaging the Public

There is a continuum of potential levels of participation in decision-making processes, ranging from simply informing stakeholders to sharing decision-making authority with them (Figure 8-1). BLM tends to operate in a consultative manner, midway along the continuum. Although public participation in federal land management is mandated by the National Environmental Policy Act of 1969 (NEPA), the law has been interpreted to mean that the agency must inform the public and listen to comment (Moote et al., 1997).

NEPA requires that “all federal agencies involve interested publics in their decision-making, consider reasonable alternatives to proposed actions, develop measures to mitigate environmental impacts, and prepare environmental documents which disclose the impacts of proposed actions and alternatives.”² The agency publishes an environmental impact statement or an environmental assessment showing what the environmental effects

²National Environmental Policy Act. Available online at <http://www.blm.gov/wy/st/en/info/NEPA.html>. Accessed February 19, 2013.

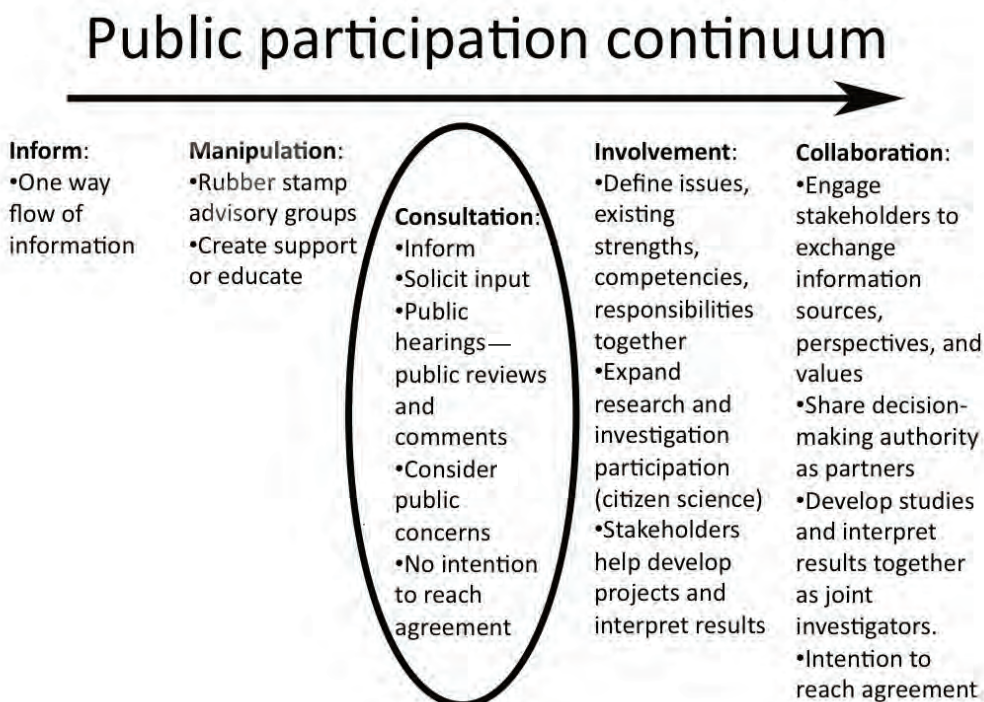


FIGURE 8-1 Types of public involvement in agency decision-making.
SOURCE: Adapted by A. Sulak from CEQ (2007) and Germain et al. (2001).

of a proposed action will be or showing “no significant impact” and requests public comments and information.

BLM can consult with the public in many different ways within the confines of the Federal Advisory Committee Act (FACA) of 1972 (P.L. 92-463) and the Administrative Procedure Act (APA) of 1946 (P.L. 79-404). Under FACA, a process for establishing, operating, overseeing, and terminating advisory bodies is formalized with the goal of ensuring that advice by the various advisory committees formed over the years is accessible to the public. APA requires that agency rules line up with the U.S. Constitution and with an agency’s statutory commands from Congress. Legal scholars have argued that final decision-making authority must remain with the agency and cannot be devolved or abdicated outside Congress’s reach (Coggins, 1995, 1999; Moote et al., 1997). One study concluded that the “concept of shared decision-making is in direct conflict with federal officers’ responsibilities to Congress” (Moote et al., 1997). These restrictions have been interpreted as limiting BLM to a “consultation” model for public interaction. Whatever the participatory or collaborative model, agency personnel should be absolutely clear about the laws, regulations, and policies at play so the collaborative solution falls within acceptable legal parameters (BLM, 2007).

BLM has worked to bring stakeholders into the decision-making process through advisory boards and committees, such as the Wild Horse and Burro Advisory Board, a national BLM advisory body that holds public meetings, and the Resource Advisory Councils (RACs), 29 regional and state groups that advise BLM on resource-management issues. Such entities do not make decisions but have input into them.

The Wild Horse and Burro Advisory Board meets regularly to discuss issues and to advise BLM. Board members are selected to represent various interests: free-ranging horse and burro advocacy groups, free-ranging horse and burro research institutions, veterinarians, natural-resources organizations, humane advocacy groups, wildlife associations, livestock organizations, and the general public. Board members are appointed by the secretary of the Department of the Interior and the secretary of the Department of Agriculture. Board meetings and calls for board nominees are published in the *Federal Register*.

The RACs in the western states have direct effects on horse and burro management because of their role in the development of Land Health Standards and Guidelines. These guidelines are generally used to assess whether the “rangeland deterioration” prohibited by the Wild Free-Roaming Horses and Burros Act of 1971 (as amended) is taking place. The RACs also advise BLM on other aspects of managing free-ranging horses and burros. In fact, RAC recommendations address all public-land issues, including land-use planning and recreation. According to the website for the RACs,

Each RAC consists of 12 to 15 members from diverse interests in local communities. . . . Each Council must include representatives of three broad categories: commercial/commodity interests; environmental and historical groups (including wild horse and burro and dispersed recreation); state and local government, Indian tribes, and the public at large.³

BLM has attempted to go beyond consultation to more collaborative “land use planning processes,” as described and recommended in its *Land Use Planning Handbook* (BLM, 2005). AMLs for free-ranging horses are established and maintained through a land-use planning (LUP) process, the multiple-use decision-making process⁴ that is associated with an allotment evaluation, or both processes. Appendix A of the *Land Use Planning Handbook* provides a guide to collaborative planning that states that “collaboration implies that Tribal, state, and local governments, other Federal agencies, and the public will be involved well before the planning process is officially initiated, rather than only at specific points stipulated by regulation and policy” (BLM, 2005, p. A-1). That document makes a number of recommendations and highlights the legal and political responsibilities of BLM, including consultation with tribes. It recommends inclusiveness, accountability, full disclosure of agency responsibilities and roles of the participants, and recognition of the limitations of the process.

Although the objectives of the LUP process include better decisions, improved relationships, and leveraged resources, many of the frustrations experienced by stakeholders (as described to the committee in information-gathering sessions) are related to the opacity of the sources of information that feed into the process of establishing AMLs, which undermines the transparency of the LUP process.

Finally, although volunteer and observation programs are not decision-making efforts, they do facilitate direct interaction with the public and may help to build trust and relationships with stakeholders. BLM has a volunteer program that engages the public in the adoption program in particular. Volunteers mentor those who are adopting horses, help with compliance checks on adopted horses, and help with rangeland improvement. When it is feasible for horse and human safety, the public may be invited to observe gathers.

³Resource Advisory Councils. Available online at http://www.blm.gov/wo/st/en/info/resource_advisory.html. Accessed November 20, 2012.

⁴Multiple Use Decision Process. Available online at http://www.blm.gov/nv/st/en/prog/grazing/multiple_use_decision.html/. Accessed October 11, 2012.

Methods for Successful Public Participation

Moving into more collaborative processes would be helpful in creating long-term constructive relationships with the concerned public. Although it is true that not all decisions are appropriate for collaborative processes, the committee believes that in the case of planning for the management of free-ranging horses and burros, substantive public participation is warranted because of the depth and breadth of public concern and the need for a long-term, sustainable program. In all these processes, however, the limitations on what BLM can and cannot do collaboratively should be clear to all participants from the outset.

There are a number of well-developed methods for encouraging public participation in public-lands decision-making and management. The goal is not only to reduce conflict but to improve the quality of decisions. Here, the committee reviews four methods of participatory decision-making that focus on helping the public, scientists, and managers to work together: appreciative inquiry, structured decision-making, participatory adaptive management, and analytic deliberation. The four frameworks are not mutually exclusive; many of their criteria overlap. For example, the adaptive-management model in which management is designed as an experiment could be part of any of the other three decision-making processes. After discussing the four approaches, citizen science is reviewed. There is considerable interest emerging in citizen science; it is one way for the public to participate in science as part of participatory adaptive management or any other decision-making framework.

At the heart of all the participatory processes is the fostering of the development of a shared understanding of the ecosystem, of an appreciation of the viewpoints of others, and of working relationships, which some characterize as based on trust but which the committee might argue may be based on transparency and balance of power. Some researchers have described the development of a “hybrid culture” of shared norms and values as a key to creating an effective management and decision-making process with participants of diverse backgrounds and viewpoints (Earley and Mosakowski, 2000; Sulak and Huntsinger, 2012).

Appreciative Inquiry

The contentions that often divide the public from experts can lead to resentment on the part of all involved, whether because of the perception that public participation is a hindrance to an investigation or the notion that experts consult with the public only to push an agenda (NRC, 2008). As part of a well-planned initiative, the Cooperrider et al. (2008) tenets of appreciative inquiry (AI) can be used to ameliorate some of the tensions that may arise when people who have differing opinions are asked to weigh in on a highly contested subject. AI advocates for the reframing of problem statements to focus foremost on a community’s strengths. Every project, this approach argues, should begin with appreciation of what is working well in the social system. Central goals of AI are to identify and describe the characteristics of the system that are positive and to reinforce the capability of society members as agents of change and transformation (Cooperrider et al., 2008).

Rather than initially “problematizing” the issue of free-ranging horses and burros with negative language, AI encourages members of the public and investigators to look at what is functioning well in the system and to build on existing strengths. For example, rather than focusing exclusively on the fact that there are more horses in need of adoption than there are adopters, a task force using AI may reframe the problem statement to acknowledge that thousands of horse owners in the United States have taken an active role in horse management by choosing to adopt free-ranging horses and that these adopters could

potentially be used as a resource in other aspects of the management plan. The tone and frame of community engagement can set the stage for cooperation, trust, and collaboration. AI is intended to inspire members to work within a framework of positivity and common experience and could be useful in engaging people who might have to capitulate on their views. In an AI process, Wright (2009) used “deliberative dialogue” to resolve citizen conflict around the contested issue of the management of free-ranging deer in a local community. A series of key steps were initiated to achieve deliberation: awareness and education, task-force planning and proposal development, submission of task-force proposal to public for input, presentation of task-force proposal to the city council, implementation of the plan, and monitoring of actions and plan modification. The public forums were held on three occasions, which gave residents a chance to voice their views. During the forums, citizens were urged to consider the long-term and short-term effects of each tactic in their deliberations. Wright concluded that dialogue and deliberation as problem-solving tools must be grounded in the historical and material realities of individuals as well as the situated character of local knowledge. The participants found that they could elucidate their opinions and values more effectively after the dialogue and deliberation of the forums and in turn were more able to comprehend the ideals and concerns of their peers. In short, having an improved understanding of others’ experiences can reduce conflict among stakeholders.

Structured Decision-Making

Structured decision-making is a process by which a problem is methodically analyzed and decisions are reached to facilitate the achievement of clearly defined objectives. The process is made up of simple steps that allow flexibility in problem-solving and deals directly with the issues of transparency and legal compliance. It incorporates public opinion, while maintaining a firm foundation in scientific evidence. Each component of the decision-making process—objectives, available actions, and potential outcomes—can be analyzed separately for more effective execution. This method of decision-making lends itself particularly well to complex issues that involve government agencies, public stakeholders, and the scientific community.

Berkes (2010) exemplifies structured decision-making by outlining the stages of incorporation of community participation and adaptive comanagement into environmental conservation: deliberation; visioning; building social capital, trust, and institutions; capacity-building through networks and partnerships; and action-reflection-action loops for social learning. For example, Blumenthal and Jannink (2000) documented ways to incorporate change and growth into existing program models by continuous monitoring, re-evaluation, and information collection.

In the case of management of free-ranging horses, Chapple (2005), like Blumenthal and Jannink (2000) and Berkes (2010), recommended implementing policy that can adapt and adjust to new information, feedback, and knowledge. Analysis of a management program’s effectiveness is a part of the cycle, and new data gleaned through careful monitoring can be incorporated into practice to make an initiative more effective (Kelsey, 2003; Garmendia and Stagl, 2010). Stringer et al. (2006) documented that different types of stakeholders can play key participatory roles at different stages in the management process and that multiple participatory mechanisms can be used at different stages. Although there is a demonstrated need for adaptability in participatory research, strong planning and structure ensure that adaptive measures fall within sound program designs (Von Korff et al., 2010).

Planning might include research on how to approach the next step of a discussion with the public. For example, to analyze which approaches to communication about risk would

improve decision-making, Arvai et al. (2001) had six to eight groups of seven to 10 people participate in one of two types of risk-communication workshops: alternative-focused (risk-focused) and value-focused. By comparing groups that focused on potential adverse outcomes with groups that reframed the issue with favorable outcomes, the authors determined that focusing on values led to more thoughtful discussions and better-informed decisions. Thus, the exploration, a priori, of the terms in which a problem is framed for the public discussion is a possible step in the use of structured decision-making. That is an example of how background research like that recommended by previous National Research Council reports (NRC, 1980, 1982) could help in preparation for public participation.

Because of its somewhat formulaic and hierarchical nature, structured decision-making lacks the flexibility of some other participation processes, such as adaptive management and analytic deliberation.

Adaptive Management

Holling (1978) and Walters (1986) first developed adaptive management for the stewardship of natural resources, and it has since been used for agricultural and sociopolitical issues (Lee, 1994; Stankey et al., 2005). A process that emphasizes flexibility and continual learning (Holling and Meffe, 1996; Walters, 1997), the adaptive-management framework, as originally proposed, calls for designing management actions as experiments, learning from the experiments, and adjusting management as more is learned about the system (Herrick et al., 2012). Gradually, a model or body of knowledge about a system that enables improvements in management capacity is developed. Adaptive management has been identified as particularly appropriate in the context of climate-change uncertainty (Nichols et al., 2011) and could be adapted for such situations as management of free-ranging horses and burros, in which knowledge of the complex interactions between free-ranging equids and their environment and other species is insufficient, the climatic trajectories of arid rangelands are in flux, and the annual variation in weather, forage production, and horse populations is high and difficult to predict. Chapter 7 discusses the potential use of adaptive management for examining the basis of setting AMLs. Involving the public, scientists, and managers in adaptive management is suggested as a means of creating an enhanced learning-based and research-based setting for management (McLain and Lee, 1996).

In a participatory process, stakeholders may participate in the setting of goals, design of experiments, monitoring and interpretation of results, and adjustment of management practices to various degrees that depend on the situation. Indigenous knowledge can be incorporated in an adaptive-management approach but, like scientific perspectives, needs to be tested (Toledo et al., 2003). Rather than a process of trial and error, adaptive management is ideally a hypothesis-driven exercise carried out by managers and stakeholders (Walters, 1997) who use controls and replication.

A participatory adaptive-management process for the setting and adjustment of AMLs, for example, might involve testing the effects of different herd levels on wildlife habitat. With the objective of meeting the stipulation of the Wild Free-Roaming Horses and Burros Act of 1971 (as amended) to protect wildlife, stakeholders—including scientists, the public, and managers—could decide on an AML to be tested, examine together the outcomes of monitoring (or even participate together in monitoring), and, on the basis of the results, propose adjustments of the AML. For adaptive management to be effective, objectives and hypotheses must be clearly defined. Agreed-on goals or objectives will serve as the baseline against which changes or progress can be measured (Stankey et al., 2005). As noted in Chapter 7, the explicit incorporation of measures of uncertainty into studies is essential.

Adaptive management could provide much-needed transparency for BLM's management of free-ranging horses and burros. Because it is a flexible system (Holling and Meffe, 1996; Huntsinger, 1997), it allows managers to experiment with a variety of policies and actions to determine which provide the desired management outcomes (Walters, 1997). That could be particularly useful for BLM, given the number and variety of stakeholders involved in this issue. BLM could implement "experimental" policies to determine whether they produce desired outcomes. Later, management actions could be adapted on the basis of the previous outcomes, and BLM could provide a clear view of its practices to stakeholders.

However, even complete transparency in practices and information sources will not resolve the issues faced by BLM because of fundamental differences in values unless stakeholders engage with and buy into the process. Hence, public participation is crucial in any adaptive-management process that involves free-ranging horses and burros. Recognizing that different groups bring different values and agendas to public participation, adaptive management can foster both a common understanding and acknowledgment of others' views (Fernandez-Gimenez et al., 2008) and increase confidence in the information generated.

An example of the importance of participation in adaptive management was provided by Kelsey (2003), who argued that it must be used in conservation measures to incorporate lay and traditional ecological knowledge that may not be available to scientific authorities. In a study of Canadian biodiversity, traditional knowledge was found to be underrepresented and undervalued despite its important implications for conservation. To remedy that knowledge gap, public participation and the inclusion of other stakeholders were used.

Williams (2011a) provided a precautionary note, pointing out that Gunderson (1999) reported that, for some institutions engaged in natural-resources management, history and tradition may pose barriers to implementing adaptive-management approaches that require greater flexibility and tolerance of uncertainty. Yet Williams (2011a) concluded that "utilizing management itself in an experimental context may in many instances be the only feasible way to gain the understanding needed to improve management."

Adaptive management in its original form—management as "experiments"—has also been criticized for its expense and for the length of time it takes to adjust management on the basis of field experiments (Herrick et al., 2012). Various alterations of the original model have been promoted, including "passive" adaptive management that does not require experiments (Walters, 1986; Williams, 2011b) and incorporation into a "holistic" framework (Herrick et al., 2012). The recently published Department of the Interior Applications Guide for adaptive management provides guidelines for federal agencies, including BLM, on using adaptive management (Williams and Brown, 2012).

Analytic Deliberation

For more than a decade, the National Research Council has urged an approach to environmental and resource-management problems that has come to be called analytic deliberation (AD) (NRC, 1996, 1999, 2007, 2008, 2011). AD takes its name from a hybrid of scientific analysis and public deliberation, two activities that have often been pursued as separate endeavors by resource-management or regulatory agencies but that can be mutually informing and supportive when conducted in coordination with one another. In a sense, the AD approach acknowledges that the public has a form of expert knowledge that complements and informs scientific analysis (Dietz, 1987b). The AD approach emphasizes the importance of sound science but also recognizes that there will be multiple views on

the part of the public and that the public can be skeptical of scientific analysis applied to policy and management decisions.

A substantial body of research, summarized in *Public Participation in Environmental Assessment and Decision Making* (NRC, 2008), shows that carefully designed AD processes that engage the public can substantially reduce conflict over natural-resources decision-making. In particular, that report concluded that in the case of local to regional issues, where face-to-face engagement over time is feasible, it is possible to develop highly effective processes for public participation that not only improve the quality of agency decisions but make the decisions more transparent from the perspective of the citizens involved, increasing the chances that the decisions will be supported and implemented. Many of the issues involved in horse and burro management are local to regional in scope—for instance, management techniques that are suitable for one ecosystem may not be applicable to another, and different Herd Management Areas (HMAs) will be managed for different needs and uses (U.S. Congress, 1997). Those are the types of cases in which AD has been used most effectively.

There are four principles for the design of a participatory process: inclusiveness of participation, collaborative problem formulation and process design, transparency of the process, and good-faith communication (NRC, 2008). The AD approach calls for iterative interactions between agency representatives, the public, and social-science practitioners in a shared stewardship of the participatory process itself, beginning when a problem or question to be addressed is defined (Dietz and Stern, 1998; Tuler and Webler, 1999; Webler and Tuler, 2005; NRC, 2008). In a “best-process regime,” the participants collectively identify important difficulties in or challenges to the effectiveness of the process on which they are about to embark. Challenges might include, for example, a high level of uncertainty related to the available scientific data, legal constraints on the agency, and disparate views of the participants. Box 8-3 contains a list of questions suggested for the diagnostic phase of the process to prepare a solid footing for effective participation (NRC, 2008). After diagnosis, participants collaboratively design tools and techniques for addressing or mitigating the challenges identified, whether joint fact-finding about the uncertainty of information, ensuring the airing of all views, or, in light of disparate values, seeking commonality in outcomes. Deliberative or social mapping could provide a way to assess the areas in which stakeholders hold similar or divergent opinions (Fiorino, 1990; Burgess et al., 2007) and what key issues are most important to them. With this information, outcomes can be used to inform further actions (Burgess et al., 2007). As the participatory process (in whatever format it may take) unfolds, the practitioners, participants, and agency representatives continue to evaluate the process, formally or informally, to understand whether and how well the previously identified hurdles are being overcome and to adapt or implement changes when they are needed. Using AD to shape and monitor the participatory process helps to build public confidence in the scientific analysis for those who might otherwise be skeptical or simply reject the science underpinning management decisions (Chilvers, 2007), reducing the extent to which value differences are confused with differences about facts (NRC, 2008).

The 2008 National Research Council report on public participation in decision-making developed key principles for carrying out public involvement that are particularly relevant to the social considerations aspect of the Wild Horse and Burro Program (see Box 8-4).

There is substantial literature describing the design of the analytic-deliberative process (Dietz and Pfund, 1988; Dietz and Stern, 1998; Renn, 1999; Tuler and Webler, 1999; Kinney and Leschine, 2002; Jasanoff, 2003; Webler and Tuler, 2005; Burgess et al., 2007; Chilvers, 2007). Box 8-5 describes two analytic-deliberative design recommendations that might

BOX 8-3**Diagnostic Questions to Assess the Challenges to Public Participation in a Particular Context****Questions about scientific context**

1. What information is currently available on the issues? How adequate is available information for giving a clear understanding of the problem? Do the various parties agree about the adequacy of the information?
2. Is the uncertainty associated with the information well characterized, interpretable, and capable of being incorporated into the assessment or decision?
3. Is the information accessible to and interpretable by interested and affected parties?
4. Is the information trustworthy?

Questions about convening and implementing agencies

1. Where is the decision-making authority? Who would implement any agreements reached? Are there multiple forums in which the issues are being or could be debated and decided?
2. Are there legal or regulatory mandates or constraints on the convening agency? What laws or policies need to be considered?

Questions about the abilities of and constraints on the participants

1. Are there interested and affected parties who may have difficulty being adequately represented?
 - a. What does the scale of the problem, especially its geographic scale, imply for the range of affected parties?
 - b. Are there disparities in the attributes of individual potential participants that may affect the likelihood of participation?
 - c. Are there interests that are diffused, unorganized, or difficult to reach?
 - d. Are there disparities across groups of participants in terms of their financial, technical, or other resources that may influence participation?
2. What are the differences in values, interests, cultural views, and perspectives among the parties? Are the participants polarized on the issue?
3. Are there substantial disparities across participant groups in their power to influence the process?
4. To what degree can the individuals at the table act for the parties they are assumed to represent?
5. Are there significant problems of trust among the agency, the scientists, and the interested and affected parties?
 - a. Are there indications that some participants are likely to proceed insincerely or to breach the rules of the process?
 - b. Are some participants concerned that the convening agency will proceed in bad faith?
 - c. Do some participants view the scientists as partisan advocates and so mistrust them?

SOURCE: NRC (2008, Table 9-1).

serve as a starting point for BLM, but the committee emphasizes that the details of the design should be tailored to the specific context (NRC, 2008).

Finally, three of the recommendations of the 2008 National Research Council report on public participation in decision-making are particularly relevant to the social considerations aspect of the Wild Horse and Burro Program: clarity of purpose and commitment to the process of participation, provision of adequate funding and staff for implementation, and a commitment to self-assessment and learning from experience. It is important to note that one of the most strongly argued points of that report is that the only way to develop effective public-participation processes is for the agency, practitioners, and public

BOX 8-4**Basic Principles for Carrying Out Public Involvement**

1. *Clear purpose:* The convening organization and the participants should agree on the goals and objectives, the scope of legally possible actions, and the constraints on the process.
2. *Agency commitment:* The agency responsible for the relevant decision should be committed to the process and take seriously the results.
3. *Adequate capacity and resources:* The process should be scaled to the level of resources available, but also the convening organization should make sure the resources are sufficient to run an acceptable process. Resources include more than just money; having continuity of staff is also known to be important.
4. *Timeliness in relation to decisions:* The process should be designed so that it can come to closure in time for the results to have an influence on the decision-making.
5. *Focus on implementation:* Processes should be designed to relate in clear ways to the decision. Agencies need to be clear about what they can and cannot do.
6. *Commitment to learning:* The process should be adaptable and should use mid-course formative evaluation to enable the convening organization to learn how to run a better process.
7. *Inclusiveness:* Better processes involve the full spectrum of interested and affected parties.
8. *Collaborative problem formation and process design:* People should be meaningfully involved early on to substantively shape the focus and structure of the process.
9. *Intense deliberation:* Processes are more successful when people spend more time in face-to-face interaction.
10. *Transparency:* It is better for processes to have clear objectives and purposes and for the conveners to give clear information about the way the process will unfold, opportunities to participate, and information and other inputs that are available.
11. *Have a competent discussion:* This requires having transparent decision-relevant information and analysis, attending to facts and values, being explicit about assumptions, acknowledging uncertainties, having independent reviews, and iterating between technical analysis and stakeholder deliberation.

SOURCE: NRC (2008).

participants to work together to address the diagnostic questions developed in the report to assess the situation and then follow the best process regime described in it. Thus, the committee cannot provide recommendations about the practice of public participation save to reiterate what that report says. The 1996 and 2008 National Research Council reports are explicit that the development of a specific set of operations can only be done in context because each is situation-specific.

However, given the high level of public concern regarding the management of free-ranging horses and burros, the diverse values that come to bear on the issue, and the substantial scientific uncertainty that is inevitable in dealing with such complex issues, effective public-participation practices are essential. Therefore, BLM should engage with the public in ways that allow public input to influence agency decisions, develop an iterative process between public deliberation and scientific discovery, and codesign the participatory process with representatives of the public. In addition, because there are also concerns about horses and burros among the national, not just the local and regional, public, it would be appropriate for BLM to support research by using survey methods that go beyond opinion polls to capture tradeoffs in public concerns and thus improve understanding of public perceptions, values, and preferences regarding horse and burro management.

The mixture of AD and AM can be cost-effective. It is true that sound AD and AM require a commitment of resources, but minimizing public controversy with effective AD

BOX 8-5**Examples of Specific Principles Suggested for Deliberative Policy Decisions**

Dietz and Stern (1998, p. 442) provided four main principles to be considered in conflict over biodiversity policy:

- The deliberation should involve all perspectives that can offer insights into the policies under consideration.
- The deliberation should begin early, when the policy and scientific questions are first being formulated, and continue in iteration with other forms of analysis until a decision is made.
- The deliberative process must be carefully structured so that it promotes discussion, not posturing.
- Deliberation does not need to produce a consensus or resolve all of the conflicts.

Renn (1999, p. 4) advocated three consecutive steps in a “cooperative discourse model” on energy policy and waste disposal issues:

1. Identification and selection of concerns and evaluative criteria. All relevant stakeholder groups are asked to reveal their values and criteria for judging different options. All relevant value groups must be represented.
2. Identification and measurement of impacts and consequences related to different policy options. Evaluative criteria are operationalized and transformed into indicators by the research team or an external expert group and then reviewed by the participating stakeholder groups. Once approved by all parties, the indicators are used to evaluate the performance of each policy option on all value dimensions.
3. Conducting a discourse with randomly selected citizens as jurors and representation of interest groups as witnesses. These panels evaluate and design policy options based on the knowledge of the likely consequences and their own values and preferences. Random selection ensures that all potentially affected persons have an equal chance to be included in the sample, including people with nonpolarized views which facilitates mutual understanding and consensus seeking.

and finding successful policies and practices through AM reduce costs in the long run, especially if they reduce the number and scope of lawsuits. For example, BLM could link AD and AM to figure out how to sterilize the right number of animals each year and in each location to achieve an unknown ideal free-ranging population while minimizing the number of animals gathered and put into holding facilities. The AD process could help to clarify issues of public concern while informing the public about the issues that BLM faces. Thus, AD forms the basis for designing AM experiments. After the experiments have run for a reasonable time, another AD process could be used to extract management lessons learned from the AM experiments.

Citizen Science

In recent years, public participation has moved toward more active interaction and collaboration between stakeholders and managers in research and monitoring processes (Fortmann, 2008). Joint monitoring, in which stakeholders participate in or observe monitoring efforts associated with management, has been shown to build trust and improve relationships among participants (Fernandez-Gimenez et al., 2008).

Miller-Rushing et al. (2012, p. 285) noted that members of the public have been actively engaged in scientific research for centuries (usually observing the world around them), producing “important datasets, specimen collections, and scientific insights of all types.”⁵ Citizen science expands the role of the public in scientific research, and this leads to a more informed public and enhanced scientific education and insights (Miller-Rushing et al., 2012). Henderson (2012) argued that citizen scientists need to be more fully engaged in the scientific process beyond data collection; they should be involved in the development of research projects and in the interpretation and reporting of results.

A review of citizen-science collaborative monitoring efforts concluded that they provided a focal point for resolving conflicting interests, encouraged collective learning, and raised awareness about the interdependence between human systems and natural ecology (Fernandez-Gimenez et al., 2008). Adaptive-management processes can incorporate stakeholders into decisions about research topics, monitoring regimes, and interpretation of results. Although there is no doubt that satisfying the demands of scientific rigor is challenging (Fernandez-Gimenez et al., 2008), for an issue that has been so contentious it may be worth time and effort to develop such programs for free-ranging horses and burros.

Interactive websites that allow participants to discuss issues and report observations can broaden opportunities for participation to the global level (Kelly et al., 2012). In a study of the role of the Internet in collaborative adaptive-management processes, the authors found that the Internet played an important role throughout the adaptive-management cycle by supporting communication through the dissemination of information to the public and increasing the transparency of the scientific process. The Internet also played a small but important role in public consultation by providing a forum for targeted questions and feedback from the public. In the BLM context, the Internet could be an important complement of more face-to-face local interactions. Meetings and local activities privilege some stakeholders, but the Internet can allow a more widely scattered group or those who have heavy family and work obligations to participate.

Austin et al. (2009) offered a good example of the use of citizen science to engage the public in decision-making. They used participatory GIS to give stakeholders opportunities to document deer abundance on landscape-scale maps. The method was useful in contributing to incomplete scientific knowledge about abundance data, and this informed wildlife research and management. Investigating further, Austin et al. (2010) found that the management priorities of private-sector managers of deer differed from those of private landowners. Deer caused ecological and economic damage to private property, making landowners bear a disproportionate share of the costs of deer management.

FeralScan⁶ is an online tool that allows users in Australia to map the presence of “pest” species, document movements and damages caused, and share that information with other users. At the time this report was prepared, horses were not included in the species in the program.

The use of “scout” programs has been found to enhance public engagement in free-ranging zebra conservation and management in Africa. A scout program that paid local pastoralists 2 days each week to record the number of Grevy’s zebras seen during the course of a day brought valuable income to the community, but it was observed that “just as important is the empowerment that comes from gathering the data and owning the results, whether good or bad” (Rubenstein, 2010). Similarly, scouts recruited from communities in

⁵The past, present, and future of citizen engagement in science were reviewed in a special issue of *Frontiers in Ecology and the Environment* (Vol. 10, August 2012).

⁶Available online at <http://www.feral.org.au/feralscan/>. Accessed March 14, 2013.

the Samburu District of Kenya kept records on the location, group structure, and habitat of Grevy's zebra herds. Those records were valuable for conservation planning. Scout participation also served to develop greater understanding of and a more favorable attitude toward wildlife conservation in the community. When citizens are involved in management, both agencies and citizens ideally learn to appreciate the needs and concerns of other participants.

OPPORTUNITIES FOR THE BUREAU OF LAND MANAGEMENT TO ENGAGE THE PUBLIC

BLM has involved the public in a consultative way in the past, but to move to the right in Figure 8-1 toward a collaborative process, BLM and the public must come together to work in new ways and with a new spirit. To accomplish that goal, the committee offers some specific suggestions for getting the public engaged in the decision-making processes surrounding the management of free-ranging horses and burros.

As the 1980 and 1982 National Research Council reports noted, research on a number of topics related to social and economic valuation of free-ranging horses and burros would provide a foundation for analytic deliberation and other means of public participation. BLM may have already laid some of the groundwork for the exploration of possible fronts on which to engage the public in participatory decision-making. In 2010, the BLM Office of the Inspector General noted that

In June 2010, BLM invited interested stakeholders to offer their opinions and suggestions about its "Working Toward Sustainable Management of America's Wild Horses and Burros—Draft Goals, Objectives and Possible Management Actions—June 2010" document. BLM planned to develop its strategy to find solutions that are best for wild horses and burros, wildlife, and the many other uses of the public lands by working closely with partners, stakeholders, the public, and employees to develop a strategy. In October 2010, BLM announced key findings based on the public response to the strategy development document, which included the following: many Americans continue to be passionate about wild horses and burros and their management; there continue to be very different views about how America's wild horses and burros should be managed. These include 1) focusing management on a smaller number of "Treasured Herds" on "preserves" or sanctuaries in the West; 2) reducing the AML of wild horses and burros or implementing aggressive population suppression; and 3) returning wild horses and burros to their original 1971 Herd Areas or expanding the use areas to other places on public lands, while allowing natural processes to adjust population size. (OIG, 2010, p. 12)

The differing views about appropriate management strategies offer potential platforms for the use of the approaches described in this chapter.

The 1982 National Research Council report concluded that on the basis of the available data on public attitudes toward equid management, three factors needed to be considered in designing equid-removal programs: the humaneness of the control procedure, the specificity of its effects, and its cost-effectiveness. That report emphasized that the public was especially concerned about the possibility of pain and cruelty during equid removals. The public is also concerned about the treatment of animals after removal from public lands (in adoption or under the care of BLM) (GAO, 2008). Those may be important topics around which the public could be engaged in analysis and the development of solutions. The committee suggests that BLM continue its volunteer programs in horse and burro adoption and the public observation of gathers; these actions would facilitate the agency's direct interaction with the public and may help build trust and relationship with stakeholders.

BLM could do more with how people want to feel close to the animals, such as making it possible for people to see them easily in at least one or two places. That was also suggested in the 1982 National Research Council report. It would be useful to consider a webcam set up in a few places where the animals come often. That would build on the affection that people have for the animals and give them a chance to see for themselves that the animals are there. The public might participate in some kinds of monitoring with the webcams. When it is feasible, BLM should develop ways for stakeholders to participate in research and monitoring. Interactive web technology can facilitate stakeholder participation in gathering and reporting information about free-ranging horses and burros.

Also of potential use in involving the public in the management of the free-ranging horses and burros would be reporting all equid sightings and their numbers and distinguishing markings if possible as part of the official counts of free-ranging equids. The public could provide high-quality photographs of horses to be used in mark-resight population counts as part of the official counts of free-ranging equids. It would be important that photographs be taken of both the marked (distinguishable) and unmarked (undistinguishable) horses to provide accurate count estimates, and care should be taken to avoid resighting animals that are more commensal with humans and animals that are less “camera-shy.” The image data would be most credible and valuable for BLM if photographs were automatically date-stamped and time-stamped and linked to GPS locations.

In addition, the creation of a large citizen-science network would be helpful. Cornell University sponsors the Christmas Bird Count in which people go out 1 day a year and in a systematic way count all birds that they see and send in the data. Such data are being used to see whether range changes are resulting from climate change. As the committee learned from the invited public presentations, mark-resight studies are the best way to estimate population-size changes, habitat use, and movements that potentially can connect HMAs and thus help to mitigate loss of genetic heterozygosity. They would constitute a powerful strategy for engaging the public and improving the available information. Volunteer groups have engaged with BLM and have been trained by Dr. Jay Kirkpatrick to dart horses with the porcine zona pellucida vaccine. As of January 2013, these volunteer groups treated five herds of less than 150 animals in four states (Philipps, 2012). In addition, BLM has partnered with the Nevada Department of Corrections and the Nevada Department of Agriculture to gentle and train free-ranging horses and burros for adoption.⁷

Many citizens and some scientists (see Kirkpatrick, 2010) view free-ranging horses as native to North America, and addressing this question would increase the validity of this report of BLM’s management strategy for some stakeholders (and indeed some people may decide to shelve the report for not addressing the issue). The committee suggests that convening a forum of experts on the biology and ecology behind the horse’s status as native or feral might be one way to address these issues. The forum should be open to the public so that all can listen and learn.

The management of free-ranging horse and burro populations is an issue of concern in many countries of the world and in the eastern part of the United States. BLM could provide links on its website to national horse management associations in other countries and to the National Park Service management of horses on Assateague Island, Shackleford Banks, and Cumberland Island. Access to that information would provide the American public

⁷Bureau of Land Management Saddle Horse Training Program. Northern Nevada Correctional Center/Stewart Conservation Camp. Available online at http://www.blm.gov/nv/st/en/prog/wh_b/warm_springs_correctional.html. Accessed February 13, 2013.

with a broader view of international and national equid management issues, strategies, and solutions and an improved understanding of BLM management objectives and operations.

In addition, developing and updating a public website on BLM's management of horses and burros would be valuable. The committee recommends that BLM develop and maintain such a site. Timely updating and the inclusion of public comments (and BLM's responses) would be essential to maintain good faith in the process.

Ultimately, BLM itself will have to determine which types of questions are amenable to participatory processes and can best serve the purposes of informing management decisions and increasing public confidence, although public input into the initial determination could also be useful. As noted earlier, such efforts will require a commitment to public engagement and the resources to carry out the process, which are necessary if the agency is to achieve its mission.

CONCLUSIONS

Horse and burro management and control strategies cannot be based on biological or cost considerations alone; management should engage interested and affected parties and also be responsive to public attitudes and preferences. Three decades ago, the National Research Council reported that public opinion was the major reason that the Wild Horse and Burro Program existed and public opinion was a primary indicator of management success (NRC, 1982). The same holds true today. To complicate matters, the public holds disparate values related to free-ranging horses and burros. Some groups perceive free-ranging horses as highly valued animals native to North America, icons of the Western landscape, and deserving of more BLM resources; others see free-ranging horses and burros as invasive "feral" species in competition for rangelands and stressors of fragile ecosystems. Values are the lens through which the public understanding of scientific issues related to free-ranging horses and burros is focused, and management decisions should navigate these divergent public values.

Regardless of the diversity of public opinion on free-ranging horses and burros, there is broad consensus that the current management conditions for these animals are not sustainable (GAO, 2008) and that the ever-increasing number of horses kept in long-term holding facilities should be mitigated. BLM is faced with the problem of finding and implementing a cost-effective management strategy that is based not only on the best scientific evidence but on reducing polarization and increasing public confidence in its decision-making.

The committee believes that attempts to resolve polarized public values and opinions should draw on the principle of community-based public participation and engagement in decision-making, an analytic-deliberative process that engages lay people and experts in a constructive consideration of management options. Local communities that interact with the animals or are affected by management decisions should be represented in decision-making in a collaborative process that engages the public, scientists, and managers and that fosters the development of a shared understanding of the ecosystem, appreciation of the viewpoints of others, and the development of good working relationships based on transparency and the balance of power. A forum of experts could be convened to address one of the most contentious issues among the public: the biology and ecology related to the horse's status as native or feral. The forum should be open to the public so that all can listen and learn.

The committee encourages BLM to develop new ways to engage the public in the management of free-ranging horses and burros. For example, citizen-science networks may

be used more extensively to collect data on herd population-size changes and habitat use. Other efforts tailored to local needs should be explored.

With respect to formal, long-standing participatory processes that BLM could use, the committee reviewed four—appreciative inquiry, structured decision-making, adaptive management, and analytic deliberation—and concludes that the analytic-deliberative approach is the most appropriate for use in the Wild Horse and Burro Program. Carefully designed analytic-deliberative processes that engage the public have been found to substantially reduce conflict over natural-resources decision-making, improve the quality of agency decisions, make the decisions more transparent from the perspective of the citizens involved, and increase the chances that the decisions will be supported and implemented (NRC, 2008).

The analytic-deliberative approach is particularly relevant to resolving the conflicts surrounding the Wild Horse and Burro Program because it is founded on the principles of inclusiveness of participation, collaborative problem formulation and process design, transparency, and good-faith communication (NRC, 2008). When public participation is shaped and monitored by the analytic-deliberative process, public understanding and confidence in the scientific analysis can be improved and conflict over values can be mitigated. To ensure the effectiveness of the analytic-deliberative process, BLM should have clarity of purpose and commitment to the participatory process, should provide adequate funding and staff for implementation, and should commit to self-assessment and learning from experience.

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9

A Way Forward

On the basis of its assessment of the issues contained in the statement of task, the committee concluded that tools available to the Bureau of Land Management (BLM) could help the agency to address formidable challenges facing the Wild Horse and Burro Program successfully. Using those tools would require changes in common practices, and new approaches would probably be more expensive than standard procedures in the short term. Over the long term, however, improvements may be cost-effective and help to improve the public's confidence in BLM with respect to the management of free-ranging horses and burros in the context of the agency's multiple-use mandate for public lands.

THE PROBLEM WITH "BUSINESS AS USUAL"

In its presentation to the committee (Bolstad, 2011), BLM highlighted two goals developed in response to the U.S. Senate Committee on Appropriations' 2009 demand for a comprehensive, long-term plan for the Wild Horse and Burro Program: to balance removals with adoptions and to achieve appropriate management levels (AMLs). The committee found that it may be possible to meet those program goals but not with the system in place at the time of the committee's study.

Chapters 1 and 6 stated that the program reportedly spent almost 60 percent of its fiscal year 2012 budget, or over \$40 million, caring for more than 45,000 animals that had been removed from the range (BLM, 2012). Over 30,000 of those animals, almost all horses, were in long-term holding. From 2002 to 2011, the number of horses removed from the range each year averaged over 8,000; roughly half those removed were ultimately placed in long-term holding. The continued removal of horses perpetuates a supply of animals that outstrips adoptions each year. The Government Accountability Office (GAO, 2008) concluded that holding-facility costs would "continue to overwhelm the program" if adjustments were not made; the committee concurs with this assessment. "Business as usual" practices will probably also continue to alienate interested parties concerned about the free-ranging nature of the animals and the program's fiscal sustainability.

Furthermore, as discussed in Chapters 2 and 3, the management strategy of removing free-ranging horses and burros from the range leaves the animals that remain on the range unaffected by density-dependent population processes. Thus, population growth is not regulated by self-limiting pressures, such as lack of water or forage, and this allows horse, and possibly burro, populations to grow at an annual rate of 15-20 percent. Such successful herd productivity hampers BLM's ability to keep population sizes within AMLs and affects the agency's ability to maintain rangeland health.

THE TOOLBOX

Fortunately, tools that could help BLM to tackle many of those challenges already exist. Available improvements of common management practices on the range have been reviewed in this report and, if broadly and completely implemented, could address concerns about animal welfare and program expense. More immediately, they could help BLM to respond to two chief criticisms of the Wild Horse and Burro Program: unsubstantiated estimates for Herd Management Area (HMA) populations and of the population as a whole and lack of evidence that management decisions are informed by science. Addressing those issues could help increase public confidence in the agency.

Improving Population Estimates and Informing Management Actions with Science

Consistently conducted surveys of horse and burro populations that use scientifically sound methods of population estimation would substantially increase the credibility of the numbers reported by the Wild Horse and Burro Program. Improving the methods of horse and burro surveys was also called for by the National Research Council Committee on Wild and Free-Roaming Horses and Burros in its 1980 and 1982 reports. BLM has already taken a step in that direction through its collaboration with the U.S. Geological Survey (USGS). This cooperative work has demonstrated that survey methods available to BLM can increase the accuracy and quantify the uncertainty of population estimates.

Statistically rigorous and scientifically defensible estimates of demographic parameters and population sizes of horses and burros constitute essential data for any model that could project the outcome of different management decisions. As reviewed in Chapters 3 and 6, the absence of such data limits the applicability of modeled outcomes projected by WinEquus because the input parameters used in the model are most likely based on default datasets available within WinEquus rather than on the specific population being modeled. It is unknown whether the default datasets are representative of other horse herds or even of the populations studied, given that the default parameters were estimated from data collected more than 2 decades ago. There are no representative population data on burros. Inaccurate data on demographic and management parameters and population size and structure undermine the relevance of modeling effects of management decisions. Similarly, it undercuts efforts to develop forage production estimates made using forage utilization data as recommended in the *Wild Horses and Burros Management Handbook*.

In addition to more accurate demographic and population-size data, the Wild Horse and Burro Program would benefit from a more comprehensive model or suite of models. WinEquus can capture effects of contracepting mares, changing the sex ratio, or removing animals from the range, but it cannot model the implications of contracepting males, forecast the effects of management decisions on genetic diversity, or link the effect of climatic variability on forage availability with survival and reproductive success. It also lacks

sensitivity-analysis and economic-optimization capabilities, both of which could help managers of equid populations to set priorities for management actions.

A model that captures the population-level effects of contracepting males and females could help in designing efficacious, herd-specific contraceptive treatment plans to meet management goals. According to BLM's presentation to the committee, the agency treated an average of 500 mares a year with the porcine zona pellucida (PZP) vaccine from 2004 to 2010; just over 1,000 were treated in 2011 (Bolstad, 2011). Contracepting 500-1,000 mares a year with a 2-year vaccine will not substantially lower the rate of growth of a population of over 30,000 horses. To reduce the population growth rate with contraception, a much higher proportion of the population would need to be treated in a comprehensive, strategic fashion, making use of PZP (in the PZP-22 or SpayVac® formulation) and GonaCon™ for females and chemical vasectomy for males. Recording information on the date and type of treatment applied would allow BLM to measure the success of its contraception management actions and adapt its strategy accordingly. It would also contribute to knowledge about the effects of contraception on individual reproductive success if the contraceptive is administered multiple times, on the longevity of treated mares, and on behavior in individuals, harems, or the larger population. Tracking responses to a large-scale fertility-control strategy would be particularly important for BLM to be able to respond quickly and appropriately to known and unknown side effects that may affect population or genetic health. Any information learned from analysis of management actions could be used to modify the model or models to continually improve their predictive ability and hence their utility going forward.

Another way to reduce the growth rate is to allow horses and burros to self-limit. As reviewed in Chapter 3, few scientific studies have been conducted on equid self-limitation. However, there is substantial evidence in wild ungulate populations that self-limitation will involve shortages of forage and water for the population, which will increase the number of animals that are in poor body condition and dying, either directly from lack of food and water or indirectly from increased vulnerability to disease. Although increased mortality would reduce population growth rates, it is unclear how much the growth rate would be lowered and what effect this strategy would have on the health of the rangeland and on the welfare of other animals on the range. Without further research, experimentation, and modeling exercises, it is difficult to predict mortality, body conditions of all animals, and rangeland ecological conditions at the point of horse and burro self-limitation.

An issue that is vitally important for improving the operation and the image of the Wild Horse and Burro Program is the connection of the establishment of AMLs to results of scientific research. AMLs involve policies that allocate rangeland resources among many uses of the land, but information regarding the interaction of horses and burros with the environment and other species, which informs these policies, should be robust and of the best quality possible. The committee suggests that a science-based assessment of the range and the interaction of animals with the range, consistently applied over time and among districts, could inform the establishment of AMLs more accurately. The committee could not identify a science-based rationale used by BLM to allocate forage and habitat resources to various uses within the constraints of protecting rangeland health and listed species and given the multiple-use mandate.

The committee also finds that, if AMLs remain set at their 2012 levels (Appendix E, Table E-1), contraception or self-limitation strategies may not reduce horse and burro populations to target levels. To manage horses at 2012 AMLs, horses may first have to be removed. Large-scale removal would require the public to accept gathers on a number of HMAs over a short period, probably within less than 5 years, which would be expensive.

Once horses were removed, this approach would also require the culling of thousands of animals or the warehousing of many more thousands of horses in long-term holding. If contraception or self-limitation strategies could curtail population growth rates after a large-scale removal, the costs of long-term holding would eventually decline as fewer horses were placed into these facilities and the horses in holding would eventually leave through sale or death.

In most HMAs managed for populations of burros, 2012 AMLs were exceeded. However, the total population of burros is much smaller than that of horses; in 2012, BLM reported 5,841 burros in HMAs. That number needs to be verified with appropriate survey methods, but if it is accurate, removing burros permanently from the range could jeopardize the genetic health of the total population. The burro population is more fragmented than the horse population. Burro HMAs exist in five states; no state-aggregated AML exceeds 1,500 burros; and the cumulative, program-wide AML for burros is 2,923. Translocation of burros between HMAs would need to occur more often than it would for horses to compensate for the geographic fragmentation and small size of the population. BLM may also need to assess whether the AMLs set for burros can sustain a genetically healthy total population. It is possible that a more accurate population estimate could reveal that there are already enough previously unaccounted-for animals on the range to support genetic health at the total population level. However, if more animals were needed to sustain a healthy population, burros from HMAs that are above their AMLs could be relocated to HMAs that have AMLs set for burros but few or no animals on them.

Cultivating Public Confidence

A statement that the committee heard often in public comment sessions was that the public has no confidence in the information that BLM provides about the Wild Horse and Burro Program. Skepticism of BLM's credibility applied to all aspects of the program, including population estimates and population growth rates, genetic health of the animals, consequences of population-control strategies, AML establishment, and public-land allocation to free-ranging horses and burros.

The committee acknowledges that science cannot transform how BLM is perceived by all members of the public. However, having a scientific underpinning for its decisions would help BLM to explain and defend its management actions. For example, improving the accuracy and quantifying the uncertainty of population estimates would allow BLM to respond with data to criticism about the numbers of equids that it reports on public lands. Recording information on genetics and on animals treated with contraception would strengthen input data for models and thereby increase their predictive power with respect to the effects of management actions, such as translocation and contraceptive treatment. Even in decisions that are largely policy-driven management decisions, such as the proportion of rangeland resources that should be allocated to horses or burros, science-based information about forage availability can help BLM to explain one of the constraints underlying forage-allocation decisions.

Making the data that it collects available to the public would also be an opportunity to increase public confidence that BLM could explore. For example, improving population estimates through statistically rigorous survey methods probably will not enhance public confidence in the agency unless the methods and the numbers produced by the surveys are made available to the public. The committee is aware that BLM has already taken steps toward creating such a database. Fully populating the database on a timely and routine basis and making it accessible to the public is an example of an action that BLM could take

to increase the transparency of its decisions. Another opportunity would be to include in gathering plans and environmental assessments a clear explanation of how models are used to inform management decisions. Finally, BLM districts need resources and training to develop consistently applied monitoring and allocation methods. Investment in BLM's own human capital through training, interaction with professional and research organizations, and interaction throughout the agency is needed as a foundation for improved and consistently applied methods.

Greater public participation in BLM decision-making and data-gathering could increase public confidence in agency actions, and the committee recommends the analytic-deliberative approach to engaging the public in management decisions and increasing trust through transparency. Social-science research may help to identify opportunities and improved processes for cooperation between BLM and the public. Finally, citizen-scientist reports could be used to bolster BLM-collected data on sentinel populations and rangeland conditions.

A NEW APPROACH

The committee believes that the tools suggested above would entail more intensive management of horses and burros than it observed during its review of the Wild Horse and Burro Program. The horses at Assateague Island in Maryland and at Shackleford Banks in North Carolina are not subject to the Wild Free-Roaming Horses and Burros Act (P.L. 92-195), but intensive management has proved successful on these islands. Those locations have advantages over many BLM HMAs from a management perspective in that the animals are confined to discrete spaces and the herds are small enough for each animal to be uniquely identified. Nevertheless, they stand as scientifically studied examples of how intensive management can work and what effects BLM could expect from reducing population size and implementing contraception more consistently and widely. As has been seen on Assateague Island and Shackleford Banks, fertility control can help to stabilize population size (Kirkpatrick and Turner, 2008; S. Stuska, National Park Service, email communication, November 1, 2012). Such an outcome on BLM HMAs could be achieved with intensive management if contraceptives were applied every year, as is the case on eastern barrier islands. Although more frequent gathers would be required to achieve similar results on large HMAs in the western United States, any application of contraceptives or chemical vasectomies to a large percentage of horses in a gather would reduce the growth rate and thus the number of horses that BLM would have to remove to meet management goals.

The committee recognizes that the multipronged approach of science-based tools that it is proposing would require substantial financial resources from BLM in the short term. It therefore recommends the identification of sentinel populations and HMAs. As suggested in Chapter 2, select HMAs representative of diverse ecological settings could be studied more intensively to improve assessment of population dynamics and ecosystem responses to changes in animal density, management interventions, and variation in seasonal weather and trends in climate. The results of such studies could be used to inform population and ecosystem modeling efforts for HMAs that have similar characteristics. Selecting sentinel HMAs would be more cost-effective than studying every herd, and it is a scientifically sound strategy. The committee views the population and ecosystem research conducted by USGS on the HMAs of Little Book Cliffs, McCullough Peaks, and Pryor Mountains as a step in that direction and encourages BLM to continue working with USGS and perhaps ecologists in academic institutions on the identification of and research on representative HMAs for both horses and burros.

That complex, intensive approach would substantially benefit from a commitment by BLM to support an integrated team of competent, dedicated scientists. Cooperation among reproductive experts, animal behavior specialists, rangeland and ecosystem scientists, wildlife population modelers and demographers, and geneticists would help to achieve the program's goals. By supporting such a team, BLM would be able to generate the scientific data needed to inform, explain, and defend management decisions.

Furthermore, as recommended strongly by the National Research Council Committee on Wild and Free-Roaming Horses and Burros in its 1980 and 1982 reports and by the authoring committee of this report, using social science to proactively identify issues that may cause tension with parties interested in horses, burros, and the multiple uses of public lands could help BLM to address some of the criticisms expressed to the committee by members of the public. Increasing the transparency of data used to inform management decisions would probably also improve how the agency is perceived by the public.

In the short term, more intensive management of free-ranging horses and burros would be expensive. However, addressing the problem immediately with a long-term view is probably a more affordable option than continuing to remove horses to long-term holding facilities. The committee recognizes that for over 40 years BLM has managed horses and burros in an environment in which there are often incongruent mandates and mandates not accompanied by the required financial resources, attempting to manage the land for multiple uses (including but not limited to free-ranging horses and burros), to preserve a thriving natural ecological balance, to prevent rangeland deterioration, and to respond to concerns voiced by a variety of stakeholders. Meeting those myriad, and often conflicting, demands may not be possible. At the time the committee was preparing its report, BLM districts seemed to be struggling with many of these demands independently. However, there are steps that BLM can take and, in some cases has already taken (such as its work with USGS), that could help the agency to address its mandates more successfully. Further investment in science-based management approaches and in helping districts to apply them consistently cannot solve the problem instantly, but it could lead the Wild Horse and Burro Program to a more financially sustainable path that manages healthy horses and burros with greater public confidence.

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Appendix A

Biographical Sketches

Guy H. Palmer (*Chair*) is director, Creighton chair, and Regents Professor in the Paul G. Allen School for Global Animal Health of Washington State University. Dr. Palmer's goal is to improve control of animal diseases that have direct effects on human health and well-being. With that focus, he leads global health-research programs in sub-Saharan Africa and Latin America. For his research at the interface of animal disease and human public health, Dr. Palmer was elected to membership in the Institute of Medicine and serves on its Board on Global Health. He is also a member of and serves on the Board of Directors of the Washington State Academy of Sciences, which provides expert scientific and engineering analysis to inform public policy. Dr. Palmer has been recognized with the Merck Award for Creativity, the Schalm Lectureship at the University of California, the National Institutes of Health (NIH) Distinguished Scientist Lecture, and the Sahlin Award for Research, Scholarship, and the Arts; he is a fellow of the American Association for the Advancement of Science. Dr. Palmer serves as an adviser to NIH, the International Science Foundation, the Northwest Regional Center for Excellence in Infectious Diseases, and the Bill and Melinda Gates Foundation and is on the external boards of several universities in the United States and Latin America. He received his BS summa cum laude and DVM from Kansas State University and his PhD from Washington State University. Dr. Palmer is board-certified in anatomic pathology.

Cheryl S. Asa is director of research at the St. Louis Zoo and director of the Association of Zoos and Aquariums (AZA) Wildlife Contraception Center. She is adjunct professor in the Biology Department of St. Louis University and in the Department of Forest, Range and Wildlife Sciences of Utah State University and teaches at Washington University in St. Louis. She previously worked on a Bureau of Land Management project on control of fertility in feral horses in Nevada and Oregon. Dr. Asa is a member of many professional organizations, including AZA, the AZA Contraception Advisory Group, and the Society for the Study of Reproduction. In 2005, she was coauthor of a book titled *Wildlife Contraception: Issues, Methods, and Applications* in addition to her many publications in scientific journals.

Dr. Asa received her MS and PhD from the University of Wisconsin–Madison in endocrinology and reproductive physiology.

Erik A. Beever is a research ecologist with the U.S. Geological Survey, Northern Rocky Mountain Science Center. His specializations are disturbance ecology, mechanisms of biotic responses to climate change, and monitoring in conservation reserves—all at community to landscape scales. His greatest research experience is with mammals, but he has also studied plants, soils, reptiles, amphibians, ants, birds, and fishes. Dr. Beever worked with the U.S. National Park Service as a quantitative ecologist. He is currently a member of the American Society of Mammalogists, the Society for Conservation Biology, and the Wildlife Society in which he is a past chair of the Biological Diversity Working Group. Dr. Beever received his PhD from the Department of Ecology, Evolution, and Conservation Biology at University of Nevada, Reno, specializing in grazing ecology of free-ranging horses and in patterns of persistence of mountain-dwelling mammals. In his postdoctoral research, he studied grazing ecology of free-ranging burros, horses, and livestock in various contexts across the western United States.

Michael B. Coughenour is senior research scientist at the Natural Resource Ecology Laboratory at Colorado State University. He was a joint principal investigator on the South Turkana Ecosystem Project, investigating a native pastoral ecosystem in northern Kenya. He has carried out several major modeling and field studies of grazing ecosystems and assessments of ungulate carrying capacities in Yellowstone National Park, Rocky Mountain National Park, and the Pryor Mountain Wild Horse Range. He has developed three ecosystem models that have enjoyed wide success: GRASS-CSOM, GEMTM, and SAVANNA. He has been involved in research on pastoral and grazing ecosystems in Tanzania, Kenya, South Africa, Australia, Inner Mongolia, Kazakhstan, Venezuela, and Canada and has consulted on grazing ecosystem ecology in many other locations around the world. He has carried out ecosystem modeling studies of grassland responses to atmospheric change and has worked with atmospheric scientists to develop one of the first linked ecosystem-atmosphere models (RAMS-GEMTM). Dr. Coughenour received his PhD from Colorado State University, specializing in systems ecology and nutrient cycling in southern Montana grasslands. He later studied the Serengeti grazing ecosystem of Tanzania, using simulation modeling and experimental studies to determine how the ecosystem supports the world's largest ungulate herds.

Lori S. Eggert is an associate professor in the Division of Biological Sciences of the University of Missouri–Columbia. Research in her laboratory uses the tools of molecular genetics to study wildlife species that are difficult or dangerous to study with traditional methods. By combining intensive field studies with individual-based genetic analyses, she asks questions about the ecology and evolution of species that would be almost impossible to study in any other way. Current projects include field and laboratory studies aimed at refining the methods that Dr. Eggert uses for “genetic censusing” of elusive species in the forests of Africa and Asia. Using DNA extracted from elephant dung samples, she has applied multi-locus genotypes as genetic tags for estimating population sizes and sex-specific markers to estimate sex ratios. Previously, Dr. Eggert had been a research and postdoctoral associate at the Smithsonian Institution National Museum of Natural History in Washington, DC. She received her MS in ecology from San Diego State University and her PhD in biology from the University of California, San Diego.

Robert Garrott is a faculty member in the Department of Ecology of Montana State University and director of the Fish and Wildlife Ecology and Management Program. The focus of his research is understanding the abiotic and biotic ecological processes that influence mammalian populations and communities. He works in both terrestrial and marine ecosystems and contributes to basic science and applied wildlife management and conservation through collaborations with state and federal natural-resources agencies. Dr. Garrott teaches undergraduate courses in wildlife management techniques and principles of fish and wildlife management. He received his MS in wildlife management from Pennsylvania State University and his PhD in wildlife conservation from the University of Minnesota.

Lynn Huntsinger is professor in the Department of Environmental Science, Policy, and Management of the University of California, Berkeley. She is a rangeland ecologist whose work focuses on the conservation and management of rangelands and ranching. Current studies include research on oak woodland landowners and management in California and Spain, land fragmentation and conservation in oak woodlands, and participatory management strategies. She is a team leader in the Sierra Nevada Adaptive Management Project, working with the U.S. Forest Service and state agencies to restore forest health. She continues to pursue lines of inquiry and theory that she has found useful in her work: ecological models for disequilibrium systems as tools to understand the linkages between human relationships and ecological change, work in political ecology founded on basic notions of who wins and who loses in struggles over access to natural resources, and adaptive management as arbitrator in landscape and resource management. Dr. Huntsinger is a California-certified rangeland manager. She received her PhD in rangeland ecology and management from the University of California, Berkeley.

Linda E. Kalof is a professor of sociology, animal studies, and environmental science and policy at Michigan State University and founding director of the university's interdisciplinary graduate specialization in animal studies: humanities and social-science perspectives. Her research interests include cultural representations of animals, public perceptions of wildlife, and conservation and conflict management of urban carnivores. She has published widely in animal studies, including *Making Animal Meaning* (MSU Press, 2011), *Looking at Animals in Human History* (University of Chicago/Reaktion, 2007), *The Animals Reader* (Berg, 2007), and *The Earthscan Reader in Environmental Values* (Earthscan, 2005). She edited the multivolume *A Cultural History of Animals* (which received the 2008 Choice Award for Outstanding Academic Title) and currently edits *The Oxford Handbook of Animal Studies* (Oxford University Press) and *The Animal Turn* book series (MSU Press).

Paul R. Krausman is the Boone and Crockett Professor of Wildlife Conservation in the University of Montana Wildlife Biology Program. He received his PhD from the University of Idaho in wildlife science. His professional interests lie in the study of large mammals, especially as influenced by anthropogenic factors. Projects he is conducting include those on ecology of desert mule deer in southeastern California, winter ecology of mule deer in Montana and Idaho, predator-prey relationships between wolves and ungulates in Arizona, bison use of water in Montana, caribou calving shifts in Newfoundland, use of clearcuts by caribou in Newfoundland, and diet quality of bighorn sheep during dry and wet periods. He belongs to many professional organizations, including The Wildlife Society (TWS), the Society for Range Management, and the American Society of Mammalogists. He is a fellow and honorary member of TWS and received its Aldo Leopold Award in 2006. Other awards include the Desert Ram Award from the Desert Bighorn Council and the O.C. "Charlie"

Wallmo Award from the Western States and Provinces. He has also received awards for his editing and for books and monographs from TWS. He was the editor of *Transactions of the Desert Bighorn Council*, *The Journal of Wildlife Management*, and *Wildlife Monographs* and is the editor of the TWS-Johns Hopkins University Press Wildlife Book Series.

Madan K. Oli is a professor in the Department of Wildlife Ecology of the University of Florida. He seeks to understand factors and processes that influence dynamics, regulation, and persistence of populations and to contribute to science-based management of wildlife populations. His research addresses both basic theoretical questions and practical solutions to ecological problems and uses a combination of ecological theory, mathematical and statistical models, and field data. He was granted the University of Florida Foundation Research Professor Award in 2010 to fund his projects. Dr. Oli is the author or coauthor of over 100 publications. He received his PhD from Auburn University.

Steven Petersen is an associate professor at Brigham Young University (BYU), where he teaches landscape ecology, natural-resources planning, GIS, remote sensing, and forest ecology and management. He conducts research on the spatiotemporal effects of juniper invasion on natural resources, sage-grouse habitat assessment on broad spatial scales, and the effects of free-ranging-horse distribution patterns on plant community structure. He advises graduate and undergraduate students, is the coach for the BYU plant team, and is an adviser for the range and wildlife club. He was employed by the department to teach a suite of rangeland classes including arid-land plant identification, ecophysiology, landscape ecology, and rangeland ecology and management. Dr. Petersen received his PhD from the Oregon State University Department of Rangeland Ecology and Management.

David M. Powell is a research associate at the Smithsonian Institution's National Zoological Park and associate curator of mammals at the Bronx Zoo, overseeing hoofed animals and carnivores. His research interests lie in studies of the role of dominance and subordination in animal societies. As a zoo biologist, Dr. Powell is interested in application of behavioral knowledge to management of animals in captivity with the goal of promoting captive breeding, preparing animals for reintroduction, and ensuring optimal animal welfare. He has also studied the application of captive population genetic-management techniques to wild populations. He has studied a variety of species both in captivity and in the field including feral horses, gorillas, flamingos, lions, golden lion tamarins, kori bustards, octopuses, small carnivores, and giant pandas. He is a member of the Association of Zoos and Aquariums (AZA) Animal Welfare Committee, Equid Taxon Advisory Group, Caprine Taxon Advisory Group, and Contraceptive Advisory Board. Dr. Powell also participated in the International Union for Conservation of Nature Conservation Breeding Group's Horses of Assateague Island Population and Habitat Viability assessment workshop. He received his BS in Biology from the University of Miami, and his PhD in zoology from the University of Maryland.

Daniel I. Rubenstein is chair of the Department of Ecology and Evolutionary Biology of Princeton University. His research focuses on decision-making in animals. Dr. Rubenstein develops simple mathematical models to generate predictions that can be tested with data gathered from structured field observations or experimental manipulations. Much of his recent research on the adaptive value of behavior has centered on understanding the social dynamics of equids—horses, zebras, and asses. How risks are assessed, how decisions are made, and how conflicts of interest among individuals of differing phenotypes with differing needs are avoided is the focus of his research on the control of behavior. His

latest research focuses on one such problem—the rules governing animal movements and migration—and involves the interaction of “self-organizing” behavioral movement rules, ecological information, and habitat structure on multiple spatial scales to understand how migratory animal movements respond to human-induced land-use change and how the changes in movement in turn affect population stability. Dr. Rubenstein received his BA from the University of Michigan, MS degrees from Cambridge and Oxford Universities, and his PhD from Duke University.

David S. Thain is a consulting veterinarian. Previously he was an assistant professor and state extension veterinarian at the University of Nevada, Reno (UNR). Prior to his work at UNR, Dr. Thain was the state veterinarian at the Nevada Department of Agriculture where he managed the state’s Virginia Range Estray Horse Program. While in this position he developed his expertise in techniques to manage feral horse populations. Dr. Thain’s research was some of the first to assess new contraceptive products in the field setting to evaluate efficacy and safety as well as cost-effective practical methods for maintaining viable herds without the need for routine gathers to reduce excess numbers of horses. Early in his career he was a private practitioner in Wyoming and Nevada. He received his DVM from Colorado State University.

Appendix B

Previous National Research Council Reports on Free-Ranging Horses and Burros

Unlike the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program, the committee for the 1980 and 1982 reports (Committee on Wild and Free-Roaming Horses and Burros) and the committee for the 1991 report (Committee on Wild Horse and Burro Research) were asked to develop and evaluate specific research programs and activities related to free-ranging horses and burros. In 1979, the Committee on Wild and Free-Roaming Horses and Burros was charged to develop a research program that would

- Develop data on the biology of wild horses and burros, including the population dynamics of wild horse and burro herds;
- Identify principles and procedures for managing populations of wild horses and burros in accordance with the policies and objectives of this Act;
- Develop information concerning the availability and use of forage and water resources, dietary and habitat overlaps, and other factors relevant to the determination of the number of wild freeroaming [sic] horses and burros that a herd area can sustain; and
- Provide the Secretaries of Interior and Agriculture with scientific information upon which to make the determination as to excess animals required by this Act. (NRC, 1980, pp. 13-14)

That committee fulfilled its statement of task in a three-phase study. The first phase reviewed the existing knowledge of free-ranging horses and burros and from that developed 18 research projects that it recommended that the Bureau of Land Management (BLM) pursue to fill gaps in knowledge that would contribute to the sound management of free-ranging horses and burros. In Phase II, the committee reviewed requests for proposals that were issued by BLM for research on census methods, habitat selection, range effects, comparative nutrition of range horses and cattle, pregnancy rates in horses and burros, and horse survival rates. The report published in 1982 summarized the results on the six

research topics and reiterated the necessity of a more thorough research program, as laid out in the Phase I report, to inform management decisions related to free-ranging horses and burros. The 1982 report completed the third phase of the study.

In 1985, the Committee on Wild Horse and Burro Research was asked to

- Review research on wild horses and burros completed since 1982;
- Assess the research recommendations of an earlier committee of the National Research Council in light of current issues, and update these recommendations if necessary;
- Develop guidelines to assist the BLM in contracting for additional studies;
- Monitor the progress of contracted research projects; and
- Evaluate the final reports of the research projects and prepare a final committee report. (NRC, 1991, p. 1)

That committee recommended research topics and guidelines that were based on BLM's identification of high-priority research. BLM funded research on two subjects: free-ranging horse population genetics and control of fertility in free-ranging horses. The National Research Council committee reviewed the research proposals that were submitted on those topics after a BLM request for proposals. BLM ultimately funded one project in each. The committee's report, published in 1991, reviewed the design and results of the two projects.

The study committee formed in 2011, the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program, was not asked to evaluate specific current research projects funded by BLM or to design research activities and then review the results. Instead, it was charged to use the previous reports and later relevant research to inform an independent evaluation of the science, methods, and technical decision-making approaches of BLM's management program.

COMMONALITY IN NATIONAL RESEARCH COUNCIL STUDIES ON FREE-RANGING HORSES AND BURROS

Although the Committee to Review the Bureau of Land Management Wild Horse and Burro Management Program was not tasked with designing a research program or reviewing specific research projects, its statement of task echoed many of the issues addressed in the earlier reports. Like the committee that prepared the present report, the Committee on Wild and Free-Roaming Horses and Burros examined issues related to genetic diversity, fertility control, population estimates, population growth rates, forage use, and societal opinions. The Committee on Wild Horses and Burro Research looked specifically at the results of a free-ranging horse genetics study and a project on fertility control.

Genetic Diversity

The 1980 report flagged two management issues related to the genetic diversity of free-ranging horses and burros. First, it noted that a population that can sustain itself must have enough genetic variability to survive a multitude of environmental contingencies. Genetic information could be used to determine the size of a sustaining population for a given area that had particular environmental characteristics, and populations could be managed with that size as an objective. Second, the committee recognized that there was considerable disagreement about the origins of the free-ranging herds. One position held that the horses were the descendants of Spanish mustangs. Another took the view that the

horse herds were the result of released or escaped cavalry mounts and work animals. At the time that the 1980 report was written, no data existed to answer questions about the amount of genetic variation within and between populations and the relatedness of free-ranging equid populations to domestic horses and donkeys. Therefore, the report recommended that studies be carried out to determine the genetic variation between populations of free-ranging horses and burros and the genetic similarity between free-ranging equids and domestic breeds.

The research was not carried out in Phase II of the study by the Committee on Wild and Free-Roaming Horses and Burros, but it was one of the research projects overseen by the Committee on Wild Horse and Burro Research. Blood samples were collected from nearly 1,000 horses at seven trap sites in Nevada and Oregon from December 1985 and October 1986. The objectives of the research project were to

- Assess the average and individual heterozygosity in the populations to determine if there has been loss of heterozygosity or inbreeding through genetic drift, selection, removals, or management restrictions;
- Estimate the contributions of the original wild mustangs (descendants of animals released by the Spanish) and the current domestic lineages (13 breeds) to the present feral horse populations;
- Evaluate the several populations for possible divergence in gene frequencies and for the development of population substructure; and
- Determine parentage and particularly paternity within bands to evaluate the proportion of foals sired by the dominant band stallion. (NRC, 1991, pp. 3-4)

The data showed that there was less difference between populations of horses in the Nevada and Oregon herds than there was between domestic horse breeds. It also supported the hypothesis that the free-ranging horses in that region descended from escaped or released domestic draft, saddle, and cavalry animals. Dominant stallions did not sire about one-third of the foals born in intact harem bands. There was no evidence of loss of heterozygosity in the populations studied.

Census Techniques, Population Estimates, and Population Growth Rate

The committee that prepared the 1980 report identified many problems with counting free-ranging herd populations that raised questions about the accuracy of the population estimates and about the rate of growth of free-ranging horse and burro populations.

Herds on BLM land were not counted at a consistent frequency. The frequency of counts of each herd varied between 1 and 11 years, and the number of counts conducted ranged from 1 to 18 for each herd. The herds were not counted at the same time each year, and this negated the ability to compare counts of a single herd in different years. Horse herd population size varied with the time of the year, increasing in spring because of foaling and declining in the rest of the year because of deaths (NRC, 1980). Foaling in burros can occur throughout the year, although it is largely in spring. Counts made before or after foaling in different years are not comparable. In addition, the counting method used was not standardized among herds and was not tested for robustness. Most BLM surveys sought a complete count of the animals from the air, but the ability to count animals was strongly affected by terrain, vegetation cover, and the skill of the census counter and the pilot. To address the variation and inconsistencies, the committee recommended a research project to compare the accuracy and precision of three methods: complete counts, mark-resight

estimates, and strip–transect estimates. It suggested that the agency develop a set of criteria to determine the appropriate approach for a given habitat.

Research conducted during Phase II of the study confirmed that free-ranging horses and burros were usually undercounted, particularly in areas of tree cover and dissected topography. Burros are particularly difficult to see because they tend to stand still in response to an airplane or helicopter, and their coloring does not stand out from the terrain. The 1982 report concluded that mark-resight, capture-recapture, or counting animals immediately before and after a gather would be needed to improve accuracy. It also concluded that contemporary BLM counts of free-ranging horses and burros were conservative. The committee suggested that conducting a count of a herd every 2 or 3 years would be adequate for managing populations at a specified level.

Because herd populations are affected by the rate of reproduction, the Committee on Wild and Free-Roaming Horses and Burros extensively reviewed the available literature on free-ranging horse and burro reproduction. The 1980 report examined the information available about the age at which free-ranging females first successfully foal and compared these observations with those of domestic female horses and burros. It also looked at the fecundity of domestic and free-ranging females over their life span and at how the age distribution of a free-ranging herd affects its growth rate.

The committee found that data on reproductive rates and on survival rates of free-ranging horses were insufficient and resulted in a wide range of population growth rates of herds (NRC, 1980). Burro reproductive and survival rates were also uncertain because of deficiencies in data on foaling rates, foal survival, adult survival, and the response of reproductive activity to environmental conditions (NRC, 1980).

The research funded during Phase II of the Committee on Wild and Free-Roaming Horses and Burros was not sufficient to ascertain the population growth rate of free-ranging horse and burro herds. The committee concluded that growth rates probably vary because of a number of conditions: annual variations in forage conditions due to year-to-year weather changes or longer-term changes in climate, variations in forage conditions related to equid population densities, and variations in forage conditions related to the population density of other herbivores. The committee posited that, because of those factors, population growth rates vary spatially and temporally. The 1982 report noted that more research would be needed to ascertain the relationships between variations in forage conditions and population growth rates.

The committee also investigated whether free-ranging horse and burro populations will self-limit. It noted that there was little information to demonstrate whether populations limit themselves at densities below those which would affect ecosystems or to support the theory that populations will not limit themselves until severe ecosystem damage has occurred. The committee cited a few examples in which members of a population had starved over the winter but added this caveat

We do not cite these examples to imply in any way that these kinds of severe impact are widespread or common in the wild horse and burro ranges of western United States. In fact, we have seen very few areas with heavy vegetation impacts, although we have asked the BLM to show them to us.

Our purpose here is simply to convey our impression that, while there may be some density-dependent tendencies in the demography of these equids, they do not appear effective enough to prevent populations from increasing to the point of significant impact on other ecosystem components. What population control policy this dictates depends on the management goal for any given piece of land. If the goal is solely equid management that is experimental and “natural” as possible, a *laissez-faire* approach may be appropriate. The

equids and other ecosystem components could be allowed to seek their own balance. But where the goal is a multiple-use one, as set forth in PRIA [Public Rangelands Improvement Act of 1978], and there is concern for the values of other ecosystem components, it seems likely to us that horse and burro populations will need to be limited artificially by human action to avoid undesirable effects on other ecosystem components. (NRC, 1982, pp. 17-18)

Fertility Control

The 1980 report did not advocate the use of contraception in free-ranging horses and burros because such a decision was related to policy rather than to science. However, that committee did review the research conducted on equine contraception up to that time and recommended research that could advance the use of contraception in free-ranging horses and burros. Research on a population of burros that included vasectomized dominant male burros had reported that female burros were later bred by younger males. The committee found that reversible endocrine contraception was feasible for both mares and stallions. The report noted that tests looking at the efficacy of fertility suppression in free-ranging and captive stallions over the course of a single breeding season were underway at the time of the committee's review. When reviewing the options for females, the committee determined that hormone manipulation, intrauterine devices (IUDs), and surgery could be used as methods for equine contraception. However, at that time, hormone manipulation research on female equids was in its infancy, treatments were effective for only a year, IUDs required skilled fitting and frequently became dislodged, and surgery on mares in the field posed a risk of infection and required too much time. Therefore, the committee recommended a research project that would develop a method of reproductive inhibition in mares that would be at least 95-percent effective, require only one treatment in field conditions, could last for up to 7 years, could be reversed, and would not adversely affect the health or behavior of the animals. Such research was not undertaken in Phase II of the study and remained a recommendation of the committee in its 1982 report. The 1982 report also concluded that sterilization of only the dominant stallions in a harem was unlikely to successfully control populations.

The 1991 report reviewed fertility-control results of steroid treatments in corralled and free-ranging mares and vasectomies in free-ranging dominant harem stallions. Three series of experiments were conducted on corralled mares. In the three series, 18 combinations of hormone treatments were administered to 500 mares via silicone rods. The first series of steroid implants were found to be ineffective in preventing pregnancy. The results of the other two series demonstrated greater success: some hormone treatment combinations contracepted more than 90 percent of the mares through two breeding seasons.

Two of the hormone treatments used on the corralled horses were implanted into free-ranging mares on two different Herd Management Areas (HMAs) in Nevada. Foaling rates were determined with aerial surveys. The combined foaling rate in observed mares treated with either hormone implant on the two HMAs in 1988 and 1989 was 9 percent, (22 of 255 mares) compared with 51 percent (114 of 222) of observed mares given placebos (NRC, 1991).

Dominant stallions in 20 bands in northwestern Nevada were vasectomized in December 1985, and 20 more dominant stallions were vasectomized on a less mountainous HMA in Oregon in February 1986. Aerial surveys were conducted 2 years later to observe the effects on foaling rates. The efficacy of treating only dominant stallions was questionable. Reductions in foaling rates appeared to depend not only on the vasectomized stallion but on the stability of the harem band and its isolation. Fewer foals were observed in the stable

bands on the more mountainous HMA in Nevada than on the flatter HMA in Oregon, where bands mingled more. The findings of the genetic study that one-third of foals were not sired by the dominant stallion also raised doubts about the efficacy of vasectomizing only dominant harem stallions as a fertility-control method.

Sex-Ratio Adjustment

The Committee on Wild and Free-Roaming Horses and Burros focused much of its thesis on identifying “excess” horses or burros because *excess* could be related to the number of equids that exerted detrimental effects on their own welfare, the number of equids that adversely affected the ecosystem, or the number of equids that interfered with other management objectives for public rangeland. The 1980 report’s research projects were designed to help BLM to determine what *excess* meant. It also suggested projects to assist BLM in determining the value of “excess” equids and the most cost-effective ways of managing them.

The 1982 report reviewed the merits of removing some sex-age classes from a herd to decrease population growth. The committee found that the theory had potential but that more thorough analysis of this management approach than had been conducted was needed.

Forage Utilization by Free-Ranging Horses and Burros

The Committee on Wild and Free-Roaming Horses and Burros reviewed the forage practices, preferences, and requirements of equids and reported that hardly any information existed on daily forage intake by horses or on the nutritional value of range-plant communities as relative to equid dietary needs. It also found that possible competition for forage between free-ranging equids and cattle or between free-ranging equids and wildlife species was poorly documented. Similarly, little empirical research existed on the effects of free-ranging equid grazing on range vegetation or hydrology. The committee determined that such information would be needed to ascertain whether free-ranging horses and burros can sustain themselves on the land without adversely affecting an ecosystem or to ascertain at what quantity free-ranging horses and burros should be managed to ensure a thriving natural ecological balance. The information was particularly necessary because most of BLM’s forage allocations for livestock and wildlife had been determined before the agency became responsible for free-ranging horses and burros and few forage areas for equids had been established. The committee recommended three research projects to address the information gaps on the interaction of free-ranging equids and range ecosystems.

The research conducted in Phase II of the study was an insufficient response to the committee’s call for information about the vegetation, soil, and water potential of herd areas: the number of herbivores with varied feeding types that could be carried on an area without diminishing the area’s potential; the kinds and amounts of forage required by the herbivores; and the effects of herbivores on vegetation. However, three projects were undertaken that provided some data on those topics. BLM-funded research projects examined the distribution of and habitat use by cattle, free-ranging horses, and pronghorn near Rock Springs, Wyoming; the specifics of diet selection and grazing effects on forage plants in the presence of known densities of horses and cattle in the same area; and the quantity of forage consumed by free-ranging horses compared with cows and in relation to animal size and physiological status. Many questions remained to be answered, but the research provided greater specificity as to horse diets, including variation by season and nutrient-use

efficiency, and as to horse dietary overlap with cattle. It also provided evidence that short grazing periods have fewer adverse effects on plant communities.

The committee also investigated research that had taken place since Phase I was completed that was not part of Phase II, particularly on the interaction on the range between free-ranging horses and burros and wildlife. Although the results were far from definitive, the committee found that because free-ranging horses are grazers, they generally did not compete with ungulate browsers even if they occupied the same area temporally. However, vegetation may still be adversely affected on degraded rangeland if herbivore density is high. Adverse competition between bighorn sheep and free-ranging burros seemed likely on the basis of the number of observations, but the evidence was often circumstantial. The committee recommended that conclusive research be done to determine the degree and effects of competition between bighorn sheep and free-ranging burros (NRC, 1982). It also reiterated its conclusion from the 1980 report that research on semiarid and arid rangeland needs to be conducted for 7-10 years to capture the biological and climate variation in those regions.

Societal Considerations

The committee that prepared the 1980 report recognized that little information existed about the direct costs of free-ranging horse and burro management and the indirect costs of free-ranging horse and burro management as related to other range management objectives. Range managers needed data to guide them in managing the free-ranging horses and burros in the context of these other objectives. The committee also noted that BLM should have information on the attitude of the public toward the free-ranging equids, including the public's awareness of the issue and its nonmarket valuation of the animals. The 1980 report therefore recommended six research projects on socioeconomic and political issues that included surveying interested parties and the general public for their opinions on free-ranging horses and burros. However, no requests for proposals on socioeconomic or political issues were issued by BLM after the committee recommendations. Those issues were not within the mandate of the Committee on Wild Horse and Burro Research and therefore were not addressed in the 1991 report.

REFERENCES

- NRC (National Research Council). 1980. Wild and Free-Roaming Horses and Burros: Current Knowledge and Recommended Research. Phase I Final Report. Washington, DC: National Academy Press.
- NRC (National Research Council). 1982. Wild and Free-Roaming Horses and Burros. Final Report. Washington, DC: National Academy Press.
- NRC (National Research Council). 1991. Wild Horse Populations: Field Studies in Genetic and Fertility. Washington, DC: National Academy Press.

Appendix C

Presentations to the Committee

OCTOBER 27, 2011

Presentation by Sponsor
Dean Bolstad, Bureau of Land Management

Genetic Testing of Feral Horses
E. Gus Cothran, Texas A&M University

Overview of WinEquus
Stephen Jenkins, University of Nevada, Reno

Wild Horse Management System: Population Projection and Costing Model
Charles de Seve, EconFirst Associates, LLC

JANUARY 27, 2012

U.S. Geological Survey (USGS) Science Support for Managing America's Wild Horses
Jason Ransom, USGS Fort Collins Science Center

Porcine Zona Pellucida (PZP) Vaccine for Wild Horse Contraception
John W. Turner, Jr., University of Toledo

MARCH 19, 2012

Predation on Feral Equids
Michael L. Wolfe, Utah State University

Wild Horse Population Management with Fertility Control
Allen Rutberg, Tufts University Cummings School of Veterinary Medicine

Wild Horses and Burros: Appropriate Management Levels and Social Considerations
J. Edward de Steiguer, University of Arizona

MAY 3, 2012

SpayVac® for Wild Horses: A Long-Lasting, Single-Dose pZP Contraceptive Vaccine
Mark Fraker, TerraMar Environmental Research LLC

MAY 14, 2012

Structured Decision-Making and Adaptive Management of Natural Resources
James D. Nichols, U.S. Geological Survey

Thinking Scientifically about Science Communication
Dan M. Kahan, Yale Law School

Behavioral Ecology of the African Wild Ass (*Equus africanus*) and Their Descendants the
Feral Ass (Wild Burro)
Patricia Moehlman, IUCN/SSC Equid Specialist Group

Predation on Free-Ranging Horses by Mountain Lions in Nevada
Alyson Andreasen, University of Nevada, Reno

JUNE 12, 2012

Feral Horse Management on the Sheldon National Wildlife Refuge
Gail Collins, U.S. Fish and Wildlife Service

Appendix D

Questions and Requests from the Committee¹

POPULATION SURVEY TECHNIQUES

For a representative sample of six to eight of the larger Herd Management Areas (HMAs) that have received more-intense distributional-survey effort, please provide point locations from census flights (.shp, .shx, etc.) if available.

Please summarize which techniques for population enumeration and estimation have been employed across all HMAs during the last 10 years?

If not obvious from their descriptions of the techniques, have there been any HMAs during the last 10 years where efforts have been made to analytically estimate detectability (other than the current U.S. Geological Survey research program)? If so, can you please describe.

- If BLM horse and burro specialists use a static constant as a “correction factor” for “sightability,” what is the value used if one is used, and did the value vary across habitat types within an HMA (e.g., forest versus valley-bottom, low-sage habitats) or across HMAs? What factors do wild horse and burro biologists believe most strongly affect detectability (e.g., cover type, type of aircraft, elevation flown, snow versus no snow)?

What design (or factors) were used to determine which portions of an HMA were to be flown over for aerial censuses, and did those areas (or lines) change over time?

The Bureau of Land Management (BLM) spoke about using reversible and permanent contraceptives to “maintain the health of the herd” at the first committee meeting in Reno. How does contraceptive that is reversible relate to the health of the herd? How or

¹All questions and requests were submitted to the Bureau of Land Management except where noted.

why would reversibility provide greater health, other than to increase stochasticity due to greater numbers of applications of contraception?

POPULATION ESTIMATES

Complete spreadsheet with annual sums of horses (do not include burros) for all western rangelands at some fixed point in time in BLM's annual cycle for each of the categories below.

- Total free-ranging population
- Total number removed
- Total number in short-term holding facilities
- Total number adopted
- Total number moved from short- to long-term holding facilities
- Total number 'lost' from long-term holding facilities

Complete spreadsheet with annual sums of horses (do not include burros) for each western state at some fixed point in BLM's annual cycle for each of the categories below.

- Total free-ranging population
- Total number removed

Complete spreadsheet with the number of animals of each age-sex category removed from each HMA on a given date.

Complete spreadsheet with number of animals in each age-sex category that were adopted (removed) from short-term holding facilities each year.

Complete spreadsheet with number of animals in each age-sex category that were removed from short-term holding facilities and placed in long-term holding facilities each year.

Complete spreadsheet with number of animals in each age-sex category that were lost (removed) from long-term holding facilities each year due to deaths or any other causes.

Complete spreadsheet with herd-specific annual counts, date of count, type of craft (helicopter, fixed-wing plane, vehicle, or horseback), population estimates, percent of HMA inventoried, and methods used for inventory for a committee-selected sample of 40 HMAs for the years 2000-2011.

Provide counts, population estimates, and removals for each HMA for the last 2 years.

Based on the census and population estimate records provided by BLM for a sample of HMAs, it is difficult to understand how these data are converted into the annual national population estimates for free-ranging horses reported by the national program office. It is important for the committee to understand the process used for converting and aggregating the HMA numbers into a national statistic. The committee requests an explanation of how this is done and some documentation of the process for the past several years.

The committee is specifically seeking documentation of the national statistics and requests that BLM provide the HMA estimates the national office received for the last 5 to 10 years that were used to generate the annual state and national estimates.

GENETIC INFORMATION

Can BLM provide any information or impressions it has regarding genetic issues or genetic defects in the herds in any of the HMAs? Obviously quantitative data (that is, number of cases) would be best, but even information on presence or absence of genetic issues would be useful as well as just any suspicions it has about genetic issues in any of the herds.

BLM has indicated that genetic defect conditions have been observed in the past (e.g., club foot, blindness) on some HMAs, but no information about which HMAs these conditions have been observed in was provided. Can BLM tell the committee which HMAs have shown evidence of any of the conditions mentioned in the previous BLM response and, if known, how many cases of the condition were observed or when they were seen?

In previous correspondence, BLM has indicated that periodically it does move horses or burros between HMAs for genetic or other reasons. Are there any protocols in place or procedures used to determine when to translocate animals and how to get them established at their new sites? For example, are translocations only done during certain times of year? Are horses held at the destination site in captivity before being released? Are translocated horses supported in any way (supplemental feed or water)? Is there any kind of post-release monitoring in place when a translocation is done?

Please provide the committee with copies of the genetics reports submitted to BLM.²

In a summary table please include:

- Population name (or other identifier)
- Estimated population size
- Number of samples analyzed
- Number and identity of the genes (loci) analyzed
- Estimated allelic diversity (average number of alleles/locus)
- Estimated heterozygosity
- F_{is} value (estimated inbreeding coefficient)
- Any suspected genetically based health issues

It would be useful to know results of the estimated degree of genetic differentiation (F_{st}) among some or all of the BLM populations if this exists.

Please provide the committee with the following information

- Report of genetic studies on burro populations
- F_{st} values based on microsatellite studies between burro herds within states and between states

²This question and the remaining under "Genetic Information" were submitted to E. Gus Cothran of Texas A&M University.

- Dates of individual surveys for horse genetics reports
- Description of information provided in the fourth column of the horse genetics reports.
- F_{st} values based on microsatellite studies between horse herds within states and between states

Is any more genetic information available about herds that may have evidence of Spanish genetics that has not been provided in reports already submitted?

THE USE AND APPLICATION OF WIN EQUUS

For a representative sample of six to eight HMAs throughout the western United States, please provide copies of the herd management assessments prepared prior to each roundup-removal action, fertility-control treatment, or both and respond to the following questions:

- For each HMA, what were the parameter values [survival and reproductive rates, carrying capacity (K), removal (by age/sex), contraceptive effectiveness] used each time WinEquus was used?
- How were the above parameters estimated? If based on data, how were those data used? If estimated, what were the rationales?
- What were the results of the above analyses?
- How precisely were the above results used in management, for example, to make decisions about how many females of what age class to remove or to treat with contraceptives?

APPROPRIATE MANAGEMENT LEVELS

How often have appropriate management levels (AMLs) been reset since 1971 for the subset of 40 HMAs selected by the committee? What are the reasons they were reset?

Please give the committee three more detailed examples of how the need to reset an AML was determined. What criteria and measurements were used? What was the relative importance of different criteria?

How does BLM decide between animal unit month allocation to wildlife species, horses, and livestock? Please provide three cases of how the decision was made and what data were used to make the decision.

Please provide the BLM report on acres that have been removed from the Wild Horse and Burro Program.

Are “land health standards” defined in: a) 43 CFR § 4180.1.; b) H-4180-1 [Rel. 4-107, dated 1/19/2001; c) 60 Federal Register (FR) at 9954; d) 43 CFR § 4180.2(b); or e) are a) and b) the same document? The most concise statement seems to be found in 43 CFR § 4180.1. Is this statement the most correct for defining Land Health Standards?

FERTILITY CONTROL

Could BLM provide a list of projects and any associated reports related to work it is conducting on SpayVac with Mark Fraker/TerraMar Environmental Research LLC?

Appendix E

Herd Management Areas

TABLE E-1 All Herd Management Areas (HMA) Sorted by Total Estimated Equid Population

Herd Management Area	Species Managed on HMA	Horse AML High ^r	Estimated Horse Population	Burro AML High ^r	Estimated Burro Population	Total Estimated		State
						Equid Population	Equid Population	
Cibola-Trigo	Both	150	367	285	805	1,172	1,172	AZ
Twin Peaks	Both	758	952	116	192	1,144	1,144	CA
Pancake	Horses	493	1,005	0	0	1,005	1,005	NV
Little Owyhee	Horses	298	936	0	0	936	936	NV
Adobe Town	Horses	800	886	0	0	886	886	WY
Black Mountain	Horses	0	0	478	800	800	800	AZ
Jackson Mountains	Horses	217	660	0	0	660	660	NV
Antelope Valley	Horses	259	608	0	0	608	608	NV
Clan Alpine	Horses	979	560	0	0	560	560	NV
Desatoya	Horses	180	543	0	0	543	543	NV
Beatys Butte	Horses	250	532	0	0	532	532	OR
Eagle	Horses	210	522	0	0	522	522	NV
Wassuk	Horses	165	519	0	0	519	519	NV
Wheeler Pass	Both	66	328	35	182	510	510	NV
Spruce-Pequetop	Horses	82	508	0	0	508	508	NV
Buffalo Hills	Horses	314	498	0	0	498	498	NV
Maverick-Medicine	Horses	276	489	0	0	489	489	NV
Cedar Mountain	Horses	390	464	0	0	464	464	UT
New Pass-Ravenswood	Horses	566	459	0	0	459	459	NV
Pilot Mountain	Horses	415	442	0	0	442	442	NV
Augusta Mountains	Horses	308	437	0	0	437	437	NV
Triple B	Horses	518	415	0	0	415	415	NV
Lake Pleasant	Burros	0	0	208	411	411	411	AZ
Musktrat Basin	Horses	250	405	0	0	405	405	WY
Divide Basin	Horses	600	400	0	0	400	400	WY
Snowstorm Mountains	Horses	140	400	0	0	400	400	NV
Seven Troughs	Both	156	298	46	88	386	386	NV
Johnnie	Burros	0	86	108	290	376	376	NV
Lava Beds	Both	148	340	16	22	362	362	NV
Salt Wells Creek	Horses	365	360	0	0	360	360	WY
Alamo	Burros	0	0	160	351	351	351	AZ
Nevada Wild Horse Range	Horses	500	312	0	38	350	350	NV
Antelope	Horses	324	349	0	0	349	349	NV

Sand Wash Basin	Horses	362	327	0	0	327	0	327	CO
Challis	Horses	253	322	0	0	322	0	322	ID
Sulphur	Horses	250	320	0	0	320	0	320	UT
Swasey	Horses	100	292	0	0	292	0	292	UT
Rock Creek	Horses	250	288	0	0	288	0	288	NV
Diamond	Horses	151	287	0	0	287	0	287	NV
Fox-Lake Range	Horses	204	285	0	0	285	0	285	NV
Calico Mountains	Horses	333	267	0	0	267	0	267	NV
Silver King	Horses	128	262	0	0	262	0	262	NV
Green Mountain	Horses	300	258	0	0	258	0	258	WY
North Stillwater	Horses	205	255	0	0	255	0	255	NV
Big Sandy	Burros	0	0	139	250	250	0	250	AZ
South Shoshone	Horses	100	250	0	0	250	0	250	NV
Callaghan	Horses	237	249	0	0	249	0	249	NV
Stone Cabin	Horses	364	246	0	0	246	0	246	NV
Diamond Hills South	Horses	22	246	0	0	246	0	246	NV
Bible Spring	Horses	60	241	0	0	241	0	241	UT
South Steens	Horses	304	229	0	0	229	0	229	OR
Roberts Mountain	Horses	150	229	0	0	229	0	229	NV
Pine Nut Mountains	Horses	179	218	0	0	218	0	218	NV
Fish Creek	Horses	180	215	0	0	215	0	215	NV
Granite Range	Horses	258	207	0	0	207	0	207	NV
Onaqui Mountain	Horses	210	206	0	0	206	0	206	UT
White Mountain	Horses	300	205	0	0	205	0	205	WY
Sand Springs West	Horses	49	200	0	0	200	0	200	NV
Coyote Lake /Alvord Tules Springs	Horses	390	198	0	0	198	0	198	OR
Confusion	Horses	115	188	0	0	188	0	188	UT
Piceance-East Douglas Creek	Horses	235	183	0	0	183	0	183	CO
Range Creek	Horses	125	179	0	0	179	0	179	UT
Gold Butte	Burros	0	0	98	176	176	0	176	NV
Diamond Hills North	Horses	37	176	0	0	176	0	176	NV
Warm Springs Canyon	Both	175	140	24	34	174	0	174	NV
Massacre Lakes	Horses	35	172	0	0	172	0	172	CA
Pryor Mountain Wild Horse Range	Horses	120	170	0	0	170	0	170	MT
Warm Springs	Both	202	133	25	35	168	0	168	OR
Frisco	Horses	60	168	0	0	168	0	168	UT
Marietta Wild Burro Range	Burros	0	20	104	144	164	0	164	NV

continued

TABLE E-1 Continued

Herd Management Area	Species Managed on HMA	Horse AML High ^a	Estimated Horse Population	Burro AML High ^a	Estimated Burro Population	Total Estimated		State
						Horse	Burro	
Sheepshead/Heath Creek	Horses	302	161	0	0	161	161	OR
Bald Mountain	Horses	215	160	0	0	160	160	NV
Owyhee	Horses	231	156	0	0	156	156	NV
Little Fish Lake	Horses	39	154	0	0	154	154	NV
Paisley Desert	Horses	150	146	0	0	146	146	OR
Kamma Mountains	Horses	77	146	0	0	146	146	NV
Little Book Cliffs Wild Horse Range	Horses	150	145	0	0	145	145	CO
Chocolate-Mule Mountains	Burros	0	0	133	144	144	144	CA
Chemehuevi	Burros	0	0	121	143	143	143	CA
McCullough Peaks	Horses	140	143	0	0	143	143	WY
Nightingale Mountains	Horses	63	126	0	17	143	143	NV
Havasu	Burros	0	0	166	142	142	142	AZ
Shawave Mountains	Horses	73	140	0	0	140	140	NV
Rocky Hills	Horses	143	139	0	0	139	139	NV
Dishpan Butte	Horses	100	139	0	0	139	139	WY
Goshute	Horses	123	136	0	0	136	136	NV
Seven Mile	Horses	50	129	0	0	129	129	NV
Fox Hog	Horses	220	126	0	0	126	126	CA
Stewart Creek	Horses	175	124	0	0	124	124	WY
Fifteenmile	Horses	160	122	0	0	122	122	WY
Conant Creek	Horses	100	123	0	0	123	123	WY
Red Rock	Both	27	58	49	65	123	123	NV
Saulsburry	Horses	40	121	0	0	121	121	NV
Hard Trigger	Horses	130	119	0	0	119	119	ID
Bullfrog	Burros	0	0	91	118	118	118	NV
Montezuma Peak	Horses	4	47	0	67	114	114	NV
Simbad	Burros	0	0	70	113	113	113	UT
Centennial	Horses	34	40	0	69	109	109	CA
Canyon Lands	Burros	0	0	100	104	104	104	UT
Reveille	Horses	138	101	0	0	101	101	NV
Montgomery Pass	Horses	80	100	0	0	100	100	NV
Bordo Atravesado	Horses	60	96	0	0	96	96	NM
Blue Wing Mountains	Both	36	63	28	32	95	95	NV

Carter Reservoir	Horses	35	95	0	0	0	95	CA
Conger	Horses	80	91	0	0	0	91	UT
Cold Spring	Horses	150	90	0	0	0	90	OR
Buckhorn	Horses	85	88	0	0	0	88	CA
Muddy Creek	Horses	125	86	0	0	0	86	UT
Flanigan	Horses	125	80	0	0	0	80	NV
Garfield Flat	Horses	125	83	0	0	0	83	NV
Rock Creek Mountain	Horses	86	83	0	0	0	83	WY
High Rock	Horses	120	78	0	0	0	78	CA
Lost Creek	Horses	82	77	0	0	0	77	WY
Antelope Hills	Horses	82	76	0	0	0	76	WY
Silver Peak	Burros	0	75	6	0	0	75	NV
Jackies Butte	Horses	150	75	0	0	0	75	OR
Three Fingers	Horses	150	75	0	0	0	75	OR
Sand Springs	Horses	200	74	0	0	0	74	OR
Black Rock Range East	Horses	93	74	0	0	0	74	NV
Black Rock Range West	Horses	93	74	0	0	0	74	NV
Crooks Mountain	Horses	85	72	0	0	0	72	WY
Little Colorado	Horses	100	70	0	0	0	70	WY
Fort Sage	Horses	29	67	0	0	0	67	CA
Coppersmith	Horses	75	64	0	0	0	64	CA
Black Mountain	Horses	60	61	0	0	0	61	ID
Cerbat Mountains	Horses	90	60	0	0	0	60	AZ
Four Mile	Horses	60	59	0	0	0	59	UT
Chloride Canyon	Horses	30	59	0	0	0	59	UT
Hickison Summit	Burros	0	0	45	57	0	57	NV
Four Mile	Horses	60	54	0	0	0	54	ID
Murderers Creek	Horses	35	53	0	0	0	53	OR
Kiger	Horses	82	51	0	0	0	51	OR
Goldfield	Burros	0	20	37	30	0	50	NV
Sand Basin	Horses	64	49	0	0	0	49	ID
Whistler Mountain	Horses	24	49	0	0	0	49	NV
Stinkingwater	Horses	80	48	0	0	0	48	OR
Palomino Buttes	Horses	64	47	0	0	0	47	OR
Tilly Creek	Horses	50	46	0	0	0	46	UT
McGee Mountain	Burros	0	0	41	45	0	45	NV
Pokegama	Horses	50	45	0	0	0	45	OR

continued

TABLE E-1 Continued

Herd Management Area	Species Managed on HMA	Horse AML High ^a	Estimated Horse Population	Burro AML High ^a	Estimated Burro Population	Total Estimated		State
						Equid Population	Equid Population	
Hog Creek	Horses	50	43	0	0	43	43	OR
Spring Creek Basin	Horses	65	42	0	0	42	42	CO
North Hills	Horses	36	40	0	0	40	40	UT
Saylor Creek	Horses	50	35	0	0	35	35	ID
Wall Canyon	Horses	25	34	0	0	34	34	CA
Waucoba-Hunter Mountain	Burros	0	0	11	33	33	33	CA
Riddle Mountain	Horses	56	33	0	0	33	33	OR
Tobin Range	Horses	42	32	0	0	32	32	NV
Nut Mountain	Horses	55	31	0	0	31	31	CA
Choke Cherry	Horses	30	30	0	0	30	30	UT
Fish Lake Valley	Horses	54	29	0	0	29	29	NV
Round Mountain	Horses	10	27	0	0	27	27	CA
Paymaster	Horses	38	26	0	0	26	26	NV
New Ravendale	Horses	25	24	0	0	24	24	CA
Red Rock Lakes	Horses	25	23	0	0	23	23	CA
Little Humboldt	Horses	80	22	0	0	22	22	NV
North Monitor	Horses	8	22	0	0	22	22	NV
Hot Creek	Horses	41	21	0	0	21	21	NV
Liggett Table	Horses	25	20	0	0	20	20	OR
Lahontan	Horses	10	20	0	0	20	20	NV
Stonewall	Burros	0	0	8	19	19	19	NV
South Stillwater	Horses	16	19	0	0	19	19	NV
Bitner	Horses	25	15	0	0	15	15	CA
Mount Elimor	Horses	25	15	0	0	15	15	UT
Dogskin Mountains	Horses	15	14	0	0	14	14	NV
Carracas Mesa	Horses	23	12	0	0	12	12	NM
Granite Peak	Horses	18	11	0	0	11	11	NV
Kingtop	Horses	40	10	0	0	10	10	UT
Gold Mountain	Burros	0	8	78	1	9	9	NV
Chicago Valley	Horses	12	6	0	0	6	6	CA
Muddy Mountains	Horses	0	6	0	0	6	6	NV
Piper Mountain	Both	17	0	82	0	0	0	CA
Horse Mountain	Horses	95	0	0	0	0	0	NV

Palmetto	Horses	76	0	0	0	0	0	NV
Lee Flat	Burros	0	0	0	0	0	0	CA
Fort Sage	Horses	36	0	15	0	0	0	NV
Amargosa Valley		0	0	0	0	0	0	NV
Ash Meadows		0	0	0	0	0	0	NV
El Dorado Mountains		0	0	0	0	0	0	NV

^aUpper bound of appropriate management level (AML).

SOURCE: Bureau of Land Management. 2012. Wild Horse and Burro Program Data. Available online at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/statistics_and_maps/Par.13260.File.dat/HAHMAstats2012Final.pdf. Accessed October 23, 2012.

TABLE E-2 All Horse-Only Herd Management Areas Sorted by Population-Size Estimate

Herd Management Area	Horse AML High ^a	Horse AML Low ^b	Estimated Horse Population	Most Recent		State	Sampled
				Inventory	Month-Year		
Saylor Creek	50	50	5	Sep-2010	Sep-2010	ID	
Chicago Valley	12	0	6	Jan-2011	Oct-2010	CA	
Nut Mountain	55	30	6	Jun-2010	Sep-2007	CA	
Cartier Reservoir	35	25	7	Jun-2010	Sep-2009	CA	
Kingtop	40	20	10	Feb-2006	Aug-2000	UT	
Carracas Mesa	23	no low	12		Dec-2005	NM	
Mount Elmor	25	15	15	Feb-2010	Jan-2011	UT	
Fish Lake Valley	54	no low	16	Feb-2010	Feb-2005	NV	
Lahontan	10	7	17	Nov-2010	Nov-2010	NV	
Hot Creek	41	no low	18	Aug-2007	Dec-2004	NV	
Red Rock Lakes	25	16	19	Oct-2010	Feb-2011	CA	
South Stillwater	16	8	19			NV	
New Ravendale	25	10	20		Sep-2009	CA	
Paymaster	38	23	20	Nov-2009	Oct-2006	NV	
Round Mountain	10	0	23	Feb-2010	Oct-2009	CA	
Liggett Table	25	10	24	Aug-2009	Sep-2009	OR	
Tobin Range	42	25	26	Sep-2010	Nov-2009	NV	
Dogskin Mountains	15	10	30	Apr-2010	Dec-2005	NV	
Choke Cherry	30	no low	30	Dec-2009	Jan-2011	UT	
North Monitor	8	no low	31	Sep-2007	Aug-2005	NV	
North Hills	36	12	33	Feb-2011	Dec-2010	UT	
Fort Sage	29	24	34	Sep-2008	Sep-1998	CA	
Hog Creek	50	30	36	Sep-2009	Nov-2009	OR	
Four Mile	60	30	36	Mar-2009	Jul-2009	UT	
Palomino Buttes	64	32	39	Sep-2005	Dec-2009	OR	
Sand Basin	64	33	40	Nov-2009	Oct-2009	ID	
Stinkingwater	80	40	40	Jul-2009	Aug-2010	OR	
Four Mile	60	37	44	Nov-2009	Oct-2009	ID	
Whistler Mountain	24	14	44	Sep-2008		NV	
Pokegama	50	30	46	Oct-2004	Jun-2000	OR	
Bitner	25	15	48	Jun-2010	Sep-2007	CA	
Black Mountain	60	30	48	Nov-2010	Nov-2010	ID	
Tilly Creek	50	20	48	Mar-2009	Jul-2010	UT	

Chloride Canyon	30	15	49	Feb-2011	Sep-2009	UT	
Blue Wing Mountains	36	22	51	Nov-2005	Nov-2005	NV	✓
Bordo Atravesado	60	40	51	Jun-2009	Jan-2011	NM	
Cerbat Mountains	90	not set	60	Aug-2006	Feb-2001	AZ	✓
Little Humboldt	80	48	66	Apr-2011	Jul-2010	NV	
Riddle Mountain	56	33	68	Apr-2010	Oct-2007	OR	
Granite Peak	18	11	70	Apr-2010	Jan-2010	NV	✓
Black Rock Range East	93	56	71	Jun-2010	Jan-2010	NV	
Bible Spring	60	30	72	Mar-2009	Dec-2010	UT	
Muddy Creek	125	30	72	Jun-2009	Jul-2009	UT	
Sand Springs	200	100	72	Jun-2010	Sep-2006	OR	✓
Buckhorn	85	59	73	Nov-2009	Dec-2009	CA	
Coppersmith	75	50	73	Nov-2009	Dec-2009	CA	
Spring Creek Basin	65	35	74	Jun-2010	Aug-2007	CO	✓
Cold Spring	150	75	75	Mar-2010	Jul-2010	OR	
Conger	80	40	76	Mar-2011	Sep-2010	UT	
Reveille	138	83	76	Feb-2010	Sep-2010	NV	✓
Rock Creek Mountain	86	50	77	Jul-2010	Jul-2009	WY	
Montgomery Pass	0	not set	79	Aug-2009	Sep-1998	NV	✓
Little Fish Lake	39	no low	85	Jun-2010	Feb-2006	NV	
Wall Canyon	25	15	88	Nov-2010	Sep-2007	CA	
Hard Trigger	130	66	93	Apr-2010	Nov-2010	ID	✓
Kiger	82	51	100	Nov-2005	Oct-2007	OR	
Nightingale Mountains	63	38	101	Nov-2009	Dec-2005	NV	
Fifteenmile	160	70	107	Oct-2009	Nov-2009	WY	
Garfield Flat	125	75	112	Nov-2005	Oct-2009	NV	✓
Shawave Mountains	73	44	112	Oct-2010	Nov-2005	NV	
Goshute	123	74	113	Nov-2010	Feb-2011	NV	✓
Rocky Hills	143	90	113	Aug-2010	Dec-2010	NV	
Crooks Mountain	85	65	115	Nov-2009	Aug-2006	WY	✓
Paisley Desert	150	60	117	Nov-2005	Dec-2009	OR	✓
Kamma Mountains	77	46	119	Jul-2010	Dec-2005	NV	✓
Conant Creek	100	60	120	Feb-2011	Jul-2009	WY	
McCullough Peaks	140	70	124	Jun-2010	Oct-2009	WY	✓
Little Book Cliffs Wild Horse Range	150	90	135	Nov-2010	Sep-2007	CO	✓
Bald Mountain	215	129	136	Jan-2010	Dec-2010	NV	
Frisco	60	12	140	Aug-2006	Aug-2006	UT	

continued

TABLE E-2 Continued

Herd Management Area	Horse AML High ^a	Horse AML Low ^b	Estimated Horse Population	Most Recent Inventory Month-Year	Last Gather Month-Year	State	Sampled
Black Rock Range West	93	56	143	Jun-2010	Feb-2010	NV	✓
Diamond Hills North	37	22	145	Mar-2010	Jul-2004	NV	
Jacks Butte	150	75	147	Mar-2010	Oct-2007	OR	✓
Massacre Lakes	35	25	149	Jun-2010	Oct-1988	CA	✓
Range Creek	125	75	149	Feb-2010	Jul-2006	UT	
Dishpan Butte	100	50	155	Jul-2010	Jul-2009	WY	
Lost Creek	82	60	155	Aug-2010	Nov-2009	WY	✓
Confusion	115	70	157	Mar-2010	Sep-2010	UT	
Onaqui Mountain	210	121	159	Feb-2010	Oct-2009	UT	
Pryor Mountain Wild Horse Range	120	100	159			MT	✓
Granite Range	258	155	160			NV	
Antelope Hills	82	60	162	Jun-2010	Feb-2005	NV	
Seven Mile	50	no low	162	Aug-2010	Nov-2009	WY	
Fish Creek	180	108	163	Sep-2007	Aug-2005	NV	✓
Saulsbury	40	24	172	Sep-2007	Feb-2006	NV	
Owyhee	231	139	180	Aug-2009	Feb-2007	NV	
Pine Nut Mountains	179	118	182	Apr-2011	Jul-2010	NV	✓
Rock Creek	250	83	185	Nov-2010	Dec-2010	NV	
South Steens	304	159	191	Apr-2011	Jul-2010	NV	
Murderers Creek	35	13	198	Jul-2009	Nov-2009	OR	✓
Eagle	210	126	200	Jan-2011	Feb-2011	OR	
Silver King	128	76	200	Oct-2010	Jan-2011	NV	
Diamond Hills South	22	no low	202	Sep-2010	Oct-2010	NV	✓
Coyote Lake / Alvord Tule Springs	390	198	212	Mar-2010	Jul-2004	NV	
North Stillwater	205	123	214	Jun-2010	Nov-2008	OR	
Nevada Wild Horse Range	500	300	216	Jul-2008	Jul-2008	NV	✓
Callaghan	237	147	221	Sep-2009	Jul-2008	NV	
South Shoshone	100	60	224	Nov-2010	Jan-2011	NV	
Antelope	324	194	239	Oct-2009	Jan-2009	NV	✓
Swasey	100	60	243	Oct-2010	Feb-2011	NV	
Diamond	151	91	244	Mar-2011	Jul-2007	UT	
Fox-Lake Range	204	122	244	Mar-2010	Jul-2004	NV	✓
Roberts Mountain	150	90	248	Jul-2008	Jul-2008	NV	
				Sep-2008	Jan-2008	NV	

Augusta Mountains	308	185	256	Jan-2011	Feb-2011	NV	✓
Little Colorado	100	69	256	Apr-2010	Dec-2007	WY	
Three Fingers	150	75	261	Mar-2010	Aug-2006	OR	✓
Sulphur	250	165	267	Nov-2010	Dec-2010	UT	
Sand Wash Basin	362	163	270	Jun-2010	Oct-2008	CO	✓
Challis	253	185	270	Jul-2010	Dec-2009	ID	✓
Stewart Creek	175	125	275	Aug-2010	Nov-2009	WY	✓
Lava Beds	148	89	277	Nov-2005	Dec-2005	NV	
Flanigan	125	80	278	Apr-2010	Oct-2006	NV	
Sand Springs West	49	29	285	Apr-2008	Jan-2006	NV	✓
Sheepshead/Heath Creek	302	161	293	Jun-2010	Nov-2008	OR	
Salt Wells Creek	365	251	300	Sep-2010	Nov-2010	WY	
Piceance-East Douglas Creek	235	135	320	Mar-2010	Oct-2010	CO	✓
Snowstorm Mountains	140	90	320	Apr-2011	Oct-2006	NV	
Muskkrat Basin	250	160	359	Jul-2010	Jul-2009	WY	✓
Cedar Mountain	390	190	362	Feb-2009	Dec-2008	UT	
Wassuk	165	109	362	Apr-2010		NV	
Centennial	168	134	366	May-2010	Oct-2010	CA	✓
New Pass-Ravenswood	566	no low	396	Nov-2010	Jan-2011	NV	
Pilot Mountain	415	249	402	Jan-2011	Jan-2005	NV	✓
Buffalo Hills	314	188	415	Jan-2009	Jan-2009	NV	
Beatys Butte	250	100	416	Nov-2009	Sep-2009	OR	✓
Spruce-Pequop	82	49	423	Oct-2010	Feb-2011	NV	
Calico Mountains	333	200	450	Jun-2010	Feb-2010	NV	
High Rock	120	78	458	Jun-2010	Sep-2006	CA	✓
Stone Cabin	364	218	476	Aug-2009	Feb-2007	NV	
Fox Hog	220	120	479	Jun-2010	Aug-2005	CA	✓
Green Mountain	300	170	490	Aug-2010	Oct-2009	WY	
Clan Alpine	979	619	503	Dec-2010	Oct-2006	NV	✓
Antelope Valley	259	155	519	Oct-2010	Feb-2011	NV	
Desatoya	180	127	520	Apr-2010	Feb-2004	NV	✓
Jackson Mountains	217	130	520	Sep-2007	Sep-2007	NV	
White Mountain	300	205	545	Apr-2010	Nov-2007	WY	
Maverick-Medicine	276	166	553	Nov-2010	Aug-2006	NV	✓
Adobe Town	800	610	738	Sep-2010	Nov-2010	WY	
Little Owyhee	298	194	780	Apr-2011	Nov-2004	NV	

continued

TABLE E-2 Continued

Herd Management Area	Horse AML High ^a	Horse AML Low ^b	Estimated Horse Population	Most Recent Inventory Month-Year	Last Gather Month-Year	State	Sampled
Triple B	518	312	1,217	Nov-2010		NV	✓
Pancake	493	296	1,291	Jan-2006		NV	
Divide Basin	600	415	1,355	Nov-2009	Sep-2007	WY	

^aUpper bound of appropriate management level (AML).

^bLower bound of appropriate management level.

NOTE: The following Herd Management Areas (HMAs) were removed from Table E-1: All HMAs with zero animals, AMLs of zero, or both; all HMAs with mixed burros and horses; and all burro-only HMAs. All remaining HMAs were numerically ordered by most recent population-size estimate. All HMAs with fewer than 50 horses were excluded. Every third HMA was systematically selected, resulting in 36 HMAs. Four additional HMAs that were used in Eberhardt et al. (1982) and Garrott et al. (1991a) were added to total 40 HMAs sampled.

SOURCE: Spreadsheet and survey request based on information provided to the committee by the Bureau of Land Management in December 2011. To access the spreadsheet, contact the National Research Council's Public Access Records Office at paro@nas.edu. Referenced articles are included in Chapter 2.

TABLE E-3 Surveyed Horse Herd Management Areas Sorted by Population-Size Estimate

Herd Management Area	Horse AML High ^a	Horse AML Low ^b	Estimated Horse Population	Most Recent Inventory Month-Year	Last Gather Month-Year	State
Blue Wing Mountains	36	22	51	Nov-2005	Nov-2005	NV
Little Humboldt	80	48	66	Apr-2011	Jul-2010	NV
Black Rock Range East	93	56	71	Jun-2010	Jan-2010	NV
Sand Springs	200	100	72	Jun-2010	Sep-2006	OR
Spring Creek Basin	65	35	74	Jun-2010	Aug-2007	CO
Reveille	138	83	76	Feb-2010	Sep-2010	NV
Little Fish Lake	39	no low	85	Aug-2009	Feb-2006	NV
Kiger	82	51	100	Apr-2010	Oct-2007	OR
Garfield Flat	125	75	112	Oct-2009	Oct-2009	NV
Rocky Hills	143	90	113	Nov-2010	Dec-2010	NV
Paisley Desert	150	60	117	Nov-2009	Dec-2009	OR
Kamma Mountains	77	46	119	Nov-2005	Dec-2005	NV
McCullough Peaks	140	70	124	Feb-2011	Oct-2009	WY
Little Book Cliffs Wild Horse Range	150	90	135	Jun-2010	Sep-2007	CO
Black Rock Range West	93	56	143	Jun-2010	Feb-2010	NV
Jacks Butte	150	75	147	Mar-2010	Oct-2007	OR
Massacre Lakes	35	25	149	Jun-2010	Oct-1988	CA
Lost Creek	82	60	155	Aug-2010	Nov-2009	WY
Pryor Mountain Wilde Horse Range	120	100	159			MT
Seven Mile	50	no low	162	Sep-2007	Aug-2005	NV
Owyhee	231	139	180	Apr-2011	Jul-2010	NV
South Steens	304	159	191	Jul-2009	Nov-2009	OR
Silver King	128	76	200	Sep-2010	Oct-2010	NV
North Stillwater	205	123	214	Jul-2008	Jul-2008	NV
South Shoshone	100	60	224	Oct-2009	Jan-2009	NV
Diamond	151	91	244	Mar-2010	Jul-2004	NV
Augusta Mountains	308	185	256	Jan-2011	Feb-2011	NV
Sulphur	250	165	267	Nov-2010	Dec-2010	UT
Challis	253	185	270	Jul-2010	Dec-2009	ID
Stewart Creek	175	125	275	Aug-2010	Nov-2009	WY
Sand Springs West	49	29	285	Apr-2008	Jan-2006	NV
Piceance-East Douglas Creek	235	135	320	Mar-2010	Oct-2010	CO

continued

TABLE E-3 Continued

Herd Management Area	Horse AML High ^a	Horse AML Low ^b	Estimated Horse Population	Most Recent Inventory Month-Year	Last Gather Month-Year	State
Cedar Mountain	390	190	362	Feb-2009	Dec-2008	UT
New Pass-Ravenswood	566	no low	396	Nov-2010	Jan-2011	NV
Beatys Butte	250	100	416	Nov-2009	Sep-2009	OR
High Rock	120	78	458	Jun-2010	Sep-2006	CA
Green Mountain	300	170	490	Aug-2010	Oct-2009	WY
Desatoya	180	127	520	Apr-2010	Feb-2004	NV
Maverick-Medicine	276	166	553	Nov-2010	Aug-2006	NV
Triple B	518	312	1,217	Nov-2010		NV

^aUpper bound of appropriate management level (AML).

^bLower bound of AML.

SOURCE: Spreadsheet and survey request based on information provided to the committee by the Bureau of Land Management in December 2011. To access the spreadsheet, contact the National Research Council's Public Access Records Office at paro@nas.edu.

Appendix F

Pairwise Values of Genetic Distance (F_{st})

TABLE F-1 Pairwise Values of Genetic Distance (F_{st}) Between Bureau of Land Management Burro Herds Based on 12 Polymorphic Microsatellite DNA Loci

		ki	rc	pa	bv	sv	lf	cm	co	sr	ce
Kingman, AZ	ki	0.000									
Picacho, CA	rc	0.094	0.000								
Pannaments, CA	pa	0.070	0.105	0.000							
Butte Valley, CA	bv	0.063	0.102	0.040	0.000						
Saline Valley, CA	sv	0.070	0.118	0.052	0.048	0.000					
Lee Flats, CA	lf	0.155	0.072	0.180	0.155	0.191	0.000				
Clark Mtn., CA	cm	0.101	0.078	0.064	0.064	0.079	0.150	0.000			
Chocolate Mule, CA	co	0.096	0.010	0.095	0.093	0.118	0.064	0.087	0.000		
Slate Range, CA	sr	0.055	0.078	0.036	0.035	0.033	0.143	0.049	0.087	0.000	
Centennial, CA	ce	0.075	0.113	0.067	0.064	0.044	0.185	0.081	0.116	0.018	0.000
Sinbad, UT	si	0.093	0.078	0.110	0.097	0.115	0.158	0.108	0.069	0.087	0.136
Yuma 1, AZ	yu	0.066	0.061	0.089	0.066	0.091	0.119	0.082	0.050	0.058	0.100
Chemehuevi, CA	ci	0.147	0.116	0.119	0.129	0.138	0.126	0.125	0.114	0.108	0.147
Park Moab, CA	pm	0.241	0.246	0.223	0.220	0.229	0.259	0.222	0.239	0.210	0.240
Blue Wing, NV	bw	0.251	0.227	0.257	0.241	0.247	0.354	0.219	0.251	0.222	0.246
Seven Tanks, NV	st	0.168	0.147	0.194	0.163	0.159	0.219	0.123	0.157	0.137	0.159
Ed's Camp, AZ	ec	0.152	0.165	0.173	0.145	0.144	0.227	0.151	0.175	0.126	0.143
Cibola-Trigo 2, AZ	ct	0.065	0.076	0.091	0.070	0.088	0.124	0.084	0.068	0.060	0.094
Big Sandy, NV	bs	0.062	0.067	0.054	0.054	0.060	0.123	0.061	0.067	0.047	0.080
Havasu, AZ	hv	0.170	0.168	0.174	0.166	0.181	0.218	0.173	0.173	0.150	0.181
Cibola-Trigo 2, AZ	k2	0.185	0.200	0.180	0.174	0.189	0.257	0.180	0.203	0.159	0.193
East Mohave, CA	em	0.173	0.208	0.175	0.167	0.162	0.262	0.204	0.213	0.160	0.179
Montezuma, CA	mz	0.405	0.398	0.416	0.389	0.451	0.539	0.397	0.374	0.373	0.424
Twin Peaks, CA	tp	0.210	0.210	0.235	0.211	0.199	0.250	0.223	0.214	0.188	0.204
Bullfrog, NV	bf	0.220	0.281	0.255	0.229	0.241	0.321	0.269	0.272	0.219	0.238

SOURCE: Data provided by E. Gus Cothran. To access the data, contact the National Research Council's Public Access Records Office at paro@nas.edu.

si	yu	ci	pm	bw	st	ec	ct	bs	hv	k2	em	mz	tp	bf
0.000														
0.047	0.000													
0.148	0.113	0.000												
0.291	0.236	0.091	0.000											
0.234	0.209	0.240	0.294	0.000										
0.176	0.124	0.220	0.293	0.161	0.000									
0.167	0.126	0.166	0.202	0.103	0.100	0.000								
0.054	0.030	0.117	0.231	0.188	0.120	0.098	0.000							
0.061	0.057	0.113	0.217	0.185	0.148	0.132	0.036	0.000						
0.185	0.158	0.114	0.104	0.140	0.226	0.113	0.151	0.143	0.000					
0.199	0.166	0.125	0.107	0.139	0.210	0.085	0.153	0.159	0.021	0.000				
0.197	0.180	0.163	0.141	0.150	0.242	0.098	0.142	0.146	0.055	0.055	0.000			
0.409	0.329	0.262	0.355	0.470	0.436	0.319	0.336	0.384	0.259	0.223	0.302	0.000		
0.191	0.173	0.154	0.142	0.171	0.204	0.111	0.164	0.188	0.086	0.082	0.094	0.261	0.000	
0.242	0.188	0.198	0.184	0.224	0.256	0.123	0.177	0.228	0.122	0.091	0.101	0.204	0.076	0.000

TABLE F-2 Pairwise Values of Genetic Distance (F_{st}) Values Between Bureau of Land Management Horse Herds Based on 12 Polymorphic Microsatellite DNA Loci

	Cibola-Trigo, AZ	Painted Rock, AZ	Bitner, CA (2011)	Buckhorn, CA	Buckhorn, CA (2010)	Carter Reservoir, CA	Centennial, CA
Cibola-Trigo, AZ	0.000						
Painted Rock, AZ	0.249	0.000					
Bitner, CA (2011)	0.149	0.147	0.000				
Buckhorn, CA	0.144	0.129	0.035	0.000			
Buckhorn, CA (2010)	0.141	0.134	0.035	0.009	0.000		
Carter Reservoir, CA	0.142	0.099	0.064	0.053	0.060	0.000	
Centennial, CA	0.134	0.158	0.058	0.048	0.039	0.071	0.000
Coppersmith, CA	0.159	0.170	0.061	0.057	0.054	0.093	0.053
Fox Hog, CA (2011)	0.123	0.144	0.041	0.028	0.023	0.063	0.040
High Rock, CA	0.103	0.120	0.037	0.027	0.023	0.046	0.033
Niut Mountain, CA (2011)	0.122	0.123	0.033	0.035	0.032	0.044	0.044
Santa Cruz Island, CA	0.161	0.212	0.153	0.108	0.104	0.149	0.143
Twin Peaks, CA	0.121	0.122	0.037	0.015	0.014	0.048	0.033
Twin Peaks, CA (All, 2011)	0.120	0.135	0.029	0.022	0.023	0.046	0.029
Twin Peaks, CA (Gilman SP)	0.129	0.141	0.039	0.031	0.032	0.053	0.029
Twin Peaks, CA (S Observa)	0.131	0.136	0.032	0.022	0.022	0.048	0.035
Twin Peaks, CA (Skeddle)	0.116	0.149	0.037	0.036	0.037	0.056	0.035
Wall Canyon, CA (2011)	0.111	0.137	0.053	0.048	0.044	0.057	0.052
Barcus Creek, CO	0.161	0.152	0.065	0.059	0.057	0.075	0.069
East Douglas, CO	0.178	0.137	0.084	0.076	0.078	0.081	0.090
Little Book Cliffs, CO	0.149	0.130	0.048	0.040	0.038	0.055	0.046
Mesa, CO	0.135	0.147	0.047	0.041	0.037	0.063	0.033
Sand Wash, CO	0.162	0.138	0.044	0.041	0.038	0.048	0.050
Spring Creek, CO	0.161	0.141	0.083	0.065	0.060	0.082	0.072
Spring Creek Basin, CO	0.161	0.150	0.074	0.063	0.059	0.079	0.069
West Douglas, CO	0.140	0.166	0.083	0.062	0.061	0.091	0.077
West Douglas, CO (2006)	0.134	0.173	0.096	0.069	0.067	0.099	0.077
Black Mountain, ID	0.163	0.145	0.060	0.068	0.069	0.084	0.074
Black Mountain, ID (2010)	0.156	0.133	0.052	0.055	0.053	0.070	0.060
Challis, ID	0.142	0.139	0.050	0.037	0.039	0.061	0.056
Hard Trigger, ID	0.141	0.138	0.046	0.046	0.040	0.060	0.055
Hard Trigger, ID (2010)	0.156	0.142	0.046	0.049	0.044	0.061	0.060
Idaho, ID (BLM)	0.153	0.169	0.051	0.052	0.046	0.083	0.053

Sand Basin, ID	0.127	0.158	0.046	0.043	0.039	0.065	0.050
Saylor Creek, ID	0.154	0.136	0.037	0.037	0.037	0.063	0.058
Pryor Mountains, MT (2001)	0.146	0.175	0.077	0.072	0.069	0.088	0.078
Pryor Mountains, MT (2009)	0.121	0.140	0.049	0.040	0.038	0.058	0.055
Bordo Atravizado, NM	0.152	0.158	0.052	0.041	0.040	0.065	0.043
El Rito, NM	0.147	0.137	0.049	0.033	0.028	0.060	0.038
Jacarilla, NM	0.137	0.135	0.050	0.034	0.034	0.064	0.052
Jarita, NM	0.169	0.129	0.079	0.056	0.047	0.089	0.064
Jicarilla, NM	0.210	0.138	0.090	0.063	0.050	0.111	0.073
Antelope Valley, NV	0.138	0.135	0.046	0.030	0.032	0.053	0.045
Antelope Valley, NV (2011)	0.145	0.129	0.048	0.034	0.037	0.053	0.042
Augusta Mountains, NV	0.128	0.125	0.051	0.036	0.038	0.057	0.042
Bald Mountain, NV	0.116	0.121	0.039	0.023	0.023	0.044	0.040
Black Rock East, NV (2005)	0.145	0.148	0.050	0.051	0.048	0.066	0.066
Black Rock East, NV (2010)	0.131	0.138	0.049	0.046	0.042	0.065	0.058
Black Rock East, NV (2011)	0.140	0.123	0.053	0.041	0.039	0.060	0.047
Black Rock West, NV (2005)	0.110	0.153	0.046	0.050	0.045	0.067	0.058
Black Rock West, NV (2010)	0.113	0.159	0.047	0.050	0.043	0.073	0.053
Black Rock West, NV (2011)	0.129	0.177	0.064	0.072	0.061	0.094	0.052
Buffalo Hills, NV	0.174	0.151	0.051	0.039	0.037	0.071	0.065
Buffalo Hills, NV (2009)	0.152	0.137	0.045	0.027	0.026	0.057	0.053
Calico, NV	0.120	0.136	0.035	0.024	0.020	0.052	0.035
Calico Mountains, NV	0.148	0.140	0.042	0.033	0.033	0.068	0.057
Calico Mountains, NV (2011)	0.134	0.141	0.034	0.029	0.025	0.058	0.037
Callaghan, NV (Austin Allot)	0.134	0.110	0.047	0.024	0.024	0.047	0.040
Callaghan, NV (East Allot)	0.118	0.118	0.041	0.025	0.028	0.036	0.037
Catnip Herd, NV	0.143	0.155	0.051	0.044	0.039	0.078	0.059
Chimney Creek, NV	0.129	0.150	0.050	0.046	0.042	0.064	0.057
Desatoya Mountain, NV	0.154	0.155	0.090	0.060	0.066	0.095	0.088
Dolly Varden, NV	0.128	0.144	0.052	0.037	0.029	0.067	0.035
Dry Lake, NV	0.161	0.147	0.062	0.034	0.039	0.080	0.057
Fish Creek, NV	0.135	0.124	0.055	0.039	0.039	0.061	0.044
Goshute, NV	0.167	0.172	0.067	0.047	0.046	0.078	0.046
Goshute, NV (2011)	0.150	0.155	0.062	0.049	0.049	0.069	0.047
Granite, NV	0.127	0.140	0.041	0.027	0.027	0.050	0.038
Granite Range, NV	0.125	0.145	0.044	0.030	0.025	0.052	0.042

TABLE F-2 Continued

	Cibola-Trigo, AZ	Painted Rock, AZ	Bitner, CA (2011)	Buckhorn, CA (2010)	Buckhorn, CA (2010)	Carter Reservoir, CA	Centennial, CA
Granite Range, NV (2011)	0.126	0.137	0.043	0.025	0.021	0.052	0.031
Grass Valley, NV	0.123	0.119	0.052	0.029	0.030	0.050	0.044
Hall Creek, NV	0.149	0.112	0.051	0.024	0.025	0.055	0.042
Jakes Wash, NV	0.161	0.151	0.078	0.060	0.066	0.081	0.083
Johannie, NV	0.154	0.118	0.077	0.054	0.058	0.072	0.071
Lahanton Reservoir, NV	0.159	0.169	0.068	0.062	0.056	0.086	0.058
Little Fish Lake, NV	0.159	0.134	0.066	0.051	0.054	0.061	0.044
Little Highrock Canyon, NV	0.148	0.163	0.044	0.039	0.027	0.083	0.042
Little Humboldt, NV	0.168	0.128	0.057	0.045	0.050	0.061	0.068
Little Humboldt, NV (2010)	0.145	0.120	0.043	0.032	0.036	0.052	0.048
Little Owyhee, NV (Fairbanks)	0.156	0.123	0.072	0.043	0.045	0.065	0.054
Little Owyhee, NV (Lake Creek)	0.155	0.129	0.055	0.040	0.035	0.062	0.056
Little Owyhee, NV (Twin Valley)	0.105	0.140	0.057	0.038	0.035	0.065	0.048
Marvel Gap, NV (SWC 2010)	0.140	0.137	0.035	0.033	0.030	0.060	0.049
McGee Mountain, NV	0.121	0.133	0.041	0.032	0.038	0.054	0.050
Miller Mountain, NV (SWC 2010)	0.139	0.123	0.044	0.030	0.030	0.044	0.043
Montezuma Peak, NV	0.165	0.176	0.056	0.053	0.046	0.094	0.041
Nellis, NV	0.122	0.120	0.043	0.030	0.036	0.042	0.041
New Pass-Ravenswood, NV	0.109	0.114	0.043	0.024	0.025	0.050	0.043
North Stillwater, NV	0.140	0.140	0.045	0.036	0.037	0.060	0.050
Paymaster, NV (2006)	0.177	0.169	0.056	0.052	0.047	0.087	0.053
Paymaster, NV (2010)	0.179	0.175	0.056	0.054	0.048	0.093	0.051
Pine Nut Mountain, NV	0.159	0.122	0.084	0.055	0.061	0.095	0.072
Powell Mountain, NV	0.203	0.158	0.088	0.067	0.070	0.084	0.067
Red Rock, NV	0.132	0.148	0.058	0.050	0.050	0.071	0.040
Reveille, NV	0.129	0.153	0.053	0.043	0.054	0.057	0.057
Roberts Mountain, NV	0.132	0.131	0.049	0.043	0.043	0.047	0.045
Rock Creek, NV (2002)	0.172	0.143	0.076	0.058	0.064	0.091	0.081
Rock Creek, NV (2010)	0.148	0.121	0.060	0.046	0.051	0.069	0.062
Rocky Hills, NV	0.136	0.149	0.053	0.038	0.036	0.070	0.046
Rodeo Creek, NV	0.131	0.121	0.039	0.025	0.026	0.047	0.034
Saulsberry, NV	0.116	0.117	0.048	0.034	0.036	0.053	0.047
Sand Springs East, NV	0.126	0.131	0.038	0.030	0.038	0.050	0.049
Seven Mile, NV	0.153	0.143	0.054	0.050	0.049	0.068	0.056

continued

Shawave Mountains, NV	0.160	0.127	0.040	0.023	0.019	0.020	0.061	0.043
Silver Peak, NV	0.126	0.130	0.058	0.036	0.035	0.051	0.061	0.061
Snowstorm, NV (Castle Ridge)	0.169	0.144	0.050	0.037	0.040	0.064	0.064	0.056
Snowstorm, NV (Dryhill)	0.151	0.168	0.070	0.070	0.064	0.096	0.096	0.067
South Shoshone, NV	0.121	0.123	0.044	0.035	0.037	0.048	0.048	0.039
Spruce-Pequop, NV (2011)	0.145	0.153	0.070	0.050	0.048	0.083	0.083	0.050
Stillwater, NV	0.147	0.151	0.044	0.043	0.041	0.071	0.071	0.052
Stone Cabin, NV	0.121	0.117	0.043	0.030	0.034	0.040	0.040	0.046
Warm Springs, NV	0.116	0.137	0.039	0.039	0.037	0.051	0.051	0.049
Warm Springs Canyon, NV	0.102	0.130	0.033	0.030	0.028	0.053	0.053	0.044
Wheeler Pass, NV	0.156	0.141	0.091	0.070	0.074	0.084	0.084	0.078
Wheeler Pass, NV (2007)	0.141	0.120	0.050	0.036	0.036	0.056	0.056	0.042
Alvord Tule, OR	0.119	0.136	0.059	0.040	0.040	0.056	0.056	0.061
Beatys Butte, OR	0.126	0.129	0.039	0.026	0.023	0.046	0.046	0.035
Beatys Butte, OR (2010)	0.145	0.133	0.036	0.026	0.020	0.051	0.051	0.031
Big Summit, OR (2010)	0.220	0.215	0.129	0.092	0.102	0.121	0.121	0.128
Cold Spring, OR	0.119	0.128	0.055	0.038	0.035	0.061	0.061	0.044
Cold Spring, OR (2010)	0.140	0.140	0.061	0.041	0.039	0.069	0.069	0.048
Coyote Lake, OR	0.125	0.132	0.067	0.043	0.047	0.052	0.052	0.062
Coyote Lake, OR (2011)	0.126	0.128	0.051	0.032	0.036	0.049	0.049	0.052
Fishnet, OR	0.140	0.147	0.045	0.041	0.041	0.065	0.065	0.050
Hog Creek, OR	0.124	0.127	0.060	0.031	0.036	0.059	0.059	0.040
Jackies Butte, OR	0.140	0.143	0.062	0.055	0.055	0.074	0.074	0.050
Jackies Butte, OR (2011)	0.118	0.140	0.045	0.042	0.041	0.068	0.068	0.041
Kiger, OR (2011)	0.163	0.133	0.055	0.039	0.038	0.062	0.062	0.060
Kiger Herd, OR (2009)	0.153	0.120	0.058	0.045	0.047	0.052	0.052	0.070
Liggett Table, OR	0.196	0.298	0.173	0.164	0.149	0.205	0.205	0.157
Murderers Creek, OR (2001)	0.197	0.128	0.088	0.079	0.076	0.091	0.091	0.094
Murderers Creek, OR (2009)	0.183	0.122	0.080	0.067	0.063	0.077	0.077	0.082
Paisley Desert, OR	0.119	0.119	0.036	0.026	0.029	0.041	0.041	0.038
Riddle Herd, OR (2009)	0.150	0.149	0.061	0.051	0.046	0.074	0.074	0.073
Riddle Mountain, OR	0.155	0.149	0.063	0.050	0.043	0.079	0.079	0.073
Riddle Mountain, OR (2011)	0.149	0.148	0.067	0.058	0.053	0.076	0.076	0.080
Sand Springs, OR (2011)	0.145	0.133	0.050	0.025	0.029	0.056	0.056	0.055
Sheepshead, OR	0.144	0.104	0.054	0.036	0.036	0.044	0.044	0.051
Sheepshead, OR (2011)	0.142	0.115	0.049	0.032	0.032	0.051	0.051	0.048
South Steens, OR	0.118	0.118	0.046	0.031	0.029	0.051	0.051	0.045

TABLE F-2 Continued

	Cibola-Trigo, AZ	Painted Rock, AZ	Bitner, CA (2011)	Buckhorn, CA	Buckhorn, CA (2010)	Carter Reservoir, CA	Centennial, CA
South Steens, OR (2010)	0.125	0.122	0.045	0.032	0.029	0.054	0.034
Stinkingwater, OR	0.151	0.152	0.075	0.065	0.065	0.082	0.066
Three Fingers, OR	0.159	0.143	0.047	0.050	0.045	0.069	0.063
Three Fingers, OR (2011)	0.140	0.132	0.048	0.047	0.046	0.065	0.058
Warm Springs, OR	0.117	0.121	0.038	0.033	0.034	0.057	0.046
Warm Springs, OR (2010)	0.111	0.121	0.040	0.033	0.031	0.056	0.044
Blawn Wash, UT	0.135	0.191	0.085	0.075	0.076	0.096	0.064
Cedar Mountain, UT	0.096	0.129	0.065	0.046	0.046	0.061	0.053
Cedar Ridge, UT	0.176	0.161	0.086	0.069	0.068	0.096	0.093
Cedar Ridge, UT (trap)	0.182	0.170	0.091	0.069	0.069	0.102	0.092
Cold Springs, UT (2006)	0.147	0.212	0.081	0.091	0.090	0.136	0.112
Cold Springs, UT (trap)	0.132	0.176	0.071	0.065	0.072	0.099	0.086
Delta, UT	0.136	0.107	0.048	0.027	0.031	0.042	0.042
Hill Creek, UT	0.141	0.128	0.048	0.033	0.034	0.056	0.052
Muddy Creek, UT	0.179	0.196	0.108	0.078	0.089	0.109	0.087
North Hills, UT	0.162	0.145	0.092	0.072	0.070	0.089	0.081
Range Creek, UT	0.127	0.149	0.051	0.046	0.045	0.080	0.069
Sinbad, UT	0.201	0.149	0.090	0.056	0.064	0.091	0.086
Sulphur, UT	0.212	0.185	0.118	0.100	0.101	0.104	0.097
Sulphur Herd, UT (South, 2006)	0.163	0.122	0.071	0.051	0.049	0.073	0.083
Tilley Creek, UT	0.199	0.211	0.076	0.070	0.066	0.103	0.070
Winter Ridge, UT	0.159	0.117	0.051	0.036	0.034	0.054	0.040
Adobe Town, WY	0.154	0.129	0.043	0.028	0.030	0.053	0.040
Adobe Town, WY (2011)	0.138	0.137	0.029	0.026	0.021	0.055	0.033
Antelope Hills, WY	0.144	0.135	0.057	0.038	0.037	0.062	0.062
Conant Creek, WY (Lander)	0.180	0.162	0.076	0.062	0.064	0.070	0.065
Cooper Creek, WY	0.134	0.120	0.053	0.034	0.038	0.049	0.046
Dishpan Butte, WY (Lander)	0.168	0.150	0.064	0.042	0.047	0.067	0.057
Divide Basin, WY	0.127	0.110	0.042	0.021	0.022	0.044	0.041
Divide Basin, WY (2011)	0.137	0.113	0.043	0.022	0.025	0.046	0.040
Eagles Nest, WY	0.159	0.143	0.078	0.050	0.054	0.062	0.072
Happy Creek Springs, WY	0.169	0.152	0.068	0.046	0.052	0.071	0.077
Little Colorado, WY	0.130	0.139	0.050	0.042	0.037	0.066	0.050
Little Colorado, WY (2011)	0.130	0.134	0.047	0.039	0.033	0.064	0.043

Lost Creek, WY	0.126	0.107	0.054	0.027	0.028	0.045	0.045
Lost Creek, WY (combined)	0.127	0.115	0.054	0.027	0.030	0.048	0.046
McCullough Peaks, WY	0.151	0.128	0.058	0.040	0.041	0.060	0.064
Muskkrat Basin, WY (Lander)	0.161	0.146	0.069	0.046	0.052	0.059	0.062
Salt Wells, WY (East)	0.116	0.134	0.040	0.030	0.027	0.051	0.029
Salt Wells, WY (West)	0.139	0.117	0.044	0.028	0.029	0.046	0.045
Stewart Creek, WY	0.132	0.115	0.064	0.038	0.039	0.051	0.063
Stewart Creek, WY (2009)	0.150	0.125	0.058	0.038	0.041	0.047	0.059
White Mountain, WY (2011)	0.160	0.147	0.049	0.039	0.033	0.060	0.028
	Coppersmith, CA	Fox Hog, CA (2011)	High Rock, CA	Nut Mountain, CA (2011)	Santa Cruz Island, CA	Twin Peaks, CA	Twin Peaks, CA (All, 2011)
Coppersmith, CA	0.000						
Fox Hog, CA (2011)	0.059	0.000					
High Rock, CA	0.052	0.021	0.000				
Nut Mountain, CA (2011)	0.060	0.031	0.013	0.000			
Santa Cruz Island, CA	0.143	0.119	0.102	0.114	0.000		
Twin Peaks, CA	0.041	0.021	0.018	0.024	0.095	0.000	
Twin Peaks, CA (All, 2011)	0.042	0.027	0.019	0.025	0.109	0.009	0.000
Twin Peaks, CA (Gilman SP)	0.048	0.030	0.024	0.032	0.128	0.021	0.012
Twin Peaks, CA (S Observa)	0.047	0.031	0.024	0.029	0.110	0.010	0.003
Twin Peaks, CA (Skeddle)	0.048	0.034	0.025	0.031	0.116	0.020	0.006
Wall Canyon, CA (2011)	0.070	0.048	0.018	0.022	0.106	0.036	0.037
Barcus Creek, CO	0.078	0.057	0.054	0.066	0.152	0.051	0.043
East Douglas, CO	0.096	0.075	0.073	0.071	0.163	0.064	0.070
Little Book Cliffs, CO	0.059	0.043	0.033	0.044	0.121	0.028	0.024
Mesa, CO	0.044	0.040	0.033	0.042	0.116	0.024	0.019
Sand Wash, CO	0.064	0.037	0.040	0.043	0.151	0.034	0.030
Spring Creek, CO	0.085	0.059	0.042	0.050	0.115	0.052	0.059
Spring Creek Basin, CO	0.076	0.057	0.045	0.046	0.120	0.049	0.056
West Douglas, CO	0.093	0.063	0.051	0.063	0.117	0.050	0.054
West Douglas, CO (2006)	0.089	0.075	0.056	0.070	0.109	0.054	0.059
Black Mountain, ID	0.075	0.073	0.054	0.052	0.151	0.057	0.059
Black Mountain, ID (2010)	0.067	0.057	0.045	0.044	0.153	0.043	0.047
Challis, ID	0.071	0.035	0.034	0.033	0.102	0.028	0.030
Hard Trigger, ID	0.056	0.047	0.039	0.038	0.139	0.037	0.044

continued

TABLE F-2 Continued

	Coppersmith, CA	Fox Hog, CA (2011)	High Rock, CA	Nut Mountain, CA (2011)	Santa Cruz Island, CA	Twin Peaks, CA	Twin Peaks, CA (All, 2011)
Hard Trigger, ID (2010)	0.059	0.053	0.042	0.036	0.148	0.042	0.048
Idaho, ID (BLM)	0.057	0.052	0.049	0.046	0.154	0.045	0.050
Sand Basin, ID	0.056	0.039	0.036	0.041	0.149	0.039	0.042
Saylor Creek, ID	0.064	0.046	0.039	0.036	0.144	0.032	0.035
Pryor Mountains, MT (2001)	0.092	0.062	0.056	0.059	0.145	0.061	0.063
Pryor Mountains, MT (2009)	0.073	0.034	0.031	0.037	0.123	0.034	0.036
Bordo Atravizado, NM	0.059	0.040	0.040	0.046	0.112	0.028	0.031
El Rito, NM	0.059	0.043	0.032	0.044	0.133	0.027	0.032
Jacarilla, NM	0.059	0.039	0.032	0.039	0.135	0.029	0.035
Jarita, NM	0.081	0.066	0.055	0.069	0.157	0.048	0.055
Jicarilla, NM	0.097	0.076	0.070	0.087	0.174	0.056	0.072
Antelope Valley, NV	0.060	0.037	0.035	0.038	0.101	0.026	0.028
Antelope Valley, NV (2011)	0.060	0.044	0.035	0.041	0.109	0.027	0.031
Augusta Mountains, NV	0.061	0.046	0.035	0.048	0.108	0.026	0.029
Bald Mountain, NV	0.050	0.032	0.023	0.030	0.098	0.014	0.016
Black Rock East, NV (2005)	0.072	0.059	0.041	0.040	0.113	0.032	0.031
Black Rock East, NV (2010)	0.064	0.052	0.036	0.038	0.104	0.028	0.029
Black Rock East, NV (2011)	0.061	0.047	0.034	0.040	0.111	0.025	0.028
Black Rock West, NV (2005)	0.067	0.049	0.028	0.027	0.106	0.033	0.034
Black Rock West, NV (2010)	0.068	0.048	0.030	0.031	0.102	0.031	0.031
Black Rock West, NV (2011)	0.081	0.069	0.040	0.043	0.136	0.055	0.053
Buffalo Hills, NV	0.067	0.032	0.048	0.056	0.143	0.038	0.036
Buffalo Hills, NV (2009)	0.063	0.024	0.036	0.049	0.127	0.028	0.029
Calico, NV	0.052	0.008	0.016	0.026	0.111	0.015	0.018
Calico Mountains, NV	0.078	0.022	0.033	0.045	0.132	0.030	0.036
Calico Mountains, NV (2011)	0.067	0.013	0.019	0.030	0.136	0.024	0.023
Callaghan, NV (Austin Allot)	0.052	0.029	0.026	0.036	0.105	0.015	0.018
Callaghan, NV (East Allot)	0.047	0.033	0.022	0.029	0.104	0.017	0.016
Catnip Herd, NV	0.075	0.039	0.035	0.044	0.124	0.036	0.042
Chimney Creek, NV	0.055	0.033	0.032	0.042	0.128	0.033	0.035
Desatoya Mountain, NV	0.094	0.074	0.065	0.071	0.130	0.048	0.064
Dolly Varden, NV	0.057	0.037	0.029	0.036	0.104	0.025	0.031
Dry Lake, NV	0.061	0.034	0.041	0.053	0.137	0.027	0.032
Fish Creek, NV	0.057	0.035	0.028	0.039	0.123	0.021	0.027

Goshute, NV	0.067	0.049	0.046	0.052	0.137	0.034	0.041
Goshute, NV (2011)	0.064	0.048	0.040	0.046	0.133	0.034	0.038
Granite, NV	0.065	0.021	0.027	0.033	0.124	0.018	0.018
Granite Range, NV	0.066	0.019	0.028	0.037	0.118	0.020	0.022
Granite Range, NV (2011)	0.058	0.015	0.021	0.031	0.119	0.015	0.015
Grass Valley, NV	0.059	0.034	0.029	0.039	0.107	0.022	0.028
Hall Creek, NV	0.057	0.037	0.034	0.043	0.107	0.020	0.021
Jakes Wash, NV	0.099	0.073	0.058	0.068	0.136	0.051	0.050
Johnnie, NV	0.074	0.065	0.042	0.050	0.112	0.039	0.045
Lahanton Reservoir, NV	0.070	0.058	0.059	0.060	0.149	0.044	0.048
Little Fish Lake, NV	0.068	0.054	0.050	0.059	0.157	0.037	0.039
Little Highrock Canyon, NV	0.052	0.025	0.031	0.043	0.137	0.029	0.032
Little Humboldt, NV	0.071	0.064	0.060	0.056	0.143	0.040	0.043
Little Humboldt, NV (2010)	0.058	0.044	0.040	0.038	0.120	0.029	0.029
Little Owyhee, NV (Fairbanks)	0.087	0.046	0.045	0.063	0.130	0.041	0.041
Little Owyhee, NV (Lake Creek)	0.065	0.048	0.042	0.054	0.134	0.041	0.045
Little Owyhee, NV (Twin Valley)	0.062	0.038	0.031	0.035	0.115	0.028	0.032
Marvel Gap, NV (SWC 2010)	0.045	0.042	0.033	0.034	0.123	0.025	0.030
McGee Mountain, NV	0.065	0.038	0.032	0.034	0.119	0.027	0.027
Miller Mountain, NV (SWC 2010)	0.053	0.040	0.027	0.037	0.117	0.023	0.021
Montezuma Peak, NV	0.068	0.045	0.044	0.054	0.157	0.042	0.041
Nellis, NV	0.052	0.032	0.028	0.033	0.115	0.019	0.018
New Pass-Ravenswood, NV	0.048	0.027	0.023	0.030	0.090	0.013	0.018
North Stillwater, NV	0.063	0.037	0.030	0.047	0.124	0.034	0.031
Paymaster, NV (2006)	0.077	0.051	0.052	0.055	0.167	0.041	0.041
Paymaster, NV (2010)	0.074	0.044	0.052	0.056	0.167	0.042	0.041
Pine Nut Mountain, NV	0.086	0.063	0.051	0.067	0.140	0.046	0.054
Powell Mountain, NV	0.095	0.069	0.070	0.072	0.156	0.057	0.054
Red Rock, NV	0.068	0.053	0.044	0.052	0.131	0.033	0.033
Reveille, NV	0.067	0.056	0.049	0.054	0.128	0.038	0.029
Roberts Mountain, NV	0.067	0.047	0.032	0.042	0.136	0.031	0.031
Rock Creek, NV (2002)	0.088	0.075	0.055	0.053	0.137	0.051	0.054
Rock Creek, NV (2010)	0.070	0.061	0.044	0.042	0.119	0.038	0.040
Rocky Hills, NV	0.057	0.041	0.032	0.038	0.122	0.022	0.027
Rodeo Creek, NV	0.053	0.032	0.025	0.032	0.111	0.020	0.018
Saulsbery, NV	0.061	0.032	0.033	0.040	0.104	0.024	0.025
Sand Springs East, NV	0.064	0.038	0.033	0.034	0.123	0.027	0.026

continued

TABLE F-2 Continued

	Coppersmith, CA	Fox Hog, CA (2011)	High Rock, CA	Nut Mountain, CA (2011)	Santa Cruz Island, CA	Twin Peaks, CA	Twin Peaks, CA (All, 2011)
Seven Mile, NV	0.073	0.043	0.041	0.045	0.149	0.040	0.045
Shawave Mountains, NV	0.058	0.030	0.031	0.040	0.113	0.022	0.029
Silver Peak, NV	0.073	0.041	0.033	0.045	0.123	0.029	0.030
Snowstorm, NV (Castle Ridge)	0.061	0.050	0.046	0.043	0.141	0.033	0.031
Snowstorm, NV (Dryhill)	0.065	0.062	0.056	0.063	0.153	0.062	0.055
South Shoshone, NV	0.051	0.040	0.028	0.034	0.122	0.023	0.025
Spruce-Pequeop, NV (2011)	0.080	0.055	0.045	0.058	0.106	0.038	0.045
Stillwater, NV	0.064	0.049	0.036	0.052	0.127	0.041	0.038
Stone Cabin, NV	0.058	0.035	0.028	0.033	0.117	0.023	0.023
Warm Springs, NV	0.063	0.041	0.020	0.021	0.120	0.029	0.025
Warm Springs Canyon, NV	0.056	0.030	0.014	0.022	0.098	0.021	0.021
Wheeler Pass, NV	0.087	0.082	0.057	0.066	0.136	0.053	0.055
Wheeler Pass, NV (2007)	0.055	0.042	0.031	0.041	0.122	0.023	0.025
Alvord Tule, OR	0.082	0.038	0.027	0.031	0.097	0.034	0.036
Beatys Butte, OR	0.052	0.028	0.026	0.033	0.112	0.016	0.019
Beatys Butte, OR (2010)	0.047	0.028	0.026	0.030	0.122	0.020	0.027
Big Summit, OR (2010)	0.125	0.117	0.110	0.116	0.182	0.093	0.103
Cold Spring, OR	0.056	0.038	0.029	0.042	0.098	0.021	0.025
Cold Spring, OR (2010)	0.055	0.046	0.036	0.047	0.110	0.025	0.029
Coyote Lake, OR	0.076	0.041	0.034	0.043	0.105	0.031	0.036
Coyote Lake, OR (2011)	0.062	0.031	0.026	0.031	0.098	0.022	0.025
Fishnet, OR	0.062	0.041	0.035	0.043	0.139	0.031	0.026
Hog Creek, OR	0.058	0.037	0.029	0.038	0.109	0.024	0.026
Jackies Butte, OR	0.063	0.044	0.040	0.043	0.126	0.040	0.037
Jackies Butte, OR (2011)	0.055	0.030	0.025	0.029	0.114	0.030	0.027
Kiger, OR (2011)	0.083	0.040	0.044	0.046	0.140	0.031	0.029
Kiger Herd, OR (2009)	0.086	0.044	0.042	0.045	0.134	0.036	0.034
Liggett Table, OR	0.179	0.157	0.131	0.139	0.219	0.142	0.148
Murderers Creek, OR (2001)	0.109	0.082	0.077	0.079	0.166	0.070	0.075
Murderers Creek, OR (2009)	0.098	0.059	0.066	0.071	0.161	0.056	0.062
Paisley Desert, OR	0.049	0.028	0.023	0.030	0.107	0.017	0.015
Riddle Herd, OR (2009)	0.095	0.052	0.047	0.047	0.134	0.040	0.038
Riddle Mountain, OR	0.093	0.054	0.046	0.045	0.126	0.036	0.039
Riddle Mountain, OR (2011)	0.102	0.060	0.053	0.054	0.148	0.046	0.044

continued

Sand Springs, OR (2011)	0.069	0.031	0.032	0.040	0.117	0.021	0.028
Sheepshead, OR	0.073	0.036	0.030	0.037	0.119	0.024	0.032
Sheepshead, OR (2011)	0.059	0.038	0.029	0.036	0.114	0.019	0.023
South Steens, OR	0.053	0.031	0.020	0.028	0.098	0.023	0.027
South Steens, OR (2010)	0.055	0.024	0.019	0.029	0.114	0.025	0.026
Stinkingwater, OR	0.074	0.070	0.048	0.052	0.125	0.051	0.053
Three Fingers, OR	0.075	0.054	0.048	0.049	0.162	0.036	0.036
Three Fingers, OR (2011)	0.069	0.054	0.041	0.041	0.146	0.033	0.034
Warm Springs, OR	0.053	0.033	0.025	0.028	0.110	0.023	0.026
Warm Springs, OR (2010)	0.049	0.033	0.027	0.030	0.108	0.020	0.024
Blawn Wash, UT	0.092	0.066	0.058	0.069	0.158	0.060	0.051
Cedar Mountain, UT	0.070	0.041	0.035	0.049	0.109	0.034	0.034
Cedar Ridge, UT	0.104	0.067	0.067	0.066	0.155	0.059	0.064
Cedar Ridge, UT (trap)	0.107	0.074	0.071	0.074	0.146	0.067	0.068
Cold Springs, UT (2006)	0.104	0.076	0.080	0.087	0.168	0.084	0.091
Cold Springs, UT (trap)	0.088	0.062	0.060	0.066	0.130	0.062	0.062
Delta, UT	0.060	0.038	0.030	0.037	0.109	0.021	0.023
Hill Creek, UT	0.061	0.040	0.037	0.047	0.120	0.032	0.033
Muddy Creek, UT	0.110	0.087	0.085	0.100	0.158	0.071	0.070
North Hills, UT	0.082	0.077	0.077	0.077	0.147	0.053	0.066
Range Creek, UT	0.072	0.038	0.041	0.044	0.124	0.039	0.044
Sinbad, UT	0.110	0.066	0.064	0.071	0.150	0.055	0.064
Sulphur, UT	0.115	0.098	0.100	0.115	0.206	0.083	0.088
Sulphur Herd, UT (South, 2006)	0.081	0.058	0.055	0.063	0.132	0.043	0.052
Tilley Creek, UT	0.084	0.074	0.072	0.077	0.191	0.057	0.050
Winter Ridge, UT	0.055	0.039	0.033	0.041	0.136	0.029	0.034
Adobe Town, WY	0.053	0.047	0.036	0.040	0.121	0.027	0.028
Adobe Town, WY (2011)	0.040	0.030	0.027	0.031	0.119	0.021	0.022
Antelope Hills, WY	0.079	0.040	0.040	0.042	0.116	0.032	0.040
Conant Creek, WY (Lander)	0.095	0.070	0.051	0.068	0.169	0.055	0.045
Cooper Creek, WY	0.062	0.039	0.034	0.042	0.125	0.022	0.025
Dishpan Butte, WY (Lander)	0.075	0.062	0.042	0.049	0.143	0.035	0.033
Divide Basin, WY	0.051	0.027	0.024	0.026	0.103	0.013	0.020
Divide Basin, WY (2011)	0.052	0.033	0.027	0.033	0.112	0.016	0.022
Eagles Nest, WY	0.085	0.068	0.050	0.057	0.129	0.047	0.053
Happy Creek Springs, WY	0.081	0.051	0.047	0.054	0.154	0.038	0.046
Little Colorado, WY	0.063	0.046	0.031	0.035	0.117	0.031	0.033

TABLE F-2 Continued

	Coppersmith, CA	Fox Hog, CA (2011)	High Rock, CA	Nut Mountain, CA (2011)	Santa Cruz Island, CA	Twin Peaks, CA (All, 2011)
Little Colorado, WY (2011)	0.055	0.038	0.026	0.029	0.117	0.028
Lost Creek, WY	0.057	0.035	0.025	0.031	0.105	0.027
Lost Creek, WY (combined)	0.060	0.038	0.024	0.033	0.110	0.027
McCullough Peaks, WY	0.065	0.044	0.029	0.036	0.133	0.034
Musktrat Basin, WY (Lander)	0.082	0.064	0.047	0.054	0.136	0.037
Salt Wells, WY (East)	0.043	0.028	0.023	0.030	0.111	0.021
Salt Wells, WY (West)	0.059	0.041	0.033	0.041	0.110	0.020
Stewart Creek, WY	0.077	0.041	0.031	0.038	0.113	0.037
Stewart Creek, WY (2009)	0.072	0.048	0.037	0.039	0.133	0.036
White Mountain, WY (2011)	0.059	0.033	0.033	0.035	0.149	0.027

	Twin Peaks, CA (Gilman SP)	Twin Peaks, CA (S Observa)	Twin Peaks, CA (Skeddle)	Wall Canyon, CA (2011)	Barcus Creek, CO	East Douglas, CO	Little Book Cliffs, CO
Twin Peaks, CA (Gilman SP)	0.000						
Twin Peaks, CA (S Observa)	0.023	0.000					
Twin Peaks, CA (Skeddle)	0.016	0.016	0.000	0.000			
Wall Canyon, CA (2011)	0.043	0.042	0.043	0.073			
Barcus Creek, CO	0.056	0.047	0.048	0.073	0.000		
East Douglas, CO	0.073	0.073	0.079	0.077	0.094	0.000	
Little Book Cliffs, CO	0.039	0.025	0.032	0.060	0.048	0.089	0.000
Mesa, CO	0.032	0.023	0.022	0.048	0.035	0.074	0.030
Sand Wash, CO	0.035	0.035	0.037	0.065	0.059	0.067	0.045
Spring Creek, CO	0.060	0.062	0.070	0.059	0.087	0.106	0.067
Spring Creek Basin, CO	0.059	0.058	0.067	0.060	0.087	0.099	0.071
West Douglas, CO	0.052	0.062	0.059	0.067	0.096	0.076	0.076
West Douglas, CO (2006)	0.059	0.065	0.065	0.072	0.105	0.094	0.076
Black Mountain, ID	0.069	0.060	0.071	0.067	0.096	0.082	0.077
Black Mountain, ID (2010)	0.056	0.048	0.058	0.060	0.075	0.080	0.059
Challis, ID	0.041	0.032	0.039	0.044	0.066	0.070	0.047
Hard Trigger, ID	0.043	0.048	0.055	0.054	0.091	0.076	0.062
Hard Trigger, ID (2010)	0.051	0.053	0.057	0.056	0.090	0.080	0.066
Idaho, ID (BLM)	0.053	0.053	0.060	0.068	0.085	0.086	0.063
Sand Basin, ID	0.046	0.046	0.049	0.066	0.075	0.103	0.053

continued

Saylor Creek, ID	0.039	0.039	0.044	0.052	0.070	0.060	0.059
Pryor Mountains, MT (2001)	0.063	0.071	0.065	0.070	0.094	0.079	0.067
Pryor Mountains, MT (2009)	0.035	0.044	0.040	0.049	0.073	0.075	0.058
Bordo Atravizado, NM	0.035	0.034	0.039	0.051	0.063	0.078	0.047
El Rito, NM	0.032	0.037	0.039	0.060	0.063	0.081	0.040
Jacarilla, NM	0.032	0.041	0.044	0.059	0.076	0.076	0.046
Jarita, NM	0.055	0.060	0.065	0.082	0.088	0.105	0.067
Jicarilla, NM	0.077	0.074	0.085	0.101	0.101	0.125	0.073
Antelope Valley, NV	0.039	0.031	0.036	0.057	0.059	0.086	0.035
Antelope Valley, NV (2011)	0.038	0.035	0.038	0.055	0.060	0.086	0.036
Augusta Mountains, NV	0.034	0.034	0.035	0.056	0.057	0.067	0.046
Bald Mountain, NV	0.025	0.020	0.020	0.036	0.046	0.063	0.030
Black Rock East, NV (2005)	0.047	0.033	0.038	0.038	0.071	0.074	0.059
Black Rock East, NV (2010)	0.040	0.031	0.036	0.035	0.068	0.071	0.056
Black Rock East, NV (2011)	0.034	0.031	0.036	0.039	0.065	0.057	0.052
Black Rock West, NV (2005)	0.045	0.038	0.038	0.021	0.078	0.074	0.066
Black Rock West, NV (2010)	0.046	0.035	0.034	0.027	0.073	0.081	0.061
Black Rock West, NV (2011)	0.061	0.060	0.054	0.033	0.102	0.118	0.083
Buffalo Hills, NV	0.043	0.041	0.043	0.074	0.050	0.102	0.048
Buffalo Hills, NV (2009)	0.031	0.034	0.037	0.063	0.048	0.081	0.040
Calico, NV	0.028	0.020	0.026	0.039	0.047	0.068	0.032
Calico Mountains, NV	0.039	0.039	0.046	0.062	0.059	0.080	0.049
Calico Mountains, NV (2011)	0.030	0.027	0.031	0.043	0.046	0.075	0.036
Callaghan, NV (Austin Allot)	0.022	0.022	0.025	0.046	0.048	0.055	0.038
Callaghan, NV (East Allot)	0.024	0.021	0.022	0.037	0.051	0.070	0.031
Catnip Herd, NV	0.044	0.049	0.046	0.053	0.070	0.074	0.070
Chimney Creek, NV	0.041	0.042	0.039	0.045	0.076	0.064	0.059
Desatoya Mountain, NV	0.064	0.070	0.071	0.078	0.114	0.079	0.093
Dolly Varden, NV	0.037	0.036	0.036	0.047	0.058	0.089	0.040
Dry Lake, NV	0.040	0.036	0.037	0.066	0.075	0.071	0.056
Fish Creek, NV	0.031	0.031	0.033	0.054	0.063	0.075	0.041
Goshute, NV	0.049	0.046	0.047	0.062	0.078	0.095	0.057
Goshute, NV (2011)	0.045	0.044	0.041	0.057	0.071	0.093	0.057
Granite, NV	0.026	0.020	0.027	0.044	0.048	0.073	0.038
Granite Range, NV	0.030	0.023	0.033	0.055	0.059	0.088	0.037
Granite Range, NV (2011)	0.024	0.018	0.023	0.047	0.044	0.080	0.030
Grass Valley, NV	0.029	0.033	0.034	0.046	0.057	0.067	0.045

TABLE F-2 Continued

	Twin Peaks, CA (Gilman SP)	Twin Peaks, CA (S Observa)	Twin Peaks, CA (Skeddle)	Wall Canyon, CA (2011)	Barcus Creek, CO	East Douglas, CO	Little Book Cliffs, CO
Hall Creek, NV	0.028	0.024	0.030	0.051	0.053	0.056	0.042
Jakes Wash, NV	0.063	0.055	0.051	0.080	0.080	0.094	0.068
Johannie, NV	0.047	0.048	0.056	0.054	0.078	0.081	0.050
Lahanton Reservoir, NV	0.058	0.054	0.051	0.078	0.098	0.089	0.076
Little Fish Lake, NV	0.037	0.046	0.046	0.068	0.076	0.077	0.059
Little Highrock Canyon, NV	0.042	0.034	0.041	0.063	0.067	0.095	0.038
Little Humboldt, NV	0.051	0.044	0.054	0.076	0.076	0.089	0.058
Little Humboldt, NV (2010)	0.041	0.030	0.040	0.062	0.067	0.070	0.042
Little Owyhee, NV (Fairbanks)	0.044	0.045	0.050	0.064	0.066	0.082	0.058
Little Owyhee, NV (Lake Creek)	0.044	0.049	0.054	0.061	0.078	0.080	0.057
Little Owyhee, NV (Twin Valley)	0.039	0.035	0.040	0.047	0.073	0.086	0.049
Marvel Gap, NV (SWC 2010)	0.032	0.034	0.039	0.051	0.053	0.064	0.045
McGee Mountain, NV	0.031	0.032	0.034	0.043	0.066	0.065	0.052
Miller Mountain, NV (SWC 2010)	0.025	0.027	0.026	0.045	0.057	0.067	0.038
Montezuma Peak, NV	0.046	0.048	0.045	0.073	0.075	0.125	0.060
Nellis, NV	0.026	0.023	0.023	0.042	0.054	0.064	0.043
New Pass-Ravenswood, NV	0.031	0.021	0.025	0.038	0.058	0.056	0.038
North Stillwater, NV	0.034	0.038	0.035	0.059	0.051	0.092	0.038
Paymaster, NV (2006)	0.050	0.046	0.046	0.077	0.075	0.114	0.059
Paymaster, NV (2010)	0.049	0.047	0.044	0.079	0.074	0.115	0.063
Pine Nut Mountain, NV	0.064	0.057	0.062	0.076	0.082	0.097	0.061
Powell Mountain, NV	0.067	0.055	0.064	0.093	0.088	0.079	0.075
Red Rock, NV	0.036	0.038	0.039	0.059	0.060	0.101	0.040
Reveille, NV	0.036	0.034	0.033	0.060	0.084	0.080	0.057
Roberts Mountain, NV	0.039	0.035	0.039	0.048	0.054	0.068	0.046
Rock Creek, NV (2002)	0.070	0.054	0.066	0.080	0.092	0.096	0.066
Rock Creek, NV (2010)	0.050	0.043	0.049	0.065	0.073	0.073	0.057
Rocky Hills, NV	0.036	0.031	0.033	0.054	0.067	0.069	0.048
Rodeo Creek, NV	0.025	0.022	0.025	0.048	0.057	0.081	0.030
Saulsbery, NV	0.032	0.032	0.026	0.048	0.064	0.061	0.043
Sand Springs East, NV	0.030	0.030	0.033	0.045	0.065	0.065	0.050
Seven Mile, NV	0.045	0.052	0.050	0.062	0.073	0.081	0.056
Shawave Mountains, NV	0.034	0.030	0.040	0.051	0.063	0.071	0.039
Silver Peak, NV	0.039	0.035	0.035	0.056	0.058	0.089	0.050

continued

Snowstorm, NV (Castle Ridge)	0.051	0.031	0.039	0.070	0.070	0.075	0.050
Snowstorm, NV (Dryhill)	0.064	0.060	0.060	0.076	0.072	0.126	0.075
South Shoshone, NV	0.031	0.030	0.033	0.046	0.052	0.070	0.038
Spruce-Peupop, NV (2011)	0.051	0.051	0.050	0.063	0.083	0.104	0.055
Stillwater, NV	0.043	0.044	0.041	0.066	0.068	0.105	0.045
Stone Cabin, NV	0.030	0.028	0.027	0.044	0.057	0.072	0.037
Warm Springs, NV	0.036	0.028	0.030	0.016	0.063	0.076	0.050
Warm Springs Canyon, NV	0.027	0.027	0.026	0.018	0.065	0.071	0.043
Wheeler Pass, NV	0.054	0.062	0.061	0.076	0.092	0.111	0.066
Wheeler Pass, NV (2007)	0.030	0.028	0.035	0.050	0.048	0.067	0.035
Alvord Tule, OR	0.042	0.039	0.043	0.041	0.053	0.067	0.053
Beatys Butte, OR	0.026	0.024	0.024	0.044	0.057	0.059	0.038
Beatys Butte, OR (2010)	0.029	0.031	0.034	0.039	0.065	0.064	0.043
Big Summit, OR (2010)	0.112	0.104	0.116	0.138	0.136	0.170	0.117
Cold Spring, OR	0.036	0.028	0.032	0.051	0.064	0.071	0.043
Cold Spring, OR (2010)	0.036	0.032	0.036	0.060	0.069	0.083	0.045
Coyote Lake, OR	0.039	0.042	0.041	0.052	0.062	0.070	0.056
Coyote Lake, OR (2011)	0.030	0.029	0.032	0.045	0.052	0.061	0.047
Fishnet, OR	0.035	0.033	0.027	0.057	0.052	0.075	0.044
Hog Creek, OR	0.031	0.030	0.034	0.049	0.067	0.080	0.045
Jackies Butte, OR	0.043	0.043	0.041	0.056	0.068	0.070	0.067
Jackies Butte, OR (2011)	0.032	0.033	0.032	0.040	0.060	0.078	0.049
Kiger, OR (2011)	0.036	0.034	0.036	0.062	0.060	0.077	0.043
Kiger Herd, OR (2009)	0.040	0.039	0.041	0.055	0.060	0.071	0.048
Liggett Table, OR	0.144	0.159	0.148	0.137	0.219	0.210	0.189
Murderers Creek, OR (2001)	0.075	0.082	0.079	0.098	0.108	0.112	0.084
Murderers Creek, OR (2009)	0.064	0.070	0.066	0.090	0.096	0.089	0.075
Paisley Desert, OR	0.016	0.021	0.022	0.043	0.048	0.063	0.032
Riddle Herd, OR (2009)	0.048	0.041	0.045	0.059	0.080	0.096	0.052
Riddle Mountain, OR	0.051	0.041	0.046	0.059	0.089	0.093	0.055
Riddle Mountain, OR (2011)	0.056	0.046	0.052	0.067	0.083	0.103	0.053
Sand Springs, OR (2011)	0.039	0.029	0.039	0.057	0.056	0.076	0.046
Sheepshead, OR	0.036	0.035	0.042	0.053	0.058	0.062	0.038
Sheepshead, OR (2011)	0.034	0.024	0.033	0.053	0.054	0.063	0.031
South Steens, OR	0.028	0.031	0.035	0.035	0.051	0.071	0.037
South Steens, OR (2010)	0.029	0.032	0.033	0.036	0.056	0.074	0.039
Stinkingwater, OR	0.057	0.060	0.058	0.054	0.096	0.067	0.087

TABLE F-2 Continued

	Twin Peaks, CA (Gilman SP)	Twin Peaks, CA (S Observa)	Twin Peaks, CA (Skeddle)	CA	Wall Canyon, CA (2011)	Barcus Creek, CO	East Douglas, CO	Little Book Cliffs, CO
Three Fingers, OR	0.051	0.038	0.045	0.065	0.059	0.079	0.059	0.059
Three Fingers, OR (2011)	0.043	0.037	0.042	0.055	0.053	0.069	0.059	0.059
Warm Springs, OR	0.032	0.032	0.029	0.040	0.059	0.060	0.047	0.047
Warm Springs, OR (2010)	0.031	0.030	0.028	0.038	0.058	0.061	0.049	0.049
Blawn Wash, UT	0.076	0.056	0.049	0.080	0.091	0.112	0.062	0.062
Cedar Mountain, UT	0.039	0.041	0.038	0.058	0.068	0.090	0.044	0.044
Cedar Ridge, UT	0.070	0.067	0.075	0.091	0.099	0.112	0.090	0.090
Cedar Ridge, UT (trap)	0.072	0.070	0.080	0.098	0.097	0.137	0.084	0.084
Cold Springs, UT (2006)	0.106	0.097	0.092	0.086	0.111	0.141	0.110	0.110
Cold Springs, UT (trap)	0.073	0.067	0.065	0.064	0.080	0.114	0.072	0.072
Delta, UT	0.028	0.025	0.034	0.050	0.049	0.065	0.029	0.029
Hill Creek, UT	0.030	0.038	0.041	0.062	0.052	0.093	0.035	0.035
Muddy Creek, UT	0.078	0.075	0.075	0.105	0.099	0.144	0.090	0.090
North Hills, UT	0.064	0.071	0.074	0.095	0.107	0.096	0.082	0.082
Range Creek, UT	0.054	0.048	0.050	0.056	0.069	0.090	0.066	0.066
Sinbad, UT	0.073	0.066	0.076	0.086	0.103	0.104	0.067	0.067
Sulphur, UT	0.097	0.090	0.099	0.126	0.120	0.117	0.106	0.106
Sulphur Herd, UT (South, 2006)	0.058	0.050	0.069	0.080	0.079	0.098	0.058	0.058
Tilley Creek, UT	0.068	0.051	0.060	0.107	0.096	0.125	0.058	0.058
Winter Ridge, UT	0.032	0.039	0.043	0.056	0.056	0.074	0.040	0.040
Adobe Town, WY	0.026	0.032	0.036	0.059	0.067	0.073	0.044	0.044
Adobe Town, WY (2011)	0.025	0.026	0.029	0.049	0.054	0.078	0.033	0.033
Antelope Hills, WY	0.045	0.042	0.052	0.057	0.086	0.068	0.060	0.060
Conant Creek, WY (Lander)	0.062	0.047	0.052	0.076	0.075	0.113	0.048	0.048
Cooper Creek, WY	0.031	0.028	0.034	0.053	0.061	0.064	0.044	0.044
Dishpan Butte, WY (Lander)	0.037	0.035	0.046	0.061	0.068	0.083	0.053	0.053
Divide Basin, WY	0.025	0.024	0.027	0.043	0.061	0.061	0.036	0.036
Divide Basin, WY (2011)	0.028	0.025	0.030	0.048	0.060	0.067	0.036	0.036
Eagles Nest, WY	0.062	0.055	0.063	0.067	0.093	0.101	0.071	0.071
Happy Creek Springs, WY	0.047	0.052	0.052	0.069	0.086	0.072	0.068	0.068
Little Colorado, WY	0.038	0.036	0.041	0.044	0.064	0.072	0.053	0.053
Little Colorado, WY (2011)	0.032	0.033	0.034	0.042	0.060	0.066	0.048	0.048
Lost Creek, WY	0.033	0.030	0.034	0.041	0.060	0.064	0.041	0.041
Lost Creek, WY (combined)	0.032	0.030	0.037	0.040	0.060	0.071	0.039	0.039

	Mesa, CO	Sand Wash, CO	Spring Creek, CO	Spring Creek Basin, CO	West Douglas, CO	West Douglas, CO (2006)	Black Mountain, ID
McCullough Peaks, WY	0.043	0.036	0.044	0.044	0.074	0.063	0.048
Muskkrat Basin, WY (Lander)	0.047	0.038	0.047	0.064	0.056	0.084	0.056
Salt Wells, WY (East)	0.023	0.029	0.024	0.046	0.056	0.069	0.037
Salt Wells, WY (West)	0.035	0.021	0.029	0.050	0.058	0.064	0.034
Stewart Creek, WY	0.045	0.039	0.046	0.047	0.061	0.070	0.051
Stewart Creek, WY (2009)	0.038	0.040	0.044	0.048	0.078	0.072	0.051
White Mountain, WY (2011)	0.035	0.030	0.036	0.051	0.063	0.077	0.042
Mesa, CO	0.000						
Sand Wash, CO	0.042	0.000					
Spring Creek, CO	0.062	0.083	0.000				
Spring Creek Basin, CO	0.060	0.078	0.013	0.000	0.000		
West Douglas, CO	0.070	0.064	0.072	0.073	0.000		
West Douglas, CO (2006)	0.072	0.078	0.071	0.075	0.011	0.000	
Black Mountain, ID	0.066	0.060	0.080	0.077	0.092	0.097	0.000
Black Mountain, ID (2010)	0.051	0.042	0.072	0.075	0.073	0.082	0.018
Challis, ID	0.044	0.040	0.061	0.062	0.058	0.071	0.066
Hard Trigger, ID	0.057	0.041	0.072	0.068	0.076	0.083	0.036
Hard Trigger, ID (2010)	0.057	0.046	0.073	0.068	0.079	0.086	0.035
Idaho, ID (BLM)	0.054	0.047	0.087	0.079	0.080	0.082	0.048
Sand Basin, ID	0.051	0.037	0.083	0.077	0.071	0.079	0.059
Saylor Creek, ID	0.051	0.038	0.079	0.076	0.054	0.071	0.055
Pryor Mountains, MT (2001)	0.067	0.069	0.110	0.096	0.079	0.091	0.105
Pryor Mountains, MT (2009)	0.047	0.042	0.080	0.072	0.057	0.071	0.077
Bordo Atravizado, NM	0.041	0.046	0.075	0.069	0.067	0.074	0.071
El Rito, NM	0.042	0.039	0.073	0.068	0.059	0.065	0.074
Jacarilla, NM	0.053	0.044	0.081	0.077	0.061	0.070	0.082
Jarita, NM	0.070	0.067	0.100	0.101	0.085	0.090	0.103
Jicarilla, NM	0.083	0.079	0.104	0.110	0.106	0.111	0.106
Antelope Valley, NV	0.033	0.034	0.069	0.066	0.062	0.068	0.057
Antelope Valley, NV (2011)	0.034	0.044	0.061	0.058	0.062	0.066	0.064
Augusta Mountains, NV	0.035	0.045	0.074	0.071	0.061	0.067	0.063
Bald Mountain, NV	0.026	0.037	0.060	0.058	0.050	0.057	0.067
Black Rock East, NV (2005)	0.039	0.058	0.085	0.082	0.074	0.084	0.072

continued

TABLE F-2 Continued

	Mesa, CO	Sand Wash, CO	Spring Creek, CO	Spring Creek Basin, CO	West Douglas, CO	West Douglas, CO (2006)	Black Mountain, ID
Black Rock East, NV (2010)	0.036	0.062	0.070	0.067	0.067	0.074	0.069
Black Rock East, NV (2011)	0.035	0.052	0.064	0.062	0.051	0.060	0.055
Black Rock West, NV (2005)	0.043	0.065	0.070	0.062	0.069	0.077	0.069
Black Rock West, NV (2010)	0.040	0.064	0.070	0.064	0.069	0.074	0.070
Black Rock West, NV (2011)	0.061	0.089	0.092	0.084	0.096	0.097	0.093
Buffalo Hills, NV	0.044	0.048	0.076	0.076	0.086	0.097	0.096
Buffalo Hills, NV (2009)	0.040	0.034	0.072	0.072	0.066	0.078	0.086
Calico, NV	0.027	0.032	0.054	0.053	0.063	0.073	0.064
Calico Mountains, NV	0.049	0.047	0.073	0.071	0.073	0.086	0.080
Calico Mountains, NV (2011)	0.036	0.037	0.067	0.066	0.070	0.082	0.071
Callaghan, NV (Austin Allot)	0.030	0.028	0.056	0.056	0.049	0.059	0.053
Callaghan, NV (East Allot)	0.028	0.034	0.047	0.044	0.048	0.053	0.061
Catnip Herd, NV	0.046	0.057	0.062	0.054	0.058	0.074	0.083
Chimney Creek, NV	0.042	0.044	0.087	0.083	0.064	0.082	0.071
Desatoya Mountain, NV	0.088	0.086	0.098	0.097	0.067	0.082	0.109
Dolly Varden, NV	0.034	0.045	0.068	0.065	0.064	0.065	0.066
Dry Lake, NV	0.045	0.045	0.083	0.084	0.049	0.064	0.072
Fish Creek, NV	0.040	0.043	0.063	0.064	0.071	0.082	0.061
Goshute, NV	0.048	0.054	0.083	0.069	0.080	0.085	0.080
Goshute, NV (2011)	0.047	0.051	0.081	0.067	0.074	0.078	0.076
Granite, NV	0.034	0.036	0.071	0.070	0.080	0.090	0.076
Granite Range, NV	0.036	0.039	0.067	0.066	0.072	0.081	0.080
Granite Range, NV (2011)	0.024	0.030	0.062	0.063	0.069	0.077	0.070
Grass Valley, NV	0.038	0.040	0.053	0.053	0.045	0.054	0.066
Hall Creek, NV	0.035	0.032	0.067	0.065	0.049	0.061	0.058
Jakes Wash, NV	0.066	0.071	0.097	0.096	0.071	0.083	0.093
Johnnie, NV	0.057	0.070	0.058	0.069	0.057	0.060	0.065
Lahanton Reservoir, NV	0.060	0.066	0.089	0.073	0.081	0.090	0.092
Little Fish Lake, NV	0.049	0.041	0.088	0.080	0.067	0.075	0.083
Little Highrock Canyon, NV	0.041	0.043	0.078	0.073	0.065	0.066	0.078
Little Humboldt, NV	0.056	0.049	0.095	0.090	0.083	0.090	0.078
Little Humboldt, NV (2010)	0.044	0.039	0.077	0.072	0.072	0.076	0.070
Little Owyhee, NV (Fairbanks)	0.049	0.060	0.089	0.088	0.077	0.088	0.082
Little Owyhee, NV (Lake Creek)	0.049	0.046	0.081	0.078	0.077	0.088	0.072

continued

Little Owyhee, NV (Twin Valley)	0.048	0.059	0.076	0.072	0.077	0.081	0.063
Marvel Gap, NV (SWC 2010)	0.037	0.035	0.055	0.051	0.059	0.068	0.049
McC Gee Mountain, NV	0.042	0.042	0.071	0.064	0.051	0.066	0.065
Miller Mountain, NV (SWC 2010)	0.037	0.037	0.072	0.068	0.062	0.071	0.062
Montezuma Peak, NV	0.052	0.054	0.083	0.074	0.088	0.090	0.085
Nellis, NV	0.029	0.034	0.057	0.056	0.057	0.068	0.064
New Pass-Ravenswood, NV	0.031	0.038	0.053	0.051	0.040	0.045	0.052
North Stillwater, NV	0.043	0.037	0.074	0.072	0.068	0.076	0.075
Paymaster, NV (2006)	0.055	0.049	0.090	0.084	0.082	0.087	0.080
Paymaster, NV (2010)	0.053	0.048	0.089	0.082	0.079	0.085	0.083
Pine Nut Mountain, NV	0.069	0.079	0.087	0.099	0.080	0.093	0.093
Powell Mountain, NV	0.058	0.052	0.113	0.101	0.084	0.098	0.077
Red Rock, NV	0.039	0.061	0.075	0.073	0.065	0.068	0.075
Reveille, NV	0.055	0.056	0.092	0.088	0.076	0.089	0.080
Roberts Mountain, NV	0.034	0.049	0.065	0.063	0.069	0.078	0.064
Rock Creek, NV (2002)	0.065	0.079	0.070	0.071	0.079	0.081	0.080
Rock Creek, NV (2010)	0.053	0.056	0.066	0.062	0.062	0.066	0.062
Rocky Hills, NV	0.036	0.045	0.056	0.054	0.043	0.051	0.063
Rodeo Creek, NV	0.035	0.031	0.057	0.056	0.049	0.053	0.073
Saulsbery, NV	0.041	0.032	0.072	0.071	0.041	0.052	0.071
Sand Springs East, NV	0.042	0.039	0.074	0.066	0.055	0.070	0.063
Seven Mile, NV	0.054	0.051	0.065	0.062	0.048	0.065	0.075
Shawave Mountains, NV	0.044	0.036	0.066	0.062	0.061	0.069	0.067
Silver Peak, NV	0.047	0.052	0.073	0.077	0.079	0.083	0.086
Snowstorm, NV (Castle Ridge)	0.045	0.042	0.086	0.076	0.081	0.090	0.072
Snowstorm, NV (Dryhill)	0.061	0.083	0.102	0.092	0.122	0.124	0.099
South Shoshone, NV	0.034	0.031	0.058	0.053	0.052	0.057	0.048
Spruce-Pequop, NV (2011)	0.052	0.066	0.086	0.085	0.072	0.076	0.077
Stillwater, NV	0.050	0.050	0.086	0.082	0.079	0.083	0.080
Stone Cabin, NV	0.030	0.033	0.064	0.064	0.055	0.065	0.064
Warm Springs, NV	0.037	0.052	0.071	0.067	0.074	0.081	0.074
Warm Springs Canyon, NV	0.036	0.046	0.060	0.056	0.053	0.060	0.066
Wheeler Pass, NV	0.073	0.085	0.085	0.095	0.080	0.078	0.090
Wheeler Pass, NV (2007)	0.031	0.035	0.066	0.068	0.050	0.056	0.054
Alvord Tule, OR	0.051	0.046	0.059	0.061	0.050	0.062	0.075
Beatys Butte, OR	0.026	0.034	0.061	0.059	0.051	0.060	0.061
Beatys Butte, OR (2010)	0.035	0.035	0.071	0.066	0.066	0.073	0.058

TABLE F-2 Continued

	Mesa, CO	Sand Wash, CO	Spring Creek, CO	Spring Creek Basin, CO	West Douglas, CO	West Douglas, CO (2006)	Black Mountain, ID
Big Summit, OR (2010)	0.125	0.117	0.143	0.146	0.143	0.136	0.149
Cold Spring, OR	0.033	0.047	0.053	0.055	0.047	0.047	0.054
Cold Spring, OR (2010)	0.040	0.051	0.061	0.062	0.060	0.053	0.062
Coyote Lake, OR	0.052	0.049	0.062	0.062	0.057	0.071	0.071
Coyote Lake, OR (2011)	0.039	0.034	0.059	0.057	0.055	0.068	0.058
Fishnet, OR	0.034	0.043	0.074	0.072	0.074	0.088	0.075
Hog Creek, OR	0.039	0.050	0.054	0.059	0.063	0.066	0.066
Jackies Butte, OR	0.050	0.054	0.079	0.074	0.059	0.070	0.067
Jackies Butte, OR (2011)	0.040	0.049	0.064	0.061	0.053	0.062	0.061
Kiger, OR (2011)	0.042	0.043	0.075	0.076	0.070	0.085	0.096
Kiger Herd, OR (2009)	0.048	0.053	0.068	0.073	0.073	0.083	0.093
Liggett Table, OR	0.168	0.199	0.173	0.162	0.195	0.199	0.188
Murderers Creek, OR (2001)	0.074	0.082	0.089	0.085	0.109	0.111	0.113
Murderers Creek, OR (2009)	0.062	0.059	0.086	0.079	0.087	0.097	0.104
Paisley Desert, OR	0.029	0.031	0.055	0.054	0.048	0.055	0.052
Riddle Herd, OR (2009)	0.054	0.057	0.082	0.085	0.082	0.092	0.099
Riddle Mountain, OR	0.055	0.058	0.084	0.083	0.067	0.078	0.090
Riddle Mountain, OR (2011)	0.059	0.064	0.087	0.092	0.087	0.097	0.104
Sand Springs, OR (2011)	0.042	0.033	0.077	0.073	0.065	0.076	0.063
Sheepshead, OR	0.038	0.034	0.058	0.058	0.049	0.061	0.057
Sheepshead, OR (2011)	0.034	0.032	0.058	0.056	0.045	0.053	0.054
South Steens, OR	0.038	0.040	0.048	0.048	0.046	0.056	0.054
South Steens, OR (2010)	0.038	0.041	0.057	0.056	0.051	0.063	0.061
Stinkingwater, OR	0.058	0.076	0.072	0.069	0.065	0.072	0.070
Three Fingers, OR	0.043	0.042	0.081	0.078	0.085	0.102	0.066
Three Fingers, OR (2011)	0.038	0.043	0.073	0.071	0.070	0.083	0.052
Warm Springs, OR	0.034	0.040	0.062	0.058	0.041	0.050	0.042
Warm Springs, OR (2010)	0.032	0.040	0.064	0.061	0.047	0.055	0.048
Blawn Wash, UT	0.055	0.079	0.113	0.112	0.084	0.089	0.094
Cedar Mountain, UT	0.048	0.059	0.074	0.081	0.072	0.079	0.080
Cedar Ridge, UT	0.073	0.062	0.074	0.076	0.093	0.100	0.096
Cedar Ridge, UT (trap)	0.079	0.070	0.074	0.083	0.101	0.101	0.106
Cold Springs, UT (2006)	0.084	0.111	0.118	0.118	0.132	0.140	0.123
Cold Springs, UT (trap)	0.054	0.082	0.090	0.091	0.089	0.095	0.098

Delta, UT	0.032	0.034	0.054	0.057	0.057	0.057	0.062
Hill Creek, UT	0.044	0.044	0.064	0.067	0.070	0.070	0.078
Muddy Creek, UT	0.087	0.102	0.111	0.104	0.097	0.097	0.132
North Hills, UT	0.067	0.081	0.087	0.089	0.083	0.083	0.100
Range Creek, UT	0.045	0.051	0.060	0.062	0.077	0.077	0.075
Simbad, UT	0.081	0.073	0.118	0.122	0.088	0.088	0.112
Sulphur, UT	0.097	0.090	0.150	0.150	0.122	0.122	0.135
Sulphur Herd, UT (South, 2006)	0.074	0.067	0.089	0.089	0.084	0.084	0.097
Tilley Creek, UT	0.057	0.065	0.102	0.104	0.109	0.109	0.091
Winter Ridge, UT	0.043	0.039	0.058	0.061	0.077	0.077	0.064
Adobe Town, WY	0.044	0.038	0.066	0.062	0.064	0.064	0.053
Adobe Town, WY (2011)	0.032	0.031	0.059	0.054	0.064	0.064	0.051
Antelope Hills, WY	0.056	0.048	0.070	0.067	0.070	0.070	0.089
Conant Creek, WY (Lander)	0.050	0.058	0.097	0.098	0.102	0.102	0.094
Cooper Creek, WY	0.043	0.039	0.071	0.072	0.054	0.054	0.066
Dishpan Butte, WY (Lander)	0.048	0.051	0.074	0.072	0.071	0.071	0.075
Divide Basin, WY	0.034	0.029	0.052	0.049	0.048	0.048	0.059
Divide Basin, WY (2011)	0.031	0.031	0.056	0.055	0.054	0.054	0.062
Eagles Nest, WY	0.069	0.065	0.077	0.069	0.081	0.081	0.093
Happy Creek Springs, WY	0.065	0.056	0.080	0.080	0.071	0.071	0.084
Little Colorado, WY	0.036	0.053	0.051	0.050	0.054	0.054	0.050
Little Colorado, WY (2011)	0.031	0.048	0.047	0.045	0.051	0.051	0.049
Lost Creek, WY	0.040	0.037	0.058	0.056	0.054	0.054	0.067
Lost Creek, WY (combined)	0.042	0.040	0.058	0.055	0.048	0.048	0.068
McCullough Peaks, WY	0.044	0.047	0.075	0.073	0.069	0.069	0.067
Muskkrat Basin, WY (Lander)	0.044	0.054	0.075	0.074	0.077	0.077	0.078
Salt Wells, WY (East)	0.029	0.030	0.061	0.057	0.049	0.049	0.058
Salt Wells, WY (West)	0.035	0.038	0.066	0.063	0.061	0.061	0.054
Stewart Creek, WY	0.055	0.050	0.064	0.064	0.056	0.056	0.082
Stewart Creek, WY (2009)	0.059	0.039	0.076	0.070	0.058	0.058	0.068
White Mountain, WY (2011)	0.038	0.033	0.076	0.068	0.076	0.076	0.075
Black Mountain, ID (2010)	0.000						
Black Mountain, ID (2010)	0.000						
		Challis, ID	Hard Trigger, ID	Hard Trigger, ID (2010)	Idaho, ID (BLM)	Sand Basin, ID	Saylor Creek, ID

continued

TABLE F-2 Continued

	Black Mountain, ID (2010)	Challis, ID	Hard Trigger, ID	Hard Trigger, ID (2010)	Idaho, ID (BLM)	Sand Basin, ID	Saylor Creek, ID
Challis, ID	0.049	0.000					
Hard Trigger, ID	0.035	0.044	0.000				
Hard Trigger, ID (2010)	0.036	0.051	0.013	0.000			
Idaho, ID (BLM)	0.041	0.054	0.033	0.032	0.000		
Sand Basin, ID	0.041	0.051	0.037	0.033	0.033	0.000	
Saylor Creek, ID	0.040	0.034	0.035	0.032	0.043	0.044	0.000
Pryor Mountains, MT (2001)	0.088	0.065	0.073	0.079	0.070	0.071	0.061
Pryor Mountains, MT (2009)	0.060	0.044	0.047	0.052	0.061	0.042	0.041
Bordo Atravizado, NM	0.057	0.035	0.046	0.053	0.050	0.057	0.040
El Rito, NM	0.057	0.051	0.043	0.052	0.052	0.041	0.047
Jacarilla, NM	0.065	0.050	0.047	0.056	0.062	0.044	0.046
Jarita, NM	0.081	0.071	0.073	0.085	0.083	0.073	0.072
Jicarilla, NM	0.082	0.088	0.085	0.094	0.090	0.081	0.083
Antelope Valley, NV	0.041	0.034	0.044	0.052	0.051	0.039	0.045
Antelope Valley, NV (2011)	0.048	0.042	0.048	0.059	0.056	0.050	0.050
Augusta Mountains, NV	0.056	0.048	0.055	0.062	0.062	0.052	0.049
Bald Mountain, NV	0.052	0.028	0.044	0.048	0.051	0.045	0.033
Black Rock East, NV (2005)	0.059	0.048	0.060	0.064	0.075	0.073	0.043
Black Rock East, NV (2010)	0.059	0.042	0.051	0.057	0.072	0.068	0.044
Black Rock East, NV (2011)	0.045	0.042	0.044	0.045	0.062	0.058	0.035
Black Rock West, NV (2005)	0.063	0.047	0.054	0.057	0.068	0.065	0.049
Black Rock West, NV (2010)	0.061	0.047	0.056	0.061	0.067	0.064	0.049
Black Rock West, NV (2011)	0.087	0.078	0.072	0.077	0.081	0.080	0.076
Buffalo Hills, NV	0.070	0.066	0.071	0.073	0.075	0.064	0.063
Buffalo Hills, NV (2009)	0.063	0.049	0.056	0.065	0.069	0.054	0.046
Calico, NV	0.047	0.031	0.043	0.050	0.053	0.038	0.040
Calico Mountains, NV	0.066	0.046	0.054	0.060	0.062	0.053	0.043
Calico Mountains, NV (2011)	0.052	0.038	0.052	0.057	0.052	0.041	0.043
Callaghan, NV (Austin Allot)	0.041	0.033	0.040	0.048	0.049	0.046	0.032
Callaghan, NV (East Allot)	0.047	0.029	0.040	0.043	0.048	0.039	0.037
Catnip Herd, NV	0.075	0.055	0.061	0.066	0.069	0.063	0.056
Chimney Creek, NV	0.062	0.048	0.043	0.047	0.060	0.047	0.041
Desatoya Mountain, NV	0.091	0.071	0.083	0.095	0.096	0.096	0.068

Dolly Varden, NV	0.053	0.046	0.046	0.056	0.049	0.045	0.052
Dry Lake, NV	0.052	0.051	0.063	0.067	0.067	0.056	0.044
Fish Creek, NV	0.051	0.043	0.050	0.055	0.066	0.048	0.045
Goshute, NV	0.068	0.060	0.065	0.072	0.072	0.062	0.063
Goshute, NV (2011)	0.064	0.056	0.058	0.064	0.068	0.058	0.056
Granite, NV	0.060	0.031	0.049	0.059	0.063	0.051	0.044
Granite Range, NV	0.059	0.039	0.048	0.061	0.061	0.046	0.050
Granite Range, NV (2011)	0.048	0.031	0.047	0.055	0.052	0.037	0.045
Grass Valley, NV	0.053	0.040	0.044	0.049	0.048	0.044	0.037
Hall Creek, NV	0.042	0.036	0.052	0.056	0.054	0.052	0.033
Jakes Wash, NV	0.080	0.067	0.083	0.094	0.092	0.079	0.071
Johnnie, NV	0.056	0.056	0.066	0.073	0.087	0.073	0.060
Lahanton Reservoir, NV	0.082	0.068	0.066	0.071	0.069	0.070	0.067
Little Fish Lake, NV	0.068	0.051	0.055	0.066	0.062	0.057	0.047
Little Highrock Canyon, NV	0.059	0.051	0.053	0.060	0.046	0.046	0.052
Little Humboldt, NV	0.065	0.046	0.049	0.059	0.056	0.057	0.047
Little Humboldt, NV (2010)	0.061	0.036	0.046	0.052	0.045	0.042	0.040
Little Owyhee, NV (Fairbanks)	0.075	0.061	0.071	0.079	0.084	0.074	0.060
Little Owyhee, NV (Lake Creek)	0.071	0.059	0.047	0.050	0.060	0.051	0.055
Little Owyhee, NV (Twin Valley)	0.058	0.045	0.048	0.053	0.061	0.048	0.058
Marvel Gap, NV (SWC 2010)	0.038	0.039	0.032	0.039	0.037	0.039	0.036
McGee Mountain, NV	0.054	0.033	0.047	0.055	0.059	0.047	0.031
Miller Mountain, NV (SWC 2010)	0.053	0.040	0.045	0.048	0.057	0.048	0.040
Montezuma Peak, NV	0.074	0.064	0.068	0.071	0.057	0.054	0.064
Nellis, NV	0.050	0.033	0.047	0.049	0.057	0.044	0.036
New Pass-Ravenswood, NV	0.044	0.033	0.047	0.048	0.050	0.041	0.038
North Stillwater, NV	0.055	0.049	0.057	0.059	0.068	0.040	0.051
Paymaster, NV (2006)	0.065	0.063	0.067	0.065	0.062	0.058	0.055
Paymaster, NV (2010)	0.067	0.065	0.072	0.070	0.063	0.058	0.057
Pine Nut Mountain, NV	0.068	0.061	0.087	0.095	0.103	0.085	0.058
Powell Mountain, NV	0.060	0.060	0.077	0.082	0.074	0.074	0.065
Red Rock, NV	0.061	0.057	0.064	0.068	0.067	0.059	0.056
Reveille, NV	0.067	0.049	0.059	0.068	0.072	0.064	0.054
Roberts Mountain, NV	0.050	0.049	0.052	0.054	0.060	0.055	0.037
Rock Creek, NV (2002)	0.078	0.063	0.079	0.078	0.078	0.079	0.061
Rock Creek, NV (2010)	0.058	0.047	0.058	0.059	0.059	0.060	0.040
Rocky Hills, NV	0.048	0.040	0.046	0.048	0.047	0.049	0.036

TABLE F-2 Continued

	Black Mountain, ID (2010)	Challis, ID	Hard Trigger, ID	Hard Trigger, ID (2010)	Idaho, ID (BLM)	Sand Basin, ID	Saylor Creek, ID
Rodeo Creek, NV	0.052	0.035	0.048	0.055	0.052	0.044	0.035
Saulsbery, NV	0.054	0.026	0.050	0.057	0.055	0.048	0.034
Sand Springs East, NV	0.052	0.033	0.045	0.052	0.057	0.045	0.031
Seven Mile, NV	0.056	0.043	0.048	0.054	0.051	0.044	0.043
Shawave Mountains, NV	0.057	0.035	0.045	0.051	0.051	0.049	0.036
Silver Peak, NV	0.068	0.053	0.060	0.063	0.068	0.056	0.055
Snowstorm, NV (Castle Ridge)	0.062	0.039	0.052	0.050	0.052	0.047	0.045
Snowstorm, NV (Dryhill)	0.097	0.089	0.081	0.081	0.082	0.069	0.089
South Shoshone, NV	0.034	0.039	0.044	0.049	0.050	0.033	0.042
Spruce-Peupop, NV (2011)	0.070	0.065	0.072	0.079	0.079	0.068	0.070
Stillwater, NV	0.066	0.061	0.060	0.060	0.069	0.045	0.056
Stone Cabin, NV	0.047	0.032	0.043	0.045	0.051	0.041	0.031
Warm Springs, NV	0.061	0.042	0.056	0.058	0.064	0.058	0.048
Warm Springs Canyon, NV	0.056	0.033	0.044	0.049	0.055	0.047	0.036
Wheeler Pass, NV	0.079	0.078	0.080	0.088	0.091	0.084	0.071
Wheeler Pass, NV (2007)	0.037	0.034	0.047	0.054	0.054	0.046	0.036
Alvord Tule, OR	0.059	0.036	0.065	0.068	0.068	0.054	0.052
Beatys Butte, OR	0.047	0.035	0.039	0.044	0.049	0.041	0.035
Beatys Butte, OR (2010)	0.044	0.042	0.036	0.040	0.039	0.037	0.037
Big Summit, OR (2010)	0.133	0.105	0.106	0.113	0.102	0.117	0.105
Cold Spring, OR	0.047	0.039	0.041	0.048	0.054	0.053	0.046
Cold Spring, OR (2010)	0.056	0.046	0.047	0.051	0.053	0.058	0.053
Coyote Lake, OR	0.064	0.043	0.058	0.066	0.076	0.058	0.050
Coyote Lake, OR (2011)	0.049	0.029	0.047	0.053	0.059	0.044	0.036
Fishnet, OR	0.062	0.058	0.065	0.060	0.074	0.052	0.054
Hog Creek, OR	0.052	0.045	0.055	0.058	0.057	0.048	0.055
Jackies Butte, OR	0.051	0.049	0.060	0.059	0.063	0.055	0.047
Jackies Butte, OR (2011)	0.047	0.038	0.051	0.050	0.052	0.039	0.042
Kiger, OR (2011)	0.069	0.048	0.070	0.075	0.075	0.068	0.055
Kiger Herd, OR (2009)	0.069	0.052	0.073	0.080	0.082	0.075	0.061
Liggett Table, OR	0.195	0.170	0.160	0.168	0.168	0.174	0.177
Murderers Creek, OR (2001)	0.107	0.092	0.083	0.093	0.093	0.098	0.097
Murderers Creek, OR (2009)	0.088	0.074	0.073	0.084	0.081	0.082	0.076

Paisley Desert, OR	0.039	0.035	0.038	0.046	0.052	0.041	0.033
Riddle Herd, OR (2009)	0.076	0.051	0.072	0.081	0.082	0.072	0.066
Riddle Mountain, OR	0.068	0.048	0.069	0.074	0.075	0.068	0.060
Riddle Mountain, OR (2011)	0.079	0.058	0.081	0.088	0.089	0.075	0.075
Sand Springs, OR (2011)	0.046	0.038	0.051	0.055	0.056	0.043	0.044
Sheepshead, OR	0.039	0.035	0.043	0.049	0.052	0.045	0.038
Sheepshead, OR (2011)	0.037	0.029	0.043	0.048	0.050	0.046	0.034
South Steens, OR	0.043	0.039	0.043	0.048	0.054	0.038	0.044
South Steens, OR (2010)	0.047	0.041	0.048	0.051	0.055	0.039	0.046
Stinkingwater, OR	0.074	0.074	0.067	0.066	0.091	0.080	0.068
Three Fingers, OR	0.047	0.050	0.048	0.050	0.060	0.058	0.039
Three Fingers, OR (2011)	0.041	0.043	0.041	0.041	0.050	0.047	0.032
Warm Springs, OR	0.037	0.035	0.036	0.035	0.041	0.039	0.029
Warm Springs, OR (2010)	0.040	0.037	0.036	0.035	0.042	0.039	0.030
Blawn Wash, UT	0.071	0.077	0.096	0.089	0.089	0.068	0.079
Cedar Mountain, UT	0.070	0.051	0.062	0.066	0.070	0.048	0.065
Cedar Ridge, UT	0.080	0.052	0.069	0.069	0.076	0.067	0.066
Cedar Ridge, UT (trap)	0.089	0.063	0.081	0.080	0.077	0.072	0.080
Cold Springs, UT (2006)	0.111	0.090	0.104	0.110	0.112	0.100	0.100
Cold Springs, UT (trap)	0.081	0.060	0.088	0.093	0.089	0.073	0.080
Delta, UT	0.048	0.033	0.048	0.056	0.056	0.051	0.039
Hill Creek, UT	0.058	0.051	0.056	0.063	0.059	0.044	0.054
Muddy Creek, UT	0.113	0.082	0.111	0.122	0.121	0.104	0.102
North Hills, UT	0.091	0.076	0.066	0.074	0.077	0.086	0.075
Range Creek, UT	0.061	0.036	0.053	0.055	0.060	0.049	0.048
Simbad, UT	0.089	0.054	0.094	0.097	0.095	0.085	0.063
Sulphur, UT	0.113	0.113	0.104	0.115	0.108	0.111	0.092
Sulphur Herd, UT (South, 2006)	0.088	0.068	0.067	0.082	0.078	0.070	0.070
Tilley Creek, UT	0.078	0.070	0.077	0.078	0.066	0.071	0.080
Winter Ridge, UT	0.051	0.050	0.045	0.054	0.043	0.051	0.049
Adobe Town, WY	0.045	0.046	0.035	0.042	0.046	0.044	0.035
Adobe Town, WY (2011)	0.039	0.040	0.031	0.034	0.033	0.027	0.036
Antelope Hills, WY	0.073	0.039	0.051	0.064	0.071	0.062	0.044
Conant Creek, WY (Lander)	0.073	0.072	0.081	0.085	0.092	0.074	0.075
Cooper Creek, WY	0.051	0.042	0.046	0.056	0.059	0.052	0.034
Dishpan Butte, WY (Lander)	0.063	0.046	0.063	0.070	0.075	0.065	0.048
Divide Basin, WY	0.050	0.027	0.035	0.041	0.044	0.039	0.032

TABLE F-2 Continued

	Black Mountain, ID (2010)	Challis, ID	Hard Trigger, ID	Hard Trigger, ID (2010)	Idaho, ID (BLM)	Sand Basin, ID	Saylor Creek, ID
Divide Basin, WY (2011)	0.049	0.029	0.036	0.039	0.045	0.041	0.027
Eagles Nest, WY	0.080	0.060	0.071	0.074	0.076	0.065	0.063
Happy Creek Springs, WY	0.069	0.060	0.062	0.065	0.073	0.069	0.042
Little Colorado, WY	0.041	0.044	0.044	0.044	0.047	0.053	0.036
Little Colorado, WY (2011)	0.041	0.041	0.043	0.044	0.045	0.050	0.036
Lost Creek, WY	0.053	0.034	0.048	0.053	0.046	0.043	0.039
Lost Creek, WY (combined)	0.055	0.036	0.050	0.055	0.047	0.042	0.038
McCullough Peaks, WY	0.055	0.050	0.055	0.061	0.069	0.058	0.051
Muskat Basin, WY (Lander)	0.065	0.046	0.067	0.070	0.075	0.065	0.047
Salt Wells, WY (East)	0.039	0.033	0.034	0.038	0.035	0.027	0.035
Salt Wells, WY (West)	0.045	0.040	0.044	0.047	0.054	0.052	0.038
Stewart Creek, WY	0.065	0.039	0.062	0.067	0.067	0.054	0.045
Stewart Creek, WY (2009)	0.057	0.043	0.051	0.056	0.053	0.056	0.042
White Mountain, WY (2011)	0.057	0.045	0.053	0.061	0.054	0.051	0.048

	Pryor Mountains, MT (2001)	Pryor Mountains, MT (2009)	Bordo Atravizado, NM	El Rito, NM	Jacarilla, NM	Jarita, NM	Jicarilla, NM
Pryor Mountains, MT (2001)	0.000						
Pryor Mountains, MT (2009)	0.035	0.000					
Bordo Atravizado, NM	0.063	0.045					
El Rito, NM	0.058	0.040	0.000	0.000			
Jacarilla, NM	0.054	0.039	0.056	0.018	0.000		
Jarita, NM	0.084	0.061	0.091	0.027	0.033	0.000	
Jicarilla, NM	0.119	0.090	0.098	0.032	0.060	0.034	0.000
Antelope Valley, NV	0.068	0.042	0.036	0.039	0.043	0.068	0.077
Antelope Valley, NV (2011)	0.073	0.045	0.034	0.036	0.048	0.070	0.073
Augusta Mountains, NV	0.073	0.048	0.044	0.031	0.039	0.057	0.068
Bald Mountain, NV	0.060	0.034	0.026	0.030	0.034	0.058	0.068
Black Rock East, NV (2005)	0.079	0.060	0.052	0.059	0.063	0.089	0.095
Black Rock East, NV (2010)	0.072	0.056	0.052	0.050	0.055	0.074	0.083
Black Rock East, NV (2011)	0.068	0.048	0.045	0.039	0.050	0.066	0.068

Black Rock West, NV (2005)	0.067	0.050	0.054	0.059	0.059	0.059	0.089	0.100
Black Rock West, NV (2010)	0.072	0.056	0.053	0.055	0.062	0.062	0.085	0.092
Black Rock West, NV (2011)	0.088	0.073	0.076	0.068	0.077	0.077	0.097	0.108
Buffalo Hills, NV	0.091	0.057	0.059	0.051	0.059	0.059	0.076	0.078
Buffalo Hills, NV (2009)	0.069	0.039	0.042	0.037	0.039	0.039	0.061	0.071
Calico, NV	0.058	0.032	0.035	0.035	0.037	0.037	0.057	0.068
Calico Mountains, NV	0.075	0.048	0.040	0.051	0.047	0.047	0.080	0.091
Calico Mountains, NV (2011)	0.067	0.039	0.039	0.037	0.041	0.041	0.064	0.070
Callaghan, NV (Austin Allot)	0.062	0.035	0.033	0.030	0.035	0.035	0.049	0.060
Callaghan, NV (East Allot)	0.060	0.036	0.030	0.028	0.035	0.035	0.058	0.071
Catnip Herd, NV	0.077	0.043	0.057	0.054	0.059	0.059	0.082	0.099
Chimney Creek, NV	0.062	0.042	0.051	0.049	0.048	0.048	0.076	0.093
Desatoya Mountain, NV	0.092	0.068	0.073	0.060	0.065	0.065	0.080	0.087
Dolly Varden, NV	0.069	0.040	0.042	0.036	0.048	0.048	0.061	0.067
Dry Lake, NV	0.084	0.056	0.053	0.050	0.047	0.047	0.071	0.078
Fish Creek, NV	0.069	0.042	0.049	0.040	0.041	0.041	0.061	0.071
Goshute, NV	0.081	0.057	0.054	0.048	0.064	0.064	0.079	0.079
Goshute, NV (2011)	0.072	0.045	0.049	0.050	0.065	0.065	0.080	0.090
Granite, NV	0.066	0.041	0.038	0.042	0.041	0.041	0.063	0.078
Granite Range, NV	0.063	0.038	0.043	0.041	0.038	0.038	0.057	0.080
Granite Range, NV (2011)	0.063	0.035	0.039	0.030	0.036	0.036	0.049	0.060
Grass Valley, NV	0.062	0.036	0.032	0.033	0.037	0.037	0.061	0.071
Hall Creek, NV	0.066	0.040	0.036	0.036	0.040	0.040	0.053	0.060
Jakes Wash, NV	0.089	0.063	0.075	0.057	0.066	0.066	0.073	0.104
Johnnie, NV	0.096	0.067	0.067	0.059	0.061	0.061	0.084	0.089
Lahanton Reservoir, NV	0.098	0.074	0.072	0.054	0.075	0.075	0.088	0.084
Little Fish Lake, NV	0.072	0.050	0.043	0.043	0.051	0.051	0.061	0.088
Little Highrock Canyon, NV	0.070	0.050	0.050	0.037	0.044	0.044	0.060	0.066
Little Humboldt, NV	0.088	0.060	0.052	0.059	0.061	0.061	0.077	0.099
Little Humboldt, NV (2010)	0.072	0.050	0.047	0.043	0.045	0.045	0.068	0.084
Little Owyhee, NV (Fairbanks)	0.084	0.051	0.056	0.050	0.056	0.056	0.073	0.085
Little Owyhee, NV (Lake Creek)	0.087	0.053	0.059	0.040	0.042	0.042	0.060	0.077
Little Owyhee, NV (Twin Valley)	0.070	0.044	0.060	0.043	0.035	0.035	0.054	0.080
Marvel Gap, NV (SWC 2010)	0.063	0.039	0.036	0.037	0.042	0.042	0.064	0.079
McGee Mountain, NV	0.053	0.035	0.044	0.044	0.043	0.043	0.069	0.091
Miller Mountain, NV (SWC 2010)	0.065	0.041	0.037	0.037	0.039	0.039	0.065	0.078
Montezuma Peak, NV	0.089	0.067	0.056	0.049	0.061	0.061	0.077	0.089

TABLE F-2 Continued

	Pryor Mountains, MT (2001)	Pryor Mountains, MT (2009)	Bordo Atravissado, NM	El Rito, NM	Jacarilla, NM	Jarita, NM	Jicarilla, NM
Nellis, NV	0.064	0.036	0.034	0.043	0.046	0.072	0.088
New Pass-Ravenswood, NV	0.064	0.038	0.040	0.038	0.042	0.058	0.069
North Stillwater, NV	0.068	0.042	0.053	0.033	0.038	0.056	0.068
Paymaster, NV (2006)	0.087	0.067	0.057	0.053	0.065	0.078	0.091
Paymaster, NV (2010)	0.087	0.067	0.058	0.055	0.064	0.080	0.092
Pine Nut Mountain, NV	0.098	0.072	0.077	0.059	0.062	0.067	0.073
Powell Mountain, NV	0.076	0.066	0.064	0.063	0.071	0.093	0.100
Red Rock, NV	0.080	0.053	0.047	0.044	0.056	0.073	0.083
Reveille, NV	0.080	0.055	0.046	0.058	0.060	0.091	0.109
Roberts Mountain, NV	0.062	0.043	0.043	0.043	0.052	0.076	0.087
Rock Creek, NV (2002)	0.094	0.077	0.081	0.066	0.065	0.090	0.106
Rock Creek, NV (2010)	0.078	0.057	0.060	0.051	0.052	0.073	0.089
Rocky Hills, NV	0.066	0.047	0.043	0.040	0.049	0.072	0.074
Rodeo Creek, NV	0.061	0.040	0.037	0.033	0.034	0.056	0.070
Saulsbery, NV	0.061	0.038	0.039	0.037	0.038	0.055	0.071
Sand Springs East, NV	0.054	0.035	0.043	0.045	0.043	0.070	0.093
Seven Mile, NV	0.071	0.053	0.049	0.041	0.051	0.069	0.077
Shawave Mountains, NV	0.069	0.041	0.041	0.034	0.039	0.052	0.059
Silver Peak, NV	0.084	0.053	0.063	0.051	0.050	0.060	0.083
Snowstorm, NV (Castle Ridge)	0.084	0.058	0.052	0.049	0.053	0.081	0.094
Snowstorm, NV (Dryhill)	0.102	0.075	0.089	0.075	0.077	0.082	0.113
South Shoshone, NV	0.063	0.038	0.040	0.031	0.039	0.059	0.068
Spruce-Pequop, NV (2011)	0.092	0.059	0.052	0.056	0.068	0.081	0.087
Stillwater, NV	0.073	0.050	0.058	0.037	0.048	0.059	0.076
Stone Cabin, NV	0.059	0.034	0.034	0.034	0.035	0.065	0.077
Warm Springs, NV	0.063	0.042	0.055	0.052	0.050	0.072	0.093
Warm Springs Canyon, NV	0.055	0.033	0.039	0.041	0.039	0.063	0.084
Wheeler Pass, NV	0.109	0.081	0.078	0.073	0.081	0.106	0.108
Wheeler Pass, NV (2007)	0.075	0.047	0.036	0.037	0.045	0.066	0.067
Alvord Tule, OR	0.066	0.042	0.050	0.051	0.044	0.073	0.100
Beatys Butte, OR	0.060	0.035	0.038	0.032	0.037	0.057	0.064
Beatys Butte, OR (2010)	0.062	0.036	0.034	0.031	0.033	0.058	0.063
Big Summit, OR (2010)	0.152	0.123	0.100	0.115	0.127	0.145	0.157

Cold Spring, OR	0.072	0.045	0.039	0.042	0.046	0.056	0.081
Cold Spring, OR (2010)	0.077	0.057	0.039	0.045	0.052	0.064	0.084
Coyote Lake, OR	0.074	0.047	0.046	0.053	0.044	0.083	0.106
Coyote Lake, OR (2011)	0.058	0.035	0.037	0.043	0.038	0.069	0.092
Fishnet, OR	0.078	0.047	0.064	0.052	0.056	0.081	0.094
Hog Creek, OR	0.078	0.051	0.048	0.045	0.044	0.063	0.083
Jackies Butte, OR	0.064	0.041	0.050	0.054	0.056	0.076	0.090
Jackies Butte, OR (2011)	0.058	0.033	0.046	0.046	0.046	0.070	0.082
Kiger, OR (2011)	0.078	0.048	0.062	0.053	0.048	0.065	0.079
Kiger Herd, OR (2009)	0.080	0.051	0.067	0.063	0.056	0.076	0.092
Liggett Table, OR	0.162	0.161	0.183	0.172	0.166	0.190	0.224
Murderers Creek, OR (2001)	0.111	0.080	0.093	0.075	0.087	0.099	0.118
Murderers Creek, OR (2009)	0.082	0.056	0.078	0.061	0.071	0.080	0.102
Paisley Desert, OR	0.056	0.031	0.034	0.030	0.032	0.059	0.074
Riddle Herd, OR (2009)	0.083	0.056	0.077	0.062	0.057	0.072	0.090
Riddle Mountain, OR	0.083	0.052	0.072	0.061	0.056	0.073	0.088
Riddle Mountain, OR (2011)	0.091	0.063	0.086	0.067	0.059	0.076	0.096
Sand Springs, OR (2011)	0.076	0.044	0.044	0.043	0.041	0.068	0.083
Sheepshead, OR	0.064	0.040	0.040	0.036	0.038	0.063	0.074
Sheepshead, OR (2011)	0.065	0.043	0.036	0.035	0.038	0.060	0.073
South Steens, OR	0.059	0.038	0.042	0.030	0.024	0.049	0.072
South Steens, OR (2010)	0.060	0.039	0.045	0.030	0.029	0.048	0.066
Stinkingwater, OR	0.094	0.057	0.079	0.073	0.073	0.103	0.125
Three Fingers, OR	0.081	0.052	0.050	0.060	0.068	0.087	0.098
Three Fingers, OR (2011)	0.066	0.044	0.049	0.050	0.059	0.075	0.091
Warm Springs, OR	0.052	0.029	0.044	0.033	0.036	0.048	0.070
Warm Springs, OR (2010)	0.055	0.031	0.043	0.034	0.038	0.049	0.070
Blawn Wash, UT	0.095	0.081	0.083	0.081	0.082	0.116	0.120
Cedar Mountain, UT	0.082	0.051	0.059	0.052	0.051	0.069	0.086
Cedar Ridge, UT	0.108	0.071	0.066	0.085	0.077	0.109	0.127
Cedar Ridge, UT (trap)	0.119	0.081	0.073	0.085	0.087	0.112	0.125
Cold Springs, UT (2006)	0.113	0.088	0.107	0.115	0.107	0.131	0.157
Cold Springs, UT (trap)	0.082	0.067	0.080	0.088	0.080	0.107	0.136
Delta, UT	0.068	0.042	0.039	0.033	0.037	0.051	0.068
Hill Creek, UT	0.078	0.055	0.051	0.037	0.041	0.070	0.067
Muddy Creek, UT	0.132	0.086	0.075	0.091	0.102	0.119	0.144
North Hills, UT	0.106	0.071	0.079	0.078	0.070	0.093	0.122

continued

TABLE F-2 Continued

	Pryor Mountains, MT (2001)	Pryor Mountains, MT (2009)	Bordo Atravissado, NM	El Rito, NM	Jacarilla, NM	Jarita, NM	Jicarilla, NM
Range Creek, UT	0.076	0.046	0.052	0.066	0.058	0.086	0.106
Sinbad, UT	0.087	0.075	0.068	0.070	0.070	0.086	0.094
Sulphur, UT	0.134	0.105	0.096	0.088	0.091	0.120	0.132
Sulphur Herd, UT (South, 2006)	0.090	0.063	0.078	0.057	0.053	0.068	0.091
Tilley Creek, UT	0.116	0.095	0.086	0.072	0.076	0.095	0.105
Winter Ridge, UT	0.080	0.057	0.046	0.035	0.046	0.062	0.058
Adobe Town, WY	0.063	0.040	0.033	0.030	0.038	0.059	0.072
Adobe Town, WY (2011)	0.058	0.031	0.028	0.027	0.036	0.054	0.063
Antelope Hills, WY	0.063	0.036	0.052	0.050	0.050	0.073	0.088
Conant Creek, WY (Lander)	0.094	0.067	0.073	0.066	0.075	0.093	0.107
Cooper Creek, WY	0.066	0.042	0.045	0.032	0.032	0.056	0.070
Dishpan Butte, WY (Lander)	0.088	0.058	0.056	0.056	0.052	0.075	0.102
Divide Basin, WY	0.061	0.031	0.035	0.029	0.029	0.047	0.063
Divide Basin, WY (2011)	0.064	0.034	0.030	0.031	0.033	0.052	0.066
Eagles Nest, WY	0.089	0.057	0.067	0.064	0.070	0.088	0.107
Happy Creek Springs, WY	0.082	0.055	0.057	0.064	0.059	0.096	0.107
Little Colorado, WY	0.077	0.047	0.042	0.056	0.058	0.085	0.098
Little Colorado, WY (2011)	0.072	0.043	0.046	0.049	0.050	0.072	0.088
Lost Creek, WY	0.052	0.030	0.039	0.039	0.042	0.057	0.076
Lost Creek, WY (combined)	0.053	0.034	0.041	0.035	0.039	0.051	0.074
McCullough Peaks, WY	0.077	0.046	0.062	0.054	0.044	0.082	0.096
Muskrat Basin, WY (Lander)	0.087	0.060	0.053	0.062	0.066	0.087	0.111
Salt Wells, WY (East)	0.051	0.027	0.027	0.027	0.032	0.055	0.072
Salt Wells, WY (West)	0.079	0.054	0.034	0.042	0.052	0.072	0.071
Stewart Creek, WY	0.059	0.038	0.052	0.053	0.049	0.069	0.092
Stewart Creek, WY (2009)	0.069	0.044	0.044	0.049	0.044	0.069	0.089
White Mountain, WY (2011)	0.076	0.057	0.047	0.039	0.046	0.066	0.071
Antelope Valley, NV	0.000	Antelope Valley, NV (2011)	Augusta Mountains, NV	Bald Mountain, NV	Black Rock East, NV (2005)	Black Rock East, NV (2010)	Black Rock East, NV (2011)
Antelope Valley, NV	0.009	0.000					

TABLE F-2 Continued

	Antelope Valley, NV	Antelope Valley, NV (2011)	Augusta Mountains, NV	Bald Mountain, NV	Black Rock East, NV (2005)	Black Rock East, NV (2010)	Black Rock East, NV (2011)
Little Owyhee, NV (Twin Valley)	0.043	0.053	0.048	0.038	0.061	0.049	0.048
Marvel Gap, NV (SWC 2010)	0.033	0.031	0.034	0.032	0.052	0.047	0.044
McGee Mountain, NV	0.037	0.038	0.038	0.028	0.043	0.040	0.038
Miller Mountain, NV (SWC 2010)	0.043	0.045	0.035	0.023	0.052	0.045	0.036
Montezuma Peak, NV	0.053	0.053	0.061	0.051	0.081	0.079	0.075
Nellis, NV	0.036	0.034	0.030	0.025	0.038	0.037	0.031
New Pass-Ravenswood, NV	0.031	0.035	0.027	0.022	0.038	0.035	0.028
North Stillwater, NV	0.039	0.046	0.037	0.035	0.056	0.053	0.048
Paymaster, NV (2006)	0.058	0.060	0.069	0.050	0.076	0.075	0.069
Paymaster, NV (2010)	0.057	0.059	0.070	0.054	0.076	0.078	0.071
Pine Nut Mountain, NV	0.069	0.069	0.055	0.053	0.074	0.073	0.062
Powell Mountain, NV	0.049	0.056	0.060	0.062	0.074	0.067	0.051
Red Rock, NV	0.041	0.035	0.045	0.037	0.055	0.049	0.043
Reveille, NV	0.050	0.051	0.041	0.036	0.052	0.051	0.044
Roberts Mountain, NV	0.046	0.040	0.038	0.032	0.048	0.042	0.036
Rock Creek, NV (2002)	0.069	0.068	0.070	0.054	0.085	0.074	0.069
Rock Creek, NV (2010)	0.047	0.047	0.049	0.037	0.065	0.056	0.048
Rocky Hills, NV	0.044	0.039	0.044	0.031	0.051	0.042	0.031
Rodeo Creek, NV	0.023	0.024	0.034	0.019	0.051	0.046	0.039
Saulsbury, NV	0.036	0.039	0.035	0.020	0.049	0.044	0.035
Sand Springs East, NV	0.034	0.036	0.037	0.028	0.043	0.040	0.038
Seven Mile, NV	0.044	0.040	0.047	0.036	0.071	0.060	0.051
Shawave Mountains, NV	0.032	0.035	0.043	0.027	0.057	0.052	0.043
Silver Peak, NV	0.054	0.062	0.047	0.037	0.060	0.055	0.054
Snowstorm, NV (Castle Ridge)	0.044	0.049	0.051	0.030	0.066	0.062	0.056
Snowstorm, NV (Dryhill)	0.079	0.088	0.076	0.073	0.088	0.085	0.084
South Shoshone, NV	0.032	0.031	0.030	0.028	0.053	0.050	0.041
Spruce-Pequop, NV (2011)	0.031	0.032	0.040	0.042	0.063	0.058	0.050
Stillwater, NV	0.049	0.053	0.039	0.042	0.064	0.061	0.057
Stone Cabin, NV	0.031	0.033	0.031	0.017	0.044	0.040	0.034
Warm Springs, NV	0.050	0.052	0.050	0.031	0.032	0.034	0.041
Warm Springs Canyon, NV	0.038	0.040	0.035	0.023	0.030	0.027	0.032
Wheeler Pass, NV	0.059	0.056	0.065	0.052	0.068	0.058	0.048
Wheeler Pass, NV (2007)	0.028	0.027	0.031	0.022	0.038	0.036	0.028

Alvord Tule, OR	0.040	0.045	0.039	0.033	0.062	0.056	0.051
Beatys Butte, OR	0.027	0.028	0.031	0.020	0.040	0.034	0.030
Beatys Butte, OR (2010)	0.032	0.035	0.037	0.023	0.047	0.047	0.040
Big Summit, OR (2010)	0.104	0.096	0.121	0.095	0.138	0.131	0.120
Cold Springs, OR	0.039	0.040	0.032	0.031	0.054	0.045	0.038
Cold Springs, OR (2010)	0.047	0.047	0.040	0.038	0.062	0.055	0.045
Coyote Lake, OR	0.044	0.049	0.033	0.032	0.064	0.057	0.051
Coyote Lake, OR (2011)	0.031	0.039	0.029	0.027	0.048	0.045	0.038
Fishnet, OR	0.055	0.059	0.046	0.038	0.063	0.058	0.049
Hog Creek, OR	0.044	0.043	0.039	0.036	0.061	0.054	0.042
Jackies Butte, OR	0.051	0.052	0.055	0.046	0.058	0.048	0.034
Jackies Butte, OR (2011)	0.042	0.045	0.050	0.037	0.049	0.040	0.032
Kiger, OR (2011)	0.051	0.052	0.058	0.036	0.062	0.060	0.056
Kiger Herd, OR (2009)	0.058	0.057	0.061	0.041	0.063	0.061	0.056
Liggett Table, OR	0.193	0.193	0.175	0.157	0.176	0.152	0.169
Murderers Creek, OR (2001)	0.089	0.081	0.079	0.069	0.111	0.096	0.085
Murderers Creek, OR (2009)	0.073	0.069	0.070	0.058	0.097	0.084	0.070
Paisley Desert, OR	0.025	0.027	0.028	0.019	0.041	0.035	0.029
Riddle Herd, OR (2009)	0.064	0.069	0.076	0.045	0.065	0.063	0.066
Riddle Mountain, OR	0.059	0.065	0.070	0.042	0.061	0.061	0.061
Riddle Mountain, OR (2011)	0.070	0.076	0.078	0.047	0.077	0.074	0.075
Sand Springs, OR (2011)	0.034	0.043	0.037	0.032	0.054	0.055	0.046
Sheepshead, OR	0.032	0.034	0.033	0.027	0.051	0.046	0.036
Sheepshead, OR (2011)	0.033	0.034	0.032	0.023	0.044	0.043	0.035
South Steens, OR	0.029	0.033	0.031	0.028	0.050	0.041	0.037
South Steens, OR (2010)	0.031	0.035	0.036	0.031	0.052	0.043	0.035
Stinkingwater, OR	0.076	0.070	0.054	0.058	0.067	0.059	0.053
Three Fingers, OR	0.056	0.057	0.055	0.040	0.055	0.053	0.049
Three Fingers, OR (2011)	0.049	0.051	0.043	0.037	0.051	0.045	0.038
Warm Springs, OR	0.035	0.038	0.034	0.026	0.047	0.039	0.029
Warm Springs, OR (2010)	0.036	0.041	0.032	0.025	0.045	0.035	0.026
Blawn Wash, UT	0.066	0.076	0.075	0.057	0.076	0.070	0.064
Cedar Mountain, UT	0.042	0.052	0.040	0.033	0.069	0.061	0.055
Cedar Ridge, UT	0.070	0.081	0.081	0.056	0.104	0.097	0.084
Cedar Ridge, UT (trap)	0.069	0.080	0.088	0.062	0.117	0.112	0.095
Cold Springs, UT (2006)	0.101	0.108	0.103	0.087	0.107	0.103	0.114
Cold Springs, UT (trap)	0.064	0.072	0.074	0.062	0.080	0.077	0.081

TABLE F-2 Continued

	Antelope Valley, NV	Antelope Valley, NV (2011)	Antelope Valley, NV (2011)	Augusta Mountains, NV	Bald Mountain, NV	Black Rock East, NV (2005)	Black Rock East, NV (2010)	Black Rock East, NV (2011)
Delta, UT	0.028	0.025	0.031	0.023	0.054	0.048	0.039	0.039
Hill Creek, UT	0.040	0.041	0.046	0.030	0.062	0.056	0.053	0.053
Muddy Creek, UT	0.080	0.074	0.084	0.069	0.110	0.101	0.095	0.095
North Hills, UT	0.063	0.062	0.067	0.058	0.095	0.083	0.073	0.073
Range Creek, UT	0.052	0.061	0.058	0.038	0.071	0.066	0.065	0.065
Simbad, UT	0.073	0.077	0.071	0.063	0.079	0.082	0.073	0.073
Sulphur, UT	0.094	0.092	0.083	0.086	0.117	0.116	0.097	0.097
Sulphur Herd, UT (South, 2006)	0.066	0.068	0.059	0.058	0.084	0.071	0.069	0.069
Tilley Creek, UT	0.065	0.076	0.082	0.067	0.095	0.084	0.084	0.084
Winter Ridge, UT	0.038	0.034	0.046	0.035	0.060	0.056	0.047	0.047
Adobe Town, WY	0.034	0.032	0.035	0.031	0.059	0.051	0.040	0.040
Adobe Town, WY (2011)	0.027	0.026	0.036	0.027	0.051	0.046	0.039	0.039
Antelope Hills, WY	0.052	0.052	0.051	0.040	0.055	0.050	0.046	0.046
Conant Creek, WY (Lander)	0.069	0.072	0.076	0.054	0.074	0.076	0.073	0.073
Cooper Creek, WY	0.040	0.039	0.035	0.029	0.049	0.045	0.034	0.034
Dishpan Butte, WY (Lander)	0.055	0.057	0.053	0.039	0.063	0.061	0.057	0.057
Divide Basin, WY	0.025	0.029	0.030	0.017	0.045	0.040	0.037	0.037
Divide Basin, WY (2011)	0.025	0.028	0.029	0.016	0.045	0.042	0.036	0.036
Eagles Nest, WY	0.062	0.059	0.055	0.053	0.085	0.078	0.068	0.068
Happy Creek Springs, WY	0.072	0.070	0.060	0.048	0.068	0.064	0.052	0.052
Little Colorado, WY	0.041	0.043	0.044	0.029	0.050	0.046	0.040	0.040
Little Colorado, WY (2011)	0.040	0.041	0.042	0.028	0.047	0.042	0.037	0.037
Lost Creek, WY	0.037	0.035	0.033	0.025	0.050	0.047	0.040	0.040
Lost Creek, WY (combined)	0.040	0.040	0.039	0.029	0.054	0.051	0.042	0.042
McCullough Peaks, WY	0.055	0.058	0.051	0.036	0.051	0.054	0.049	0.049
Muskrat Basin, WY (Lander)	0.050	0.053	0.046	0.036	0.062	0.061	0.057	0.057
Salt Wells, WY (East)	0.026	0.026	0.030	0.021	0.050	0.043	0.036	0.036
Salt Wells, WY (West)	0.037	0.039	0.035	0.022	0.043	0.043	0.030	0.030
Stewart Creek, WY	0.050	0.052	0.043	0.035	0.064	0.057	0.050	0.050
Stewart Creek, WY (2009)	0.049	0.050	0.048	0.039	0.060	0.062	0.053	0.053
White Mountain, WY (2011)	0.045	0.044	0.050	0.041	0.056	0.053	0.047	0.047

	Black Rock West, NV (2005)	Black Rock West, NV (2010)	Black Rock West, NV (2011)	Buffalo Hills, NV	Buffalo Hills, NV (2009)	Calico, NV	Calico Mountains, NV
Black Rock West, NV (2005)	0.000						
Black Rock West, NV (2010)	0.007						
Black Rock West, NV (2011)	0.025	0.000					
Buffalo Hills, NV	0.074	0.067	0.100	0.000			
Buffalo Hills, NV (2009)	0.063	0.059	0.088	0.017	0.000		
Calico, NV	0.039	0.037	0.060	0.035	0.023	0.000	
Calico Mountains, NV	0.065	0.061	0.084	0.050	0.030	0.021	0.000
Calico Mountains, NV (2011)	0.049	0.044	0.062	0.039	0.028	0.009	0.015
Callaghan, NV (Austin Allot)	0.050	0.049	0.068	0.044	0.030	0.026	0.035
Callaghan, NV (East Allot)	0.043	0.043	0.059	0.047	0.034	0.029	0.039
Catnip Herd, NV	0.044	0.052	0.067	0.065	0.052	0.040	0.048
Chimney Creek, NV	0.035	0.039	0.056	0.059	0.042	0.029	0.048
Chimney Creek, NV	0.074	0.075	0.102	0.084	0.073	0.066	0.086
Desatoya Mountain, NV	0.049	0.047	0.058	0.051	0.041	0.033	0.052
Dolly Varden, NV	0.062	0.059	0.088	0.053	0.039	0.031	0.046
Dry Lake, NV	0.061	0.060	0.080	0.059	0.045	0.028	0.044
Fish Creek, NV	0.056	0.052	0.069	0.061	0.055	0.040	0.069
Goshute, NV	0.052	0.051	0.063	0.064	0.056	0.039	0.064
Goshute, NV (2011)	0.045	0.044	0.068	0.048	0.032	0.013	0.028
Granite, NV	0.051	0.050	0.071	0.043	0.027	0.014	0.028
Granite Range, NV	0.045	0.040	0.063	0.035	0.027	0.009	0.030
Granite Range, NV (2011)	0.053	0.055	0.071	0.049	0.034	0.035	0.039
Grass Valley, NV	0.054	0.052	0.074	0.050	0.034	0.033	0.044
Hall Creek, NV	0.088	0.080	0.107	0.081	0.075	0.060	0.072
Jakes Wash, NV	0.058	0.057	0.086	0.074	0.060	0.053	0.068
Johnnie, NV	0.067	0.062	0.079	0.079	0.073	0.057	0.081
Lahanton Reservoir, NV	0.073	0.072	0.088	0.073	0.049	0.047	0.057
Little Fish Lake, NV	0.061	0.057	0.071	0.050	0.040	0.023	0.042
Little Highrock Canyon, NV	0.078	0.077	0.101	0.071	0.062	0.057	0.058
Little Humboldt, NV	0.061	0.058	0.078	0.065	0.051	0.038	0.042
Little Humboldt, NV (2010)	0.069	0.068	0.084	0.060	0.042	0.043	0.052
Little Owyhee, NV (Fairbanks)	0.065	0.067	0.081	0.060	0.045	0.047	0.056
Little Owyhee, NV (Lake Creek)	0.051	0.053	0.065	0.065	0.053	0.036	0.059
Little Owyhee, NV (Twin Valley)	0.048	0.049	0.074	0.048	0.040	0.038	0.051
Marvel Gap, NV (SWC 2010)							

continued

TABLE F-2 Continued

	Black Rock West, NV (2005)	Black Rock West, NV (2010)	Black Rock West, NV (2011)	Buffalo Hills, NV	Buffalo Hills, NV (2009)	Calico, NV	Calico Mountains, NV
McGee Mountain, NV	0.040	0.043	0.061	0.062	0.042	0.031	0.045
Miller Mountain, NV (SWC 2010)	0.049	0.051	0.066	0.057	0.037	0.034	0.041
Montezuma Peak, NV	0.078	0.071	0.078	0.061	0.055	0.050	0.065
Nellis, NV	0.041	0.040	0.067	0.042	0.033	0.026	0.041
New Pass-Ravenswood, NV	0.037	0.035	0.061	0.049	0.039	0.021	0.041
North Stillwater, NV	0.059	0.056	0.077	0.048	0.033	0.030	0.045
Paymaster, NV (2006)	0.081	0.073	0.088	0.059	0.055	0.054	0.066
Paymaster, NV (2010)	0.082	0.071	0.087	0.052	0.050	0.050	0.061
Pine Nut Mountain, NV	0.085	0.079	0.111	0.074	0.063	0.050	0.069
Powell Mountain, NV	0.080	0.082	0.105	0.091	0.067	0.063	0.080
Red Rock, NV	0.054	0.051	0.068	0.056	0.048	0.045	0.065
Reveille, NV	0.058	0.057	0.085	0.067	0.055	0.046	0.062
Roberts Mountain, NV	0.048	0.047	0.068	0.056	0.047	0.037	0.049
Rock Creek, NV (2002)	0.077	0.078	0.093	0.105	0.087	0.065	0.076
Rock Creek, NV (2010)	0.061	0.060	0.078	0.083	0.066	0.051	0.061
Rocky Hills, NV	0.048	0.045	0.074	0.058	0.047	0.037	0.051
Rodeo Creek, NV	0.050	0.048	0.060	0.043	0.026	0.029	0.037
Saulsbery, NV	0.048	0.047	0.069	0.059	0.037	0.030	0.044
Sand Springs East, NV	0.042	0.045	0.063	0.059	0.041	0.032	0.045
Seven Mile, NV	0.062	0.065	0.086	0.064	0.051	0.042	0.055
Shawave Mountains, NV	0.055	0.055	0.068	0.044	0.028	0.030	0.039
Silver Peak, NV	0.060	0.056	0.078	0.049	0.047	0.037	0.049
Snowstorm, NV (Castle Ridge)	0.066	0.066	0.087	0.069	0.066	0.044	0.060
Snowstorm, NV (Dryhill)	0.085	0.083	0.100	0.065	0.079	0.057	0.086
South Shoshone, NV	0.049	0.047	0.070	0.054	0.045	0.029	0.047
Spruce-Pequeop, NV (2011)	0.066	0.059	0.079	0.072	0.059	0.047	0.064
Stillwater, NV	0.066	0.061	0.071	0.058	0.045	0.042	0.054
Stone Cabin, NV	0.045	0.047	0.067	0.047	0.034	0.030	0.042
Warm Springs, NV	0.019	0.023	0.028	0.059	0.051	0.032	0.057
Warm Springs Canyon, NV	0.017	0.019	0.029	0.054	0.040	0.023	0.037
Wheeler Pass, NV	0.071	0.067	0.091	0.088	0.074	0.073	0.083
Wheeler Pass, NV (2007)	0.045	0.044	0.072	0.056	0.038	0.033	0.044
Alvord Tule, OR	0.053	0.057	0.081	0.066	0.048	0.037	0.050
Beatsys Butte, OR	0.039	0.038	0.059	0.044	0.031	0.024	0.038

Beatsy Butte, OR (2010)	0.045	0.056	0.045	0.035	0.025	0.039
Big Summit, OR (2010)	0.147	0.171	0.131	0.113	0.115	0.100
Cold Spring, OR	0.052	0.071	0.056	0.043	0.032	0.044
Cold Spring, OR (2010)	0.063	0.079	0.057	0.047	0.041	0.050
Coyote Lake, OR	0.060	0.091	0.071	0.048	0.040	0.045
Coyote Lake, OR (2011)	0.050	0.080	0.055	0.037	0.028	0.037
Fishnet, OR	0.057	0.078	0.056	0.053	0.035	0.052
Hog Creek, OR	0.059	0.056	0.055	0.047	0.032	0.050
Jackies Butte, OR	0.049	0.075	0.065	0.054	0.043	0.061
Jackies Butte, OR (2011)	0.036	0.056	0.052	0.044	0.031	0.047
Kiger, OR (2011)	0.063	0.085	0.047	0.040	0.038	0.054
Kiger Herd, OR (2009)	0.062	0.088	0.049	0.044	0.042	0.056
Liggett Table, OR	0.134	0.138	0.209	0.198	0.163	0.179
Murderers Creek, OR (2001)	0.101	0.104	0.097	0.082	0.079	0.074
Murderers Creek, OR (2009)	0.089	0.101	0.074	0.060	0.059	0.060
Paisley Desert, OR	0.045	0.069	0.035	0.028	0.023	0.033
Riddle Herd, OR (2009)	0.062	0.078	0.071	0.059	0.048	0.069
Riddle Mountain, OR	0.059	0.078	0.077	0.065	0.050	0.069
Riddle Mountain, OR (2011)	0.075	0.091	0.081	0.070	0.056	0.076
Sand Springs, OR (2011)	0.059	0.087	0.047	0.039	0.029	0.037
Sheepshead, OR	0.053	0.078	0.053	0.039	0.032	0.038
Sheepshead, OR (2011)	0.052	0.078	0.050	0.039	0.031	0.043
South Steens, OR	0.046	0.066	0.046	0.037	0.029	0.042
South Steens, OR (2010)	0.047	0.059	0.044	0.035	0.026	0.041
Stinkingwater, OR	0.051	0.081	0.101	0.084	0.063	0.083
Three Fingers, OR	0.058	0.086	0.064	0.055	0.047	0.057
Three Fingers, OR (2011)	0.051	0.076	0.064	0.057	0.046	0.058
Warm Springs, OR	0.040	0.058	0.055	0.044	0.028	0.040
Warm Springs, OR (2010)	0.039	0.055	0.053	0.044	0.026	0.040
Blawn Wash, UT	0.068	0.082	0.101	0.086	0.056	0.084
Cedar Mountain, UT	0.063	0.088	0.064	0.051	0.038	0.054
Cedar Ridge, UT	0.100	0.127	0.096	0.080	0.067	0.063
Cedar Ridge, UT (trap)	0.115	0.135	0.092	0.079	0.074	0.070
Cold Springs, UT (2006)	0.084	0.114	0.115	0.097	0.070	0.097
Cold Springs, UT (trap)	0.068	0.093	0.090	0.073	0.053	0.072
Delta, UT	0.060	0.079	0.047	0.028	0.029	0.037
Hill Creek, UT	0.064	0.081	0.041	0.034	0.042	0.049

TABLE F-2 Continued

	Black Rock West, NV (2005)	Black Rock West, NV (2010)	Black Rock West, NV (2011)	Buffalo Hills, NV	Buffalo Hills, NV (2009)	Calico, NV	Calico Mountains, NV
Muddy Creek, UT	0.104	0.104	0.135	0.108	0.095	0.080	0.103
North Hills, UT	0.095	0.098	0.122	0.086	0.073	0.076	0.074
Range Creek, UT	0.060	0.063	0.088	0.070	0.055	0.036	0.045
Sinbad, UT	0.093	0.089	0.115	0.092	0.070	0.062	0.065
Sulphur, UT	0.129	0.127	0.145	0.108	0.087	0.094	0.092
Sulphur Herd, UT (South, 2006)	0.082	0.084	0.101	0.072	0.057	0.058	0.060
Tilley Creek, UT	0.096	0.090	0.117	0.092	0.086	0.066	0.089
Winter Ridge, UT	0.060	0.055	0.072	0.046	0.037	0.037	0.047
Adobe Town, WY	0.059	0.059	0.073	0.055	0.039	0.042	0.050
Adobe Town, WY (2011)	0.048	0.047	0.062	0.037	0.032	0.027	0.043
Antelope Hills, WY	0.053	0.057	0.087	0.063	0.046	0.032	0.047
Conant Creek, WY (Lander)	0.081	0.080	0.092	0.081	0.067	0.055	0.070
Cooper Creek, WY	0.057	0.054	0.074	0.049	0.035	0.034	0.041
Dishpan Butte, WY (Lander)	0.068	0.069	0.086	0.073	0.057	0.054	0.059
Divide Basin, WY	0.042	0.043	0.065	0.046	0.032	0.022	0.035
Divide Basin, WY (2011)	0.046	0.047	0.071	0.049	0.031	0.026	0.036
Eagles Nest, WY	0.080	0.077	0.103	0.079	0.073	0.061	0.070
Happy Creek Springs, WY	0.069	0.068	0.103	0.071	0.055	0.047	0.041
Little Colorado, WY	0.046	0.044	0.067	0.063	0.052	0.039	0.045
Little Colorado, WY (2011)	0.042	0.039	0.062	0.058	0.049	0.032	0.043
Lost Creek, WY	0.048	0.047	0.072	0.051	0.037	0.031	0.043
Lost Creek, WY (combined)	0.054	0.051	0.073	0.054	0.040	0.033	0.042
McCullough Peaks, WY	0.054	0.058	0.080	0.061	0.053	0.038	0.053
Muskat Basin, WY (Lander)	0.068	0.065	0.087	0.073	0.060	0.053	0.060
Salt Wells, WY (East)	0.045	0.045	0.059	0.045	0.030	0.026	0.038
Salt Wells, WY (West)	0.051	0.047	0.074	0.052	0.042	0.032	0.043
Stewart Creek, WY	0.059	0.061	0.085	0.066	0.050	0.037	0.047
Stewart Creek, WY (2009)	0.061	0.061	0.084	0.066	0.049	0.043	0.051
White Mountain, WY (2011)	0.053	0.048	0.060	0.058	0.043	0.028	0.049

	Calico Mountains, NV (2011)	Callaghan, NV (Austin Allot)	Callaghan, NV (East Allot)	Catnip Herd, NV	Chimney Creek, NV	Desatoya Mountain, NV	Dolly Varden, NV
Calico Mountains, NV (2011)	0.000						
Callaghan, NV (Austin Allot)	0.031	0.000					
Callaghan, NV (East Allot)	0.035	0.014	0.000				
Catnip Herd, NV	0.046	0.044	0.042	0.000			
Chimney Creek, NV	0.042	0.037	0.037	0.043	0.000		
Desatoya Mountain, NV	0.081	0.054	0.061	0.076	0.068	0.000	
Dolly Varden, NV	0.037	0.037	0.031	0.047	0.050	0.077	0.000
Dry Lake, NV	0.040	0.027	0.040	0.058	0.040	0.058	0.055
Fish Creek, NV	0.037	0.024	0.033	0.058	0.047	0.063	0.044
Goshute, NV	0.051	0.048	0.044	0.059	0.053	0.070	0.028
Goshute, NV (2011)	0.049	0.043	0.038	0.055	0.050	0.069	0.028
Granite, NV	0.018	0.027	0.030	0.053	0.041	0.074	0.037
Granite Range, NV	0.025	0.030	0.030	0.050	0.039	0.075	0.038
Granite Range, NV (2011)	0.014	0.023	0.027	0.045	0.038	0.071	0.029
Grass Valley, NV	0.042	0.013	0.012	0.042	0.041	0.054	0.033
Hall Creek, NV	0.038	0.007	0.020	0.049	0.045	0.059	0.039
Jakes Wash, NV	0.065	0.047	0.055	0.070	0.081	0.080	0.071
Johnnie, NV	0.060	0.046	0.047	0.073	0.063	0.068	0.054
Lahanton Reservoir, NV	0.063	0.051	0.050	0.061	0.063	0.077	0.063
Little Fish Lake, NV	0.057	0.033	0.033	0.056	0.053	0.074	0.055
Little Highrock Canyon, NV	0.025	0.043	0.044	0.064	0.052	0.091	0.038
Little Humboldt, NV	0.063	0.045	0.042	0.066	0.068	0.088	0.047
Little Humboldt, NV (2010)	0.042	0.034	0.030	0.055	0.054	0.080	0.040
Little Owyhee, NV (Fairbanks)	0.044	0.029	0.040	0.072	0.055	0.083	0.049
Little Owyhee, NV (Lake Creek)	0.054	0.036	0.038	0.061	0.042	0.085	0.053
Little Owyhee, NV (Twin Valley)	0.045	0.036	0.036	0.065	0.045	0.069	0.042
Marvel Gap, NV (SWC 2010)	0.044	0.029	0.028	0.036	0.047	0.068	0.036
McGee Mountain, NV	0.041	0.030	0.030	0.044	0.034	0.058	0.046
Miller Mountain, NV (SWC 2010)	0.036	0.017	0.022	0.050	0.041	0.065	0.047
Montezuma Peak, NV	0.053	0.049	0.045	0.067	0.070	0.100	0.047
Nellis, NV	0.036	0.021	0.019	0.043	0.034	0.055	0.044
New Pass-Ravenswood, NV	0.033	0.020	0.024	0.040	0.034	0.048	0.037
North Stillwater, NV	0.034	0.033	0.033	0.058	0.050	0.082	0.048
Paymaster, NV (2006)	0.055	0.044	0.048	0.074	0.071	0.097	0.055

continued

TABLE F-2 Continued

	Calico Mountains, NV (2011)	Callaghan, NV (Austin Allot)	Callaghan, NV (East Allot)	Catnip Herd, NV	Chimney Creek, NV	Desatoya Mountain, NV	Dolly Varden, NV
Paymaster, NV (2010)	0.051	0.045	0.050	0.070	0.070	0.097	0.056
Pine Nut Mountain, NV	0.061	0.051	0.060	0.082	0.072	0.063	0.074
Powell Mountain, NV	0.068	0.048	0.056	0.090	0.073	0.103	0.060
Red Rock, NV	0.051	0.045	0.040	0.063	0.062	0.078	0.039
Reveille, NV	0.054	0.040	0.037	0.076	0.056	0.059	0.065
Roberts Mountain, NV	0.042	0.030	0.028	0.060	0.052	0.072	0.047
Rock Creek, NV (2002)	0.074	0.050	0.049	0.076	0.078	0.096	0.072
Rock Creek, NV (2010)	0.061	0.035	0.036	0.063	0.060	0.075	0.051
Rocky Hills, NV	0.046	0.026	0.023	0.045	0.043	0.064	0.041
Rodeo Creek, NV	0.033	0.023	0.015	0.048	0.045	0.067	0.028
Saulsbery, NV	0.037	0.020	0.021	0.051	0.036	0.057	0.039
Sand Springs East, NV	0.041	0.029	0.029	0.046	0.036	0.059	0.045
Seven Mile, NV	0.048	0.043	0.035	0.041	0.046	0.063	0.047
Shawave Mountains, NV	0.033	0.026	0.029	0.045	0.046	0.067	0.030
Silver Peak, NV	0.043	0.031	0.036	0.056	0.053	0.073	0.050
Snowstorm, NV (Castle Ridge)	0.049	0.035	0.033	0.059	0.057	0.087	0.051
Snowstorm, NV (Dryhill)	0.067	0.076	0.073	0.086	0.080	0.126	0.072
South Shoshone, NV	0.036	0.025	0.023	0.045	0.048	0.068	0.038
Spruce-Pequop, NV (2011)	0.053	0.051	0.047	0.066	0.064	0.076	0.023
Stillwater, NV	0.046	0.042	0.041	0.064	0.054	0.084	0.051
Stone Cabin, NV	0.037	0.020	0.015	0.051	0.035	0.053	0.040
Warm Springs, NV	0.034	0.041	0.035	0.046	0.037	0.075	0.046
Warm Springs Canyon, NV	0.027	0.032	0.027	0.036	0.028	0.059	0.036
Wheeler Pass, NV	0.079	0.058	0.055	0.092	0.075	0.079	0.059
Wheeler Pass, NV (2007)	0.033	0.027	0.030	0.052	0.050	0.067	0.035
Alvord Tule, OR	0.040	0.036	0.033	0.049	0.058	0.072	0.040
Beatys Butte, OR	0.031	0.023	0.022	0.033	0.032	0.056	0.029
Beatys Butte, OR (2010)	0.028	0.027	0.029	0.043	0.038	0.065	0.030
Big Summit, OR (2010)	0.116	0.103	0.087	0.145	0.137	0.154	0.096
Cold Spring, OR	0.042	0.024	0.028	0.045	0.046	0.063	0.038
Cold Spring, OR (2010)	0.047	0.031	0.034	0.057	0.059	0.074	0.046
Coyote Lake, OR	0.046	0.027	0.030	0.050	0.053	0.072	0.051
Coyote Lake, OR (2011)	0.035	0.021	0.025	0.045	0.042	0.066	0.039

continued

Fishnet, OR	0.040	0.031	0.037	0.045	0.049	0.092	0.053
Hog Creek, OR	0.039	0.029	0.031	0.062	0.055	0.069	0.049
Jackies Butte, OR	0.047	0.040	0.039	0.063	0.052	0.072	0.049
Jackies Butte, OR (2011)	0.033	0.036	0.032	0.051	0.043	0.073	0.038
Kiger, OR (2011)	0.043	0.031	0.040	0.050	0.060	0.082	0.049
Kiger Herd, OR (2009)	0.046	0.035	0.043	0.058	0.068	0.081	0.057
Liggett Table, OR	0.167	0.149	0.153	0.135	0.164	0.180	0.167
Murderers Creek, OR (2001)	0.078	0.063	0.064	0.075	0.096	0.126	0.083
Murderers Creek, OR (2009)	0.064	0.045	0.052	0.064	0.072	0.099	0.071
Paisley Desert, OR	0.029	0.019	0.019	0.046	0.041	0.053	0.030
Riddle Herd, OR (2009)	0.053	0.041	0.049	0.066	0.067	0.095	0.062
Riddle Mountain, OR	0.057	0.040	0.049	0.060	0.064	0.086	0.057
Riddle Mountain, OR (2011)	0.061	0.046	0.051	0.077	0.077	0.105	0.067
Sand Springs, OR (2011)	0.033	0.025	0.033	0.054	0.049	0.069	0.041
Sheepshead, OR	0.036	0.022	0.026	0.043	0.045	0.062	0.040
Sheepshead, OR (2011)	0.037	0.021	0.024	0.047	0.047	0.061	0.040
South Steens, OR	0.036	0.025	0.024	0.048	0.041	0.060	0.032
South Steens, OR (2010)	0.030	0.028	0.026	0.045	0.035	0.064	0.033
Stinkingwater, OR	0.073	0.057	0.060	0.046	0.068	0.093	0.070
Three Fingers, OR	0.053	0.037	0.039	0.049	0.052	0.087	0.058
Three Fingers, OR (2011)	0.051	0.031	0.036	0.047	0.046	0.079	0.049
Warm Springs, OR	0.035	0.022	0.024	0.041	0.033	0.057	0.035
Warm Springs, OR (2010)	0.036	0.021	0.024	0.043	0.029	0.055	0.035
Blawn Wash, UT	0.062	0.068	0.059	0.091	0.066	0.118	0.074
Cedar Mountain, UT	0.047	0.039	0.034	0.060	0.047	0.073	0.046
Cedar Ridge, UT	0.072	0.056	0.054	0.076	0.088	0.125	0.079
Cedar Ridge, UT (trap)	0.075	0.064	0.057	0.093	0.105	0.138	0.077
Cold Springs, UT (2006)	0.087	0.100	0.098	0.091	0.090	0.146	0.105
Cold Springs, UT (trap)	0.065	0.072	0.066	0.080	0.075	0.120	0.077
Delta, UT	0.034	0.021	0.022	0.052	0.053	0.056	0.033
Hill Creek, UT	0.042	0.029	0.028	0.067	0.062	0.078	0.043
Muddy Creek, UT	0.090	0.079	0.070	0.092	0.114	0.109	0.084
North Hills, UT	0.089	0.061	0.058	0.074	0.083	0.094	0.065
Range Creek, UT	0.045	0.043	0.042	0.049	0.056	0.101	0.059
Sinbad, UT	0.063	0.058	0.068	0.096	0.078	0.090	0.084
Sulphur, UT	0.101	0.081	0.082	0.114	0.096	0.111	0.098
Sulphur Herd, UT (South, 2006)	0.064	0.046	0.050	0.070	0.067	0.085	0.064

TABLE F-2 Continued

	Calico Mountains, NV (2011)	Callaghan, NV (Austin Allot)	Callaghan, NV (East Allot)	Catnip Herd, NV	Chimney Creek, NV	Desatoya Mountain, NV	Dolly Varden, NV
Tilley Creek, UT	0.073	0.066	0.061	0.095	0.083	0.134	0.074
Winter Ridge, UT	0.035	0.030	0.030	0.058	0.057	0.081	0.037
Adobe Town, WY	0.046	0.026	0.027	0.052	0.052	0.064	0.037
Adobe Town, WY (2011)	0.030	0.026	0.024	0.045	0.041	0.070	0.028
Antelope Hills, WY	0.045	0.044	0.046	0.051	0.051	0.057	0.058
Conant Creek, WY (Lander)	0.059	0.048	0.047	0.085	0.074	0.117	0.074
Cooper Creek, WY	0.038	0.021	0.027	0.059	0.044	0.048	0.044
Dishpan Butte, WY (Lander)	0.057	0.033	0.038	0.061	0.068	0.079	0.055
Divide Basin, WY	0.030	0.020	0.021	0.035	0.038	0.053	0.028
Divide Basin, WY (2011)	0.036	0.023	0.020	0.040	0.038	0.061	0.031
Eagles Nest, WY	0.067	0.053	0.047	0.071	0.088	0.087	0.063
Happy Creek Springs, WY	0.047	0.038	0.049	0.064	0.067	0.079	0.073
Little Colorado, WY	0.044	0.034	0.033	0.046	0.055	0.081	0.041
Little Colorado, WY (2011)	0.037	0.030	0.032	0.041	0.049	0.078	0.038
Lost Creek, WY	0.036	0.023	0.023	0.045	0.049	0.054	0.036
Lost Creek, WY (combined)	0.036	0.025	0.024	0.050	0.054	0.059	0.040
McCullough Peaks, WY	0.043	0.035	0.041	0.060	0.048	0.083	0.056
Muskat Basin, WY (Lander)	0.057	0.035	0.039	0.062	0.069	0.082	0.053
Salt Wells, WY (East)	0.029	0.021	0.017	0.042	0.036	0.061	0.027
Salt Wells, WY (West)	0.038	0.020	0.024	0.057	0.047	0.063	0.044
Stewart Creek, WY	0.043	0.032	0.034	0.052	0.058	0.070	0.050
Stewart Creek, WY (2009)	0.042	0.033	0.035	0.064	0.062	0.072	0.051
White Mountain, WY (2011)	0.027	0.037	0.039	0.060	0.054	0.091	0.037
	Dry Lake, NV	Fish Creek, NV	Goshute, NV	Goshute, NV (2011)	Granite, NV	Granite Range, NV	Granite Range, NV (2011)
Dry Lake, NV	0.000						
Fish Creek, NV	0.043	0.000					
Goshute, NV	0.056	0.055	0.000				
Goshute, NV (2011)	0.057	0.053	0.009	0.000			
Granite, NV	0.045	0.027	0.048	0.047	0.000		
Granite Range, NV	0.042	0.038	0.050	0.049	0.015	0.000	

Granite Range, NV (2011)	0.036	0.030	0.040	0.041	0.011	0.04	0.11	0.000
Grass Valley, NV	0.039	0.035	0.051	0.047	0.038	0.047	0.037	0.037
Hall Creek, NV	0.031	0.031	0.051	0.049	0.034	0.039	0.039	0.030
Jakes Wash, NV	0.058	0.067	0.077	0.068	0.073	0.069	0.069	0.061
Johnnie, NV	0.053	0.052	0.063	0.059	0.063	0.066	0.066	0.059
Lahanton Reservoir, NV	0.061	0.060	0.059	0.062	0.066	0.069	0.069	0.052
Little Fish Lake, NV	0.050	0.052	0.054	0.046	0.047	0.049	0.049	0.044
Little Highrock Canyon, NV	0.044	0.050	0.056	0.054	0.041	0.036	0.036	0.029
Little Humboldt, NV	0.067	0.060	0.072	0.065	0.050	0.047	0.047	0.049
Little Humboldt, NV (2010)	0.055	0.048	0.061	0.056	0.036	0.036	0.036	0.035
Little Owyhee, NV (Fairbanks)	0.055	0.046	0.060	0.057	0.041	0.047	0.047	0.043
Little Owyhee, NV (Lake Creek)	0.059	0.054	0.069	0.071	0.054	0.050	0.050	0.046
Little Owyhee, NV (Twin Valley)	0.054	0.032	0.059	0.058	0.036	0.038	0.038	0.033
Marvel Gap, NV (SWC 2010)	0.054	0.040	0.058	0.055	0.043	0.042	0.042	0.038
McGee Mountain, NV	0.039	0.032	0.046	0.041	0.032	0.034	0.034	0.036
Miller Mountain, NV (SWC 2010)	0.039	0.030	0.060	0.053	0.032	0.037	0.037	0.034
Montezuma Peak, NV	0.062	0.052	0.056	0.056	0.055	0.056	0.056	0.044
Nellis, NV	0.032	0.026	0.047	0.041	0.029	0.036	0.036	0.030
New Pass-Ravenswood, NV	0.028	0.029	0.042	0.042	0.031	0.034	0.034	0.025
North Stillwater, NV	0.053	0.040	0.055	0.054	0.036	0.035	0.035	0.027
Paymaster, NV (2006)	0.053	0.055	0.061	0.055	0.057	0.057	0.057	0.048
Paymaster, NV (2010)	0.048	0.056	0.058	0.054	0.058	0.057	0.057	0.046
Pine Nut Mountain, NV	0.048	0.046	0.085	0.083	0.064	0.067	0.067	0.054
Powell Mountain, NV	0.062	0.061	0.071	0.069	0.060	0.062	0.062	0.053
Red Rock, NV	0.056	0.050	0.051	0.045	0.050	0.050	0.050	0.045
Reveille, NV	0.049	0.042	0.070	0.066	0.040	0.049	0.049	0.050
Roberts Mountain, NV	0.055	0.036	0.057	0.050	0.037	0.040	0.040	0.039
Rock Creek, NV (2002)	0.066	0.064	0.085	0.077	0.072	0.070	0.070	0.068
Rock Creek, NV (2010)	0.055	0.052	0.062	0.053	0.055	0.056	0.056	0.054
Rocky Hills, NV	0.035	0.038	0.050	0.046	0.045	0.046	0.046	0.039
Rodeo Creek, NV	0.041	0.034	0.047	0.043	0.029	0.025	0.025	0.027
Saulsberry, NV	0.030	0.039	0.053	0.047	0.033	0.038	0.038	0.030
Sand Springs East, NV	0.040	0.032	0.046	0.041	0.030	0.032	0.032	0.035
Seven Mile, NV	0.046	0.055	0.053	0.051	0.054	0.048	0.048	0.045
Shawave Mountains, NV	0.043	0.038	0.043	0.045	0.035	0.037	0.037	0.034
Silver Peak, NV	0.051	0.049	0.066	0.062	0.040	0.064	0.064	0.029
Snowstorm, NV (Castle Ridge)	0.053	0.052	0.060	0.054	0.044	0.051	0.051	0.040

continued

TABLE F-2 Continued

	Dry Lake, NV	Fish Creek, NV	Goshute, NV	Granite, NV	Granite Range, NV	Granite Range, NV (2011)
Snowstorm, NV (Dryhill)	0.094	0.075	0.091	0.070	0.073	0.061
South Shoshone, NV	0.045	0.034	0.043	0.037	0.038	0.030
Spruce-Peupop, NV (2011)	0.065	0.050	0.036	0.053	0.058	0.048
Stillwater, NV	0.065	0.045	0.060	0.050	0.045	0.039
Stone Cabin, NV	0.036	0.034	0.048	0.033	0.036	0.031
Warm Springs, NV	0.059	0.048	0.058	0.034	0.042	0.033
Warm Springs Canyon, NV	0.046	0.040	0.050	0.032	0.034	0.030
Wheeler Pass, NV	0.071	0.072	0.072	0.075	0.074	0.071
Wheeler Pass, NV (2007)	0.038	0.036	0.050	0.035	0.042	0.030
Alvord Tule, OR	0.057	0.044	0.071	0.038	0.041	0.038
Beatys Butte, OR	0.032	0.030	0.041	0.028	0.028	0.022
Beatys Butte, OR (2010)	0.041	0.037	0.042	0.031	0.032	0.026
Big Summit, OR (2010)	0.123	0.124	0.142	0.114	0.112	0.109
Cold Spring, OR	0.040	0.037	0.055	0.042	0.039	0.034
Cold Spring, OR (2010)	0.049	0.044	0.063	0.047	0.047	0.038
Coyote Lake, OR	0.051	0.036	0.070	0.040	0.043	0.043
Coyote Lake, OR (2011)	0.045	0.024	0.056	0.027	0.033	0.028
Fishnet, OR	0.047	0.034	0.063	0.041	0.052	0.037
Hog Creek, OR	0.036	0.032	0.065	0.035	0.040	0.032
Jackies Butte, OR	0.047	0.053	0.066	0.051	0.051	0.044
Jackies Butte, OR (2011)	0.040	0.043	0.056	0.041	0.040	0.034
Kiger, OR (2011)	0.043	0.046	0.064	0.039	0.040	0.034
Kiger Herd, OR (2009)	0.049	0.046	0.079	0.043	0.045	0.042
Liggett Table, OR	0.192	0.155	0.180	0.162	0.160	0.155
Murderers Creek, OR (2001)	0.097	0.088	0.107	0.084	0.078	0.074
Murderers Creek, OR (2009)	0.070	0.073	0.083	0.068	0.057	0.055
Paisley Desert, OR	0.037	0.026	0.043	0.025	0.024	0.022
Riddle Herd, OR (2009)	0.061	0.051	0.079	0.047	0.047	0.042
Riddle Mountain, OR	0.052	0.053	0.073	0.054	0.049	0.044
Riddle Mountain, OR (2011)	0.069	0.056	0.089	0.053	0.052	0.048
Sand Springs, OR (2011)	0.034	0.034	0.054	0.032	0.031	0.025
Sheepshead, OR	0.039	0.039	0.052	0.040	0.034	0.031
Sheepshead, OR (2011)	0.036	0.033	0.048	0.039	0.037	0.029
South Steens, OR	0.042	0.033	0.051	0.037	0.033	0.032

South Steens, OR (2010)	0.034	0.033	0.047	0.047	0.035	0.032	0.029
Stinkingwater, OR	0.066	0.058	0.086	0.078	0.075	0.078	0.072
Three Fingers, OR	0.061	0.047	0.069	0.058	0.047	0.046	0.043
Three Fingers, OR (2011)	0.059	0.040	0.062	0.049	0.046	0.052	0.044
Warm Springs, OR	0.032	0.033	0.048	0.040	0.039	0.038	0.033
Warm Springs, OR (2010)	0.034	0.030	0.050	0.044	0.034	0.034	0.031
Blawn Wash, UT	0.057	0.078	0.078	0.075	0.067	0.064	0.054
Cedar Mountain, UT	0.060	0.042	0.075	0.071	0.039	0.040	0.034
Cedar Ridge, UT	0.089	0.065	0.109	0.099	0.065	0.072	0.066
Cedar Ridge, UT (trap)	0.100	0.074	0.120	0.110	0.073	0.080	0.072
Cold Springs, UT (2006)	0.108	0.100	0.125	0.118	0.086	0.091	0.089
Cold Springs, UT (trap)	0.078	0.078	0.097	0.091	0.064	0.067	0.063
Delta, UT	0.039	0.028	0.052	0.050	0.030	0.031	0.028
Hill Creek, UT	0.057	0.044	0.063	0.061	0.043	0.042	0.037
Muddy Creek, UT	0.084	0.099	0.091	0.078	0.085	0.085	0.076
North Hills, UT	0.077	0.076	0.101	0.098	0.080	0.070	0.076
Range Creek, UT	0.064	0.048	0.083	0.075	0.041	0.047	0.043
Sinbad, UT	0.059	0.062	0.089	0.091	0.069	0.070	0.061
Sulphur, UT	0.094	0.097	0.124	0.119	0.094	0.089	0.093
Sulphur Herd, UT (South, 2006)	0.070	0.065	0.084	0.074	0.065	0.048	0.055
Tilley Creek, UT	0.077	0.084	0.086	0.089	0.069	0.064	0.054
Winter Ridge, UT	0.058	0.046	0.054	0.055	0.040	0.047	0.032
Adobe Town, WY	0.046	0.037	0.053	0.048	0.043	0.042	0.040
Adobe Town, WY (2011)	0.045	0.036	0.044	0.041	0.034	0.033	0.028
Antelope Hills, WY	0.055	0.045	0.068	0.063	0.038	0.034	0.038
Conant Creek, WY (Lander)	0.070	0.063	0.078	0.069	0.058	0.049	0.047
Cooper Creek, WY	0.033	0.032	0.059	0.054	0.035	0.034	0.033
Dishpan Butte, WY (Lander)	0.054	0.045	0.061	0.056	0.049	0.046	0.045
Divide Basin, WY	0.034	0.032	0.040	0.036	0.028	0.028	0.024
Divide Basin, WY (2011)	0.036	0.035	0.044	0.039	0.031	0.031	0.029
Eagles Nest, WY	0.080	0.060	0.077	0.069	0.067	0.062	0.059
Happy Creek Springs, WY	0.049	0.054	0.078	0.070	0.057	0.058	0.052
Little Colorado, WY	0.050	0.051	0.064	0.057	0.047	0.043	0.042
Little Colorado, WY (2011)	0.043	0.043	0.055	0.051	0.041	0.038	0.034
Lost Creek, WY	0.044	0.036	0.051	0.043	0.036	0.035	0.028
Lost Creek, WY (combined)	0.044	0.041	0.052	0.044	0.041	0.038	0.031
McCullough Peaks, WY	0.044	0.040	0.065	0.065	0.048	0.048	0.041

TABLE F-2 Continued

	Dry Lake, NV	Fish Creek, NV	Goshute, NV	Goshute, NV (2011)	Granite, NV	Granite Range, NV	Granite Range, NV (2011)
Muskkrat Basin, WY (Lander)	0.065	0.046	0.059	0.052	0.047	0.051	0.046
Salt Wells, WY (East)	0.039	0.035	0.047	0.041	0.033	0.029	0.025
Salt Wells, WY (West)	0.035	0.033	0.050	0.049	0.032	0.040	0.033
Stewart Creek, WY	0.057	0.041	0.065	0.055	0.041	0.040	0.039
Stewart Creek, WY (2009)	0.052	0.048	0.064	0.058	0.049	0.052	0.045
White Mountain, WY (2011)	0.042	0.046	0.046	0.049	0.031	0.038	0.024
Grass Valley, NV							
Grass Valley, NV	0.000						
Hall Creek, NV	0.021	0.000					
Jakes Wash, NV	0.059	0.054	0.000				
Johnnie, NV	0.049	0.052	0.083	0.000			
Lahanton Reservoir, NV	0.062	0.058	0.088	0.090	0.000		
Little Fish Lake, NV	0.033	0.040	0.065	0.077	0.064	0.000	
Little Highrock Canyon, NV	0.051	0.048	0.084	0.066	0.062	0.066	0.000
Little Humboldt, NV	0.046	0.051	0.079	0.072	0.073	0.046	0.068
Little Humboldt, NV (2010)	0.038	0.038	0.064	0.062	0.055	0.043	0.048
Little Owyhee, NV (Fairbanks)	0.034	0.033	0.078	0.061	0.086	0.057	0.062
Little Owyhee, NV (Lake Creek)	0.037	0.045	0.089	0.064	0.078	0.056	0.056
Little Owyhee, NV (Twin Valley)	0.043	0.045	0.077	0.052	0.068	0.068	0.052
Marvel Gap, NV (SWC 2010)	0.029	0.036	0.065	0.052	0.064	0.049	0.051
McGee Mountain, NV	0.034	0.035	0.059	0.049	0.058	0.039	0.052
Miller Mountain, NV (SWC 2010)	0.029	0.026	0.061	0.050	0.063	0.041	0.048
Montezuma Peak, NV	0.050	0.057	0.088	0.094	0.068	0.052	0.046
Nellis, NV	0.022	0.028	0.055	0.045	0.053	0.035	0.051
New Pass-Ravenswood, NV	0.027	0.023	0.049	0.039	0.045	0.045	0.039
North Stillwater, NV	0.044	0.035	0.069	0.068	0.074	0.056	0.047
Paymaster, NV (2006)	0.051	0.052	0.080	0.084	0.070	0.051	0.049
Paymaster, NV (2010)	0.053	0.052	0.079	0.088	0.067	0.053	0.046
Pine Nut Mountain, NV	0.063	0.051	0.065	0.061	0.087	0.073	0.073
Powell Mountain, NV	0.064	0.039	0.094	0.087	0.086	0.075	0.077
Red Rock, NV	0.040	0.051	0.073	0.046	0.072	0.048	0.054

Reveille, NV	0.044	0.043	0.067	0.065	0.072	0.062	0.070
Roberts Mountain, NV	0.026	0.037	0.070	0.054	0.074	0.052	0.055
Rock Creek, NV (2002)	0.054	0.057	0.078	0.064	0.089	0.073	0.075
Rock Creek, NV (2010)	0.039	0.040	0.064	0.050	0.074	0.052	0.064
Rocky Hills, NV	0.028	0.034	0.067	0.053	0.044	0.045	0.043
Rodeo Creek, NV	0.023	0.023	0.066	0.053	0.058	0.039	0.036
Saulsbury, NV	0.025	0.023	0.057	0.055	0.050	0.032	0.041
Sand Springs East, NV	0.034	0.034	0.059	0.050	0.058	0.039	0.053
Seven Mile, NV	0.037	0.055	0.067	0.062	0.054	0.039	0.055
Shawave Mountains, NV	0.027	0.024	0.068	0.057	0.061	0.045	0.039
Silver Peak, NV	0.043	0.042	0.056	0.072	0.074	0.060	0.059
Snowstorm, NV (Castle Ridge)	0.044	0.039	0.067	0.073	0.056	0.053	0.052
Snowstorm, NV (Dryhill)	0.080	0.081	0.095	0.108	0.095	0.095	0.070
South Shoshone, NV	0.030	0.031	0.052	0.045	0.060	0.033	0.048
Spruce-Pequot, NV (2011)	0.049	0.052	0.080	0.053	0.084	0.073	0.062
Stillwater, NV	0.050	0.045	0.067	0.079	0.074	0.061	0.053
Stone Cabin, NV	0.017	0.026	0.055	0.048	0.059	0.038	0.049
Warm Springs, NV	0.048	0.045	0.078	0.060	0.069	0.064	0.053
Warm Springs Canyon, NV	0.034	0.037	0.063	0.050	0.067	0.052	0.042
Wheeler Pass, NV	0.055	0.067	0.104	0.023	0.103	0.085	0.079
Wheeler Pass, NV (2007)	0.035	0.027	0.069	0.027	0.064	0.045	0.039
Alvord Tule, OR	0.033	0.038	0.068	0.057	0.086	0.068	0.059
Beatys Butte, OR	0.028	0.023	0.055	0.051	0.039	0.042	0.042
Beatys Butte, OR (2010)	0.031	0.027	0.062	0.061	0.056	0.045	0.037
Big Summit, OR (2010)	0.093	0.103	0.149	0.144	0.128	0.117	0.110
Cold Spring, OR	0.031	0.034	0.044	0.049	0.063	0.039	0.046
Cold Spring, OR (2010)	0.040	0.043	0.056	0.057	0.066	0.044	0.050
Coyote Lake, OR	0.028	0.037	0.060	0.055	0.083	0.055	0.069
Coyote Lake, OR (2011)	0.026	0.027	0.056	0.051	0.066	0.048	0.055
Fishnet, OR	0.044	0.039	0.061	0.068	0.068	0.065	0.054
Hog Creek, OR	0.032	0.034	0.058	0.052	0.065	0.055	0.052
Jackies Butte, OR	0.044	0.040	0.076	0.063	0.067	0.065	0.059
Jackies Butte, OR (2011)	0.038	0.039	0.072	0.051	0.063	0.061	0.043
Kiger, OR (2011)	0.041	0.032	0.063	0.074	0.064	0.056	0.059
Kiger Herd, OR (2009)	0.044	0.039	0.066	0.064	0.079	0.069	0.067
Liggett Table, OR	0.158	0.164	0.204	0.192	0.163	0.182	0.187
Murderers Creek, OR (2001)	0.073	0.080	0.091	0.102	0.089	0.077	0.089

TABLE F-2 Continued

	Grass Valley, NV	Hall Creek, NV	Jakes Wash, NV	Johnnie, NV	Lahonton Reservoir, NV	Little Fish Lake, NV	Little Highrock Canyon, NV
Murderers Creek, OR (2009)	0.055	0.060	0.072	0.095	0.072	0.055	0.070
Paisley Desert, OR	0.024	0.023	0.051	0.039	0.057	0.044	0.041
Riddle Herd, OR (2009)	0.057	0.045	0.077	0.079	0.068	0.072	0.064
Riddle Mountain, OR	0.056	0.042	0.071	0.075	0.064	0.071	0.062
Riddle Mountain, OR (2011)	0.059	0.050	0.080	0.087	0.082	0.079	0.073
Sand Springs, OR (2011)	0.035	0.029	0.059	0.061	0.070	0.053	0.043
Sheepshead, OR	0.026	0.026	0.050	0.047	0.069	0.039	0.050
Sheepshead, OR (2011)	0.031	0.023	0.045	0.043	0.058	0.040	0.040
South Steens, OR	0.024	0.030	0.054	0.039	0.077	0.056	0.045
South Steens, OR (2010)	0.026	0.030	0.058	0.044	0.062	0.053	0.039
Stinkingwater, OR	0.063	0.059	0.089	0.061	0.081	0.082	0.085
Three Fingers, OR	0.045	0.042	0.082	0.078	0.068	0.053	0.067
Three Fingers, OR (2011)	0.037	0.039	0.065	0.060	0.068	0.048	0.064
Warm Springs, OR	0.025	0.030	0.043	0.046	0.055	0.044	0.040
Warm Springs, OR (2010)	0.025	0.030	0.052	0.050	0.052	0.044	0.043
Blawn Wash, UT	0.078	0.066	0.099	0.089	0.088	0.095	0.071
Cedar Mountain, UT	0.040	0.046	0.077	0.059	0.081	0.063	0.064
Cedar Ridge, UT	0.058	0.064	0.103	0.103	0.107	0.074	0.090
Cedar Ridge, UT (trap)	0.060	0.066	0.112	0.106	0.126	0.088	0.087
Cold Springs, UT (2006)	0.101	0.111	0.136	0.127	0.142	0.118	0.094
Cold Springs, UT (trap)	0.075	0.076	0.093	0.088	0.122	0.089	0.077
Delta, UT	0.025	0.024	0.052	0.040	0.058	0.036	0.047
Hill Creek, UT	0.030	0.032	0.083	0.053	0.077	0.065	0.048
Muddy Creek, UT	0.076	0.084	0.091	0.102	0.109	0.075	0.102
North Hills, UT	0.052	0.069	0.096	0.081	0.094	0.073	0.088
Range Creek, UT	0.045	0.052	0.085	0.080	0.090	0.061	0.059
Simbad, UT	0.071	0.054	0.084	0.082	0.101	0.078	0.074
Sulphur, UT	0.073	0.087	0.128	0.128	0.119	0.086	0.107
Sulphur Herd, UT (South, 2006)	0.049	0.058	0.078	0.066	0.088	0.071	0.067
Tilley Creek, UT	0.083	0.073	0.103	0.105	0.091	0.086	0.066
Winter Ridge, UT	0.037	0.036	0.082	0.054	0.063	0.051	0.043
Adobe Town, WY	0.028	0.026	0.057	0.052	0.064	0.043	0.054
Adobe Town, WY (2011)	0.027	0.031	0.062	0.054	0.057	0.046	0.035
Antelope Hills, WY	0.048	0.047	0.074	0.063	0.063	0.061	0.056

Conant Creek, WY (Lander)	0.064	0.049	0.084	0.093	0.100	0.069	0.074
Cooper Creek, WY	0.025	0.028	0.053	0.046	0.059	0.043	0.048
Dishpan Butte, WY (Lander)	0.045	0.039	0.069	0.056	0.086	0.044	0.070
Divide Basin, WY	0.025	0.026	0.052	0.041	0.053	0.033	0.037
Divide Basin, WY (2011)	0.022	0.026	0.061	0.046	0.060	0.028	0.039
Eagles Nest, WY	0.051	0.060	0.080	0.073	0.083	0.069	0.075
Happy Creek Springs, WY	0.046	0.050	0.080	0.060	0.083	0.066	0.063
Little Colorado, WY	0.037	0.041	0.076	0.048	0.074	0.057	0.048
Little Colorado, WY (2011)	0.038	0.037	0.068	0.043	0.063	0.054	0.040
Lost Creek, WY	0.023	0.026	0.058	0.045	0.061	0.041	0.045
Lost Creek, WY (combined)	0.026	0.032	0.053	0.042	0.064	0.038	0.041
McCullough Peaks, WY	0.047	0.039	0.069	0.052	0.075	0.068	0.052
Muskkrat Basin, WY (Lander)	0.043	0.041	0.065	0.060	0.089	0.048	0.078
Salt Wells, WY (East)	0.021	0.026	0.058	0.054	0.055	0.040	0.036
Salt Wells, WY (West)	0.031	0.024	0.056	0.054	0.050	0.044	0.047
Stewart Creek, WY	0.032	0.036	0.063	0.052	0.079	0.057	0.056
Stewart Creek, WY (2009)	0.040	0.040	0.067	0.056	0.076	0.052	0.056
White Mountain, WY (2011)	0.051	0.039	0.077	0.071	0.046	0.048	0.032
	Little Humboldt, NV	Little Humboldt, NV (2010)	Little Owyhee, NV (Fairbanks)	Little Owyhee, NV (Lake Creek)	Little Owyhee, NV (Twin Valley)	Marvel Gap, NV (SWC 2010)	McGee Mountain, NV
Little Humboldt, NV	0.000						
Little Humboldt, NV (2010)	0.017	0.000					
Little Owyhee, NV (Fairbanks)	0.071	0.059	0.000				
Little Owyhee, NV (Lake Creek)	0.057	0.047	0.046	0.000			
Little Owyhee, NV (Twin Valley)	0.059	0.048	0.051	0.039	0.000		
Marvel Gap, NV (SWC 2010)	0.042	0.039	0.063	0.046	0.045	0.000	
McGee Mountain, NV	0.043	0.034	0.048	0.046	0.039	0.036	0.000
Miller Mountain, NV (SWC 2010)	0.052	0.040	0.044	0.041	0.041	0.035	0.036
Montezuma Peak, NV	0.080	0.064	0.075	0.061	0.059	0.050	0.054
Nellis, NV	0.048	0.037	0.041	0.047	0.043	0.030	0.023
New Pass-Ravenswood, NV	0.047	0.031	0.047	0.042	0.033	0.034	0.026
North Stillwater, NV	0.071	0.051	0.049	0.051	0.054	0.044	0.044
Paymaster, NV (2006)	0.070	0.063	0.074	0.069	0.065	0.052	0.050
Paymaster, NV (2010)	0.077	0.066	0.075	0.070	0.066	0.055	0.053

continued

TABLE F-2 Continued

	Little Humboldt, NV	Little Humboldt, NV (2010)	Little Owyhee, NV (Fairbanks)	Little Owyhee, NV (Lake Creek)	Little Owyhee, NV (Twin Valley)	Marvel Gap, NV (SWC 2010)	McGee Mountain, NV
Pine Nut Mountain, NV	0.082	0.071	0.075	0.088	0.064	0.070	0.056
Powell Mountain, NV	0.081	0.063	0.061	0.086	0.074	0.071	0.063
Red Rock, NV	0.062	0.057	0.052	0.066	0.050	0.046	0.040
Reveille, NV	0.064	0.049	0.062	0.067	0.058	0.052	0.037
Roberts Mountain, NV	0.060	0.050	0.039	0.054	0.050	0.038	0.035
Rock Creek, NV (2002)	0.063	0.044	0.078	0.072	0.059	0.067	0.052
Rock Creek, NV (2010)	0.041	0.026	0.062	0.055	0.048	0.049	0.034
Rocky Hills, NV	0.058	0.047	0.062	0.064	0.051	0.034	0.035
Rodeo Creek, NV	0.044	0.030	0.042	0.047	0.043	0.033	0.028
Saulsbery, NV	0.050	0.035	0.046	0.047	0.045	0.044	0.029
Sand Springs East, NV	0.038	0.030	0.046	0.047	0.038	0.034	0.001
Seven Mile, NV	0.053	0.049	0.071	0.062	0.062	0.041	0.036
Shawave Mountains, NV	0.050	0.038	0.038	0.038	0.041	0.035	0.037
Silver Peak, NV	0.053	0.046	0.061	0.052	0.045	0.048	0.053
Snowstorm, NV (Castle Ridge)	0.034	0.019	0.063	0.052	0.052	0.047	0.045
Snowstorm, NV (Dryhill)	0.091	0.079	0.089	0.074	0.069	0.074	0.083
South Shoshone, NV	0.042	0.033	0.056	0.054	0.045	0.027	0.027
Spruce-Peupop, NV (2011)	0.075	0.067	0.052	0.063	0.058	0.055	0.057
Stillwater, NV	0.071	0.051	0.061	0.053	0.058	0.047	0.046
Stone Cabin, NV	0.046	0.037	0.039	0.042	0.039	0.037	0.029
Warm Springs, NV	0.065	0.050	0.065	0.056	0.040	0.044	0.035
Warm Springs Canyon, NV	0.060	0.042	0.051	0.045	0.037	0.037	0.030
Wheeler Pass, NV	0.077	0.067	0.073	0.076	0.071	0.068	0.059
Wheeler Pass, NV (2007)	0.044	0.036	0.046	0.051	0.049	0.034	0.035
Alvord Tule, OR	0.061	0.047	0.056	0.063	0.048	0.036	0.043
Beatys Butte, OR	0.041	0.031	0.049	0.041	0.033	0.034	0.027
Beatys Butte, OR (2010)	0.051	0.036	0.044	0.035	0.038	0.032	0.037
Big Summit, OR (2010)	0.083	0.084	0.131	0.126	0.130	0.111	0.118
Cold Spring, OR	0.052	0.044	0.049	0.051	0.042	0.033	0.042
Cold Spring, OR (2010)	0.056	0.047	0.064	0.060	0.051	0.034	0.051
Coyote Lake, OR	0.059	0.048	0.049	0.057	0.051	0.040	0.041
Coyote Lake, OR (2011)	0.044	0.034	0.042	0.050	0.039	0.029	0.030
Fishnet, OR	0.076	0.056	0.066	0.064	0.054	0.042	0.049

continued

Hog Creek, OR	0.064	0.046	0.050	0.058	0.038	0.039	0.041
Jackies Butte, OR	0.072	0.058	0.062	0.078	0.059	0.051	0.053
Jackies Butte, OR (2011)	0.065	0.050	0.054	0.064	0.045	0.042	0.040
Kiger, OR (2011)	0.058	0.049	0.065	0.065	0.055	0.051	0.046
Kiger Herd, OR (2009)	0.064	0.055	0.067	0.070	0.057	0.051	0.048
Liggett Table, OR	0.188	0.178	0.198	0.175	0.138	0.148	0.153
Murderers Creek, OR (2001)	0.086	0.071	0.086	0.076	0.092	0.068	0.082
Murderers Creek, OR (2009)	0.073	0.061	0.069	0.067	0.082	0.061	0.066
Paisley Desert, OR	0.039	0.034	0.038	0.046	0.034	0.029	0.027
Riddle Herd, OR (2009)	0.067	0.056	0.081	0.069	0.051	0.063	0.047
Riddle Mountain, OR	0.062	0.053	0.084	0.069	0.050	0.060	0.046
Riddle Mountain, OR (2011)	0.070	0.060	0.087	0.076	0.055	0.069	0.055
Sand Springs, OR (2011)	0.048	0.040	0.047	0.051	0.040	0.036	0.039
Sheepshead, OR	0.050	0.043	0.040	0.051	0.053	0.035	0.038
Sheepshead, OR (2011)	0.046	0.038	0.046	0.053	0.048	0.030	0.034
South Steens, OR	0.052	0.042	0.044	0.037	0.030	0.029	0.036
South Steens, OR (2010)	0.057	0.042	0.041	0.039	0.030	0.039	0.035
Stinkingwater, OR	0.093	0.073	0.079	0.080	0.074	0.052	0.056
Three Fingers, OR	0.053	0.055	0.072	0.069	0.064	0.030	0.045
Three Fingers, OR (2011)	0.049	0.048	0.061	0.063	0.053	0.026	0.034
Warm Springs, OR	0.045	0.036	0.046	0.041	0.031	0.033	0.026
Warm Springs, OR (2010)	0.041	0.035	0.048	0.039	0.027	0.035	0.027
Blawn Wash, UT	0.103	0.080	0.092	0.106	0.075	0.094	0.070
Cedar Mountain, UT	0.064	0.049	0.062	0.050	0.037	0.049	0.051
Cedar Ridge, UT	0.065	0.060	0.097	0.080	0.081	0.060	0.073
Cedar Ridge, UT (trap)	0.080	0.066	0.100	0.086	0.089	0.068	0.090
Cold Springs, UT (2006)	0.128	0.109	0.129	0.114	0.104	0.085	0.083
Cold Springs, UT (trap)	0.095	0.078	0.095	0.092	0.082	0.067	0.057
Delta, UT	0.036	0.027	0.041	0.046	0.035	0.033	0.031
Hill Creek, UT	0.059	0.046	0.047	0.047	0.052	0.040	0.047
Muddy Creek, UT	0.101	0.095	0.097	0.117	0.109	0.086	0.085
North Hills, UT	0.058	0.058	0.089	0.071	0.069	0.058	0.071
Range Creek, UT	0.061	0.049	0.077	0.063	0.059	0.040	0.045
Sinbad, UT	0.083	0.069	0.076	0.088	0.079	0.086	0.061
Sulphur, UT	0.082	0.079	0.100	0.100	0.115	0.103	0.100
Sulphur Herd, UT (South, 2006)	0.054	0.047	0.067	0.060	0.060	0.050	0.057
Tilley Creek, UT	0.072	0.060	0.112	0.087	0.076	0.074	0.083

TABLE F-2 Continued

	Little Humboldt, NV	Little Humboldt, NV (2010)	Little Owyhee, NV (Fairbanks)	Little Owyhee, NV (Lake Creek)	Little Owyhee, NV (Twin Valley)	Marvel Gap, NV (SWC 2010)	McGee Mountain, NV
Winter Ridge, UT	0.058	0.043	0.051	0.044	0.054	0.032	0.052
Adobe Town, WY	0.043	0.036	0.046	0.045	0.045	0.021	0.037
Adobe Town, WY (2011)	0.046	0.036	0.048	0.038	0.038	0.015	0.037
Antelope Hills, WY	0.056	0.042	0.067	0.063	0.057	0.048	0.039
Conant Creek, WY (Lander)	0.084	0.072	0.062	0.071	0.077	0.077	0.064
Cooper Creek, WY	0.043	0.035	0.040	0.046	0.040	0.040	0.031
Dishpan Butte, WY (Lander)	0.047	0.045	0.057	0.055	0.054	0.042	0.037
Divide Basin, WY	0.032	0.023	0.044	0.033	0.033	0.030	0.028
Divide Basin, WY (2011)	0.031	0.024	0.044	0.033	0.041	0.032	0.029
Eagles Nest, WY	0.048	0.042	0.083	0.071	0.068	0.054	0.056
Happy Creek Springs, WY	0.073	0.061	0.068	0.073	0.076	0.051	0.058
Little Colorado, WY	0.045	0.040	0.063	0.052	0.047	0.033	0.039
Little Colorado, WY (2011)	0.045	0.036	0.059	0.048	0.040	0.032	0.035
Lost Creek, WY	0.040	0.029	0.046	0.045	0.043	0.027	0.032
Lost Creek, WY (combined)	0.041	0.031	0.049	0.044	0.042	0.031	0.032
McCullough Peaks, WY	0.061	0.046	0.056	0.051	0.047	0.051	0.043
Muskrat Basin, WY (Lander)	0.043	0.042	0.056	0.062	0.058	0.043	0.039
Salt Wells, WY (East)	0.046	0.033	0.044	0.043	0.041	0.022	0.036
Salt Wells, WY (West)	0.049	0.037	0.047	0.048	0.048	0.043	0.039
Stewart Creek, WY	0.044	0.035	0.054	0.060	0.047	0.042	0.036
Stewart Creek, WY (2009)	0.055	0.047	0.060	0.051	0.050	0.038	0.044
White Mountain, WY (2011)	0.062	0.041	0.062	0.060	0.054	0.049	0.048
Miller Mountain, NV (SWC 2010)	0.000	Montezuma Peak, NV	Nellis, NV	New Pass-Ravenswood, NV	North Stillwater, NV	Paymaster, NV (2006)	Paymaster, NV (2010)
Montezuma Peak, NV	0.060	0.000					
Nellis, NV	0.026	0.050	0.000				
New Pass-Ravenswood, NV	0.032	0.053	0.021	0.000			
North Stillwater, NV	0.042	0.052	0.043	0.038	0.000		
Paymaster, NV (2006)	0.058	0.018	0.049	0.053	0.058	0.000	

continued

Paymaster, NV (2010)	0.061	0.014	0.048	0.049	0.057	0.004	0.000
Pine Nut Mountain, NV	0.065	0.089	0.054	0.048	0.062	0.085	0.085
Powell Mountain, NV	0.063	0.082	0.062	0.059	0.062	0.083	0.082
Red Rock, NV	0.049	0.054	0.035	0.044	0.058	0.052	0.055
Reveille, NV	0.033	0.077	0.022	0.037	0.058	0.077	0.079
Roberts Mountain, NV	0.038	0.062	0.028	0.036	0.047	0.062	0.065
Rock Creek, NV (2002)	0.066	0.086	0.061	0.050	0.080	0.079	0.083
Rock Creek, NV (2010)	0.048	0.075	0.043	0.036	0.063	0.071	0.074
Rocky Hills, NV	0.034	0.052	0.027	0.030	0.058	0.052	0.052
Rodeo Creek, NV	0.032	0.037	0.027	0.031	0.029	0.041	0.042
Saulsbery, NV	0.032	0.051	0.026	0.020	0.039	0.049	0.049
Sand Springs East, NV	0.035	0.055	0.023	0.027	0.043	0.049	0.052
Seven Mile, NV	0.049	0.059	0.042	0.043	0.061	0.059	0.061
Shawave Mountains, NV	0.036	0.047	0.037	0.033	0.039	0.047	0.047
Silver Peak, NV	0.036	0.067	0.041	0.037	0.042	0.066	0.066
Snowstorm, NV (Castle Ridge)	0.043	0.065	0.042	0.038	0.060	0.060	0.063
Snowstorm, NV (Dryhill)	0.082	0.076	0.066	0.065	0.068	0.091	0.086
South Shoshone, NV	0.034	0.058	0.026	0.023	0.038	0.053	0.054
Spruce-Peupop, NV (2011)	0.059	0.066	0.049	0.042	0.059	0.076	0.074
Stillwater, NV	0.050	0.049	0.047	0.043	0.013	0.054	0.055
Stone Cabin, NV	0.028	0.052	0.015	0.025	0.039	0.051	0.053
Warm Springs, NV	0.036	0.067	0.036	0.035	0.050	0.070	0.070
Warm Springs Canyon, NV	0.032	0.056	0.030	0.025	0.039	0.061	0.061
Wheeler Pass, NV	0.063	0.092	0.059	0.058	0.077	0.087	0.094
Wheeler Pass, NV (2007)	0.030	0.062	0.031	0.028	0.040	0.055	0.058
Alvord Tule, OR	0.044	0.065	0.041	0.035	0.042	0.072	0.073
Beatys Butte, OR	0.029	0.053	0.026	0.020	0.040	0.051	0.050
Beatys Butte, OR (2010)	0.031	0.047	0.035	0.031	0.038	0.048	0.047
Big Summit, OR (2010)	0.120	0.125	0.109	0.111	0.126	0.126	0.132
Cold Spring, OR	0.034	0.055	0.029	0.022	0.046	0.050	0.051
Cold Spring, OR (2010)	0.033	0.052	0.035	0.033	0.054	0.049	0.050
Coyote Lake, OR	0.030	0.070	0.034	0.036	0.044	0.075	0.075
Coyote Lake, OR (2011)	0.029	0.058	0.025	0.026	0.033	0.062	0.060
Fishnet, OR	0.032	0.064	0.030	0.037	0.049	0.064	0.063
Hog Creek, OR	0.037	0.054	0.024	0.024	0.050	0.059	0.058
Jackies Butte, OR	0.045	0.075	0.041	0.044	0.054	0.072	0.069
Jackies Butte, OR (2011)	0.038	0.059	0.033	0.035	0.042	0.059	0.056

TABLE F-2 Continued

	Miller Mountain, NV (SWC 2010)	Montezuma Peak, NV	Nellis, NV	New Pass- Ravenswood, NV	North Stillwater, NV	Paymaster, NV (2006)	Paymaster, NV (2010)
Kiger, OR (2011)	0.044	0.071	0.038	0.041	0.054	0.064	0.063
Kiger Herd, OR (2009)	0.043	0.084	0.039	0.042	0.059	0.076	0.075
Liggett Table, OR	0.150	0.168	0.165	0.149	0.176	0.162	0.169
Murderers Creek, OR (2001)	0.069	0.094	0.079	0.075	0.093	0.095	0.099
Murderers Creek, OR (2009)	0.059	0.082	0.061	0.059	0.076	0.077	0.077
Paisley Desert, OR	0.028	0.053	0.024	0.024	0.030	0.051	0.051
Riddle Herd, OR (2009)	0.054	0.078	0.054	0.046	0.058	0.067	0.070
Riddle Mountain, OR	0.052	0.078	0.056	0.042	0.064	0.066	0.069
Riddle Mountain, OR (2011)	0.062	0.086	0.061	0.052	0.065	0.074	0.080
Sand Springs, OR (2011)	0.035	0.048	0.034	0.031	0.039	0.047	0.046
Sheepshead, OR	0.034	0.059	0.032	0.031	0.036	0.054	0.056
Sheepshead, OR (2011)	0.032	0.052	0.027	0.024	0.035	0.045	0.047
South Steens, OR	0.035	0.051	0.032	0.025	0.033	0.055	0.054
South Steens, OR (2010)	0.036	0.044	0.029	0.024	0.035	0.048	0.045
Stinkingwater, OR	0.053	0.097	0.050	0.049	0.076	0.094	0.095
Three Fingers, OR	0.044	0.063	0.039	0.050	0.059	0.052	0.059
Three Fingers, OR (2011)	0.043	0.062	0.028	0.041	0.057	0.049	0.057
Warm Springs, OR	0.034	0.056	0.026	0.019	0.045	0.050	0.050
Warm Springs, OR (2010)	0.033	0.057	0.025	0.018	0.046	0.054	0.053
Blawn Wash, UT	0.070	0.095	0.069	0.055	0.064	0.089	0.087
Cedar Mountain, UT	0.044	0.069	0.044	0.032	0.047	0.076	0.078
Cedar Ridge, UT	0.073	0.088	0.060	0.068	0.081	0.089	0.092
Cedar Ridge, UT (trap)	0.083	0.085	0.070	0.075	0.079	0.092	0.093
Cold Springs, UT (2006)	0.109	0.112	0.087	0.083	0.092	0.110	0.112
Cold Springs, UT (trap)	0.083	0.093	0.063	0.058	0.064	0.089	0.091
Delta, UT	0.032	0.054	0.026	0.028	0.041	0.051	0.053
Hill Creek, UT	0.040	0.056	0.043	0.045	0.029	0.056	0.060
Muddy Creek, UT	0.083	0.090	0.074	0.080	0.088	0.093	0.093
North Hills, UT	0.072	0.098	0.064	0.065	0.103	0.102	0.102
Range Creek, UT	0.056	0.066	0.040	0.043	0.052	0.065	0.067
Sinbad, UT	0.068	0.096	0.064	0.057	0.074	0.088	0.088
Sulphur, UT	0.091	0.125	0.086	0.093	0.109	0.125	0.122
Sulphur Herd, UT (South, 2006)	0.055	0.088	0.059	0.055	0.063	0.084	0.089

Tilley Creek, UT	0.072	0.085	0.081	0.073	0.082	0.073	0.084	0.087
Winter Ridge, UT	0.040	0.050	0.043	0.042	0.040	0.042	0.057	0.057
Adobe Town, WY	0.022	0.054	0.033	0.038	0.044	0.038	0.047	0.052
Adobe Town, WY (2011)	0.029	0.040	0.028	0.030	0.034	0.030	0.041	0.041
Antelope Hills, WY	0.047	0.083	0.039	0.037	0.059	0.037	0.084	0.084
Conant Creek, WY (Lander)	0.054	0.084	0.062	0.064	0.044	0.064	0.079	0.082
Cooper Creek, WY	0.032	0.060	0.027	0.029	0.045	0.029	0.053	0.054
Dishpan Butte, WY (Lander)	0.037	0.063	0.045	0.048	0.050	0.048	0.053	0.060
Divide Basin, WY	0.027	0.051	0.025	0.019	0.039	0.019	0.048	0.049
Divide Basin, WY (2011)	0.029	0.049	0.022	0.026	0.038	0.026	0.046	0.049
Eagles Nest, WY	0.052	0.087	0.050	0.046	0.070	0.046	0.086	0.087
Happy Creek Springs, WY	0.038	0.092	0.044	0.046	0.063	0.046	0.081	0.080
Little Colorado, WY	0.039	0.062	0.040	0.035	0.059	0.035	0.059	0.061
Little Colorado, WY (2011)	0.038	0.056	0.038	0.027	0.055	0.027	0.053	0.054
Lost Creek, WY	0.029	0.054	0.024	0.021	0.042	0.021	0.053	0.054
Lost Creek, WY (combined)	0.029	0.051	0.028	0.023	0.043	0.023	0.049	0.050
McCullough Peaks, WY	0.038	0.080	0.040	0.037	0.057	0.037	0.080	0.080
Muskat Basin, WY (Lander)	0.043	0.068	0.040	0.045	0.053	0.045	0.058	0.065
Salt Wells, WY (East)	0.024	0.045	0.025	0.029	0.031	0.029	0.048	0.047
Salt Wells, WY (West)	0.021	0.057	0.025	0.022	0.045	0.022	0.053	0.054
Stewart Creek, WY	0.040	0.076	0.036	0.027	0.049	0.027	0.073	0.074
Stewart Creek, WY (2009)	0.032	0.069	0.038	0.035	0.056	0.035	0.066	0.066
White Mountain, WY (2011)	0.041	0.044	0.042	0.039	0.050	0.039	0.047	0.044
	Pine Nut Mountain, NV	Powell Mountain, NV	Red Rock, NV	Reveille, NV	Roberts Mountain, NV	Rock Creek, NV (2002)	Rock Creek, NV (2010)	
Pine Nut Mountain, NV	0.000							
Powell Mountain, NV	0.099	0.000						
Red Rock, NV	0.068	0.081	0.000					
Reveille, NV	0.071	0.073	0.053	0.000				
Roberts Mountain, NV	0.071	0.062	0.040	0.046	0.000			
Rock Creek, NV (2002)	0.072	0.089	0.077	0.089	0.069	0.000		
Rock Creek, NV (2010)	0.062	0.069	0.055	0.066	0.052	0.013	0.000	
Rocky Hills, NV	0.063	0.065	0.042	0.051	0.037	0.056	0.042	
Rodeo Creek, NV	0.057	0.051	0.038	0.043	0.035	0.057	0.042	
Saulsburry, NV	0.054	0.056	0.045	0.040	0.045	0.058	0.039	

continued

TABLE F-2 Continued

	Pine Nut Mountain, NV	Powell Mountain, NV	Red Rock, NV	Reveille, NV	Roberts Mountain, NV	Rock Creek, NV (2002)	Rock Creek, NV (2010)
Sand Springs East, NV	0.058	0.058	0.041	0.033	0.034	0.054	0.035
Seven Mile, NV	0.068	0.081	0.045	0.063	0.056	0.069	0.053
Shawave Mountains, NV	0.065	0.062	0.044	0.056	0.043	0.065	0.049
Silver Peak, NV	0.062	0.088	0.069	0.060	0.053	0.072	0.058
Snowstorm, NV (Castle Ridge)	0.081	0.068	0.067	0.057	0.054	0.048	0.036
Snowstorm, NV (Dryhill)	0.096	0.125	0.082	0.089	0.084	0.118	0.095
South Shoshone, NV	0.057	0.069	0.038	0.049	0.035	0.059	0.038
Spruce-Peupop, NV (2011)	0.081	0.078	0.051	0.065	0.058	0.099	0.074
Stillwater, NV	0.069	0.078	0.060	0.061	0.051	0.083	0.067
Stone Cabin, NV	0.056	0.060	0.038	0.033	0.026	0.055	0.040
Warm Springs, NV	0.072	0.083	0.056	0.054	0.044	0.073	0.059
Warm Springs Canyon, NV	0.063	0.077	0.044	0.042	0.037	0.067	0.051
Wheeler Pass, NV	0.085	0.096	0.051	0.072	0.061	0.077	0.056
Wheeler Pass, NV (2007)	0.054	0.052	0.034	0.047	0.036	0.061	0.043
Alvord Tule, OR	0.069	0.062	0.061	0.057	0.045	0.071	0.056
Beatys Butte, OR	0.057	0.049	0.042	0.042	0.034	0.060	0.043
Beatys Butte, OR (2010)	0.068	0.062	0.049	0.049	0.039	0.069	0.052
Big Summit, OR (2010)	0.144	0.138	0.133	0.130	0.119	0.130	0.109
Cold Spring, OR	0.058	0.070	0.044	0.053	0.039	0.061	0.048
Cold Spring, OR (2010)	0.069	0.079	0.050	0.056	0.052	0.073	0.058
Coyote Lake, OR	0.065	0.068	0.060	0.050	0.044	0.066	0.051
Coyote Lake, OR (2011)	0.054	0.049	0.055	0.043	0.037	0.060	0.043
Fishnet, OR	0.068	0.083	0.060	0.051	0.048	0.076	0.063
Hog Creek, OR	0.055	0.072	0.047	0.035	0.042	0.066	0.055
Jackies Butte, OR	0.068	0.046	0.054	0.055	0.050	0.082	0.058
Jackies Butte, OR (2011)	0.060	0.057	0.039	0.050	0.046	0.069	0.052
Kiger, OR (2011)	0.066	0.072	0.056	0.062	0.059	0.067	0.054
Kiger Herd, OR (2009)	0.067	0.076	0.062	0.057	0.052	0.073	0.060
Liggett Table, OR	0.206	0.236	0.190	0.191	0.170	0.186	0.186
Murderers Creek, OR (2001)	0.127	0.120	0.097	0.107	0.091	0.095	0.088
Murderers Creek, OR (2009)	0.104	0.088	0.084	0.092	0.070	0.090	0.078
Paisley Desert, OR	0.048	0.051	0.033	0.034	0.026	0.062	0.041
Riddle Herd, OR (2009)	0.078	0.090	0.069	0.074	0.072	0.066	0.060
Riddle Mountain, OR	0.076	0.086	0.067	0.075	0.075	0.061	0.054

continued

Riddle Mountain, OR (2011)	0.083	0.098	0.074	0.080	0.076	0.086	0.064
Sand Springs, OR (2011)	0.057	0.060	0.056	0.050	0.043	0.069	0.056
Sheepshead, OR	0.057	0.055	0.042	0.056	0.035	0.062	0.048
Sheepshead, OR (2011)	0.047	0.055	0.039	0.046	0.038	0.055	0.042
South Steens, OR	0.057	0.062	0.043	0.048	0.035	0.056	0.042
South Steens, OR (2010)	0.053	0.058	0.042	0.044	0.038	0.060	0.048
Stinkingwater, OR	0.092	0.090	0.075	0.071	0.059	0.087	0.075
Three Fingers, OR	0.075	0.074	0.062	0.064	0.045	0.081	0.066
Three Fingers, OR (2011)	0.069	0.070	0.048	0.058	0.037	0.066	0.049
Warm Springs, OR	0.054	0.059	0.040	0.047	0.033	0.042	0.029
Warm Springs, OR (2010)	0.055	0.060	0.042	0.045	0.034	0.049	0.032
Blawn Wash, UT	0.087	0.075	0.075	0.082	0.076	0.086	0.077
Cedar Mountain, UT	0.060	0.089	0.056	0.056	0.058	0.078	0.063
Cedar Ridge, UT	0.105	0.100	0.105	0.096	0.091	0.078	0.067
Cedar Ridge, UT (trap)	0.112	0.107	0.107	0.100	0.099	0.085	0.076
Cold Springs, UT (2006)	0.116	0.159	0.112	0.117	0.101	0.130	0.122
Cold Springs, UT (trap)	0.089	0.111	0.077	0.084	0.077	0.101	0.089
Delta, UT	0.047	0.056	0.035	0.044	0.036	0.049	0.035
Hill Creek, UT	0.074	0.071	0.046	0.057	0.040	0.075	0.058
Muddy Creek, UT	0.104	0.123	0.068	0.083	0.091	0.125	0.106
North Hills, UT	0.105	0.108	0.070	0.087	0.075	0.092	0.069
Range Creek, UT	0.077	0.091	0.076	0.072	0.062	0.068	0.059
Sinbad, UT	0.064	0.087	0.085	0.080	0.078	0.093	0.084
Sulphur, UT	0.119	0.105	0.105	0.103	0.085	0.126	0.099
Sulphur Herd, UT (South, 2006)	0.082	0.097	0.069	0.084	0.071	0.072	0.060
Tilley Creek, UT	0.111	0.094	0.086	0.101	0.092	0.073	0.069
Winter Ridge, UT	0.074	0.070	0.052	0.066	0.046	0.073	0.055
Adobe Town, WY	0.064	0.057	0.044	0.040	0.039	0.060	0.043
Adobe Town, WY (2011)	0.068	0.064	0.036	0.042	0.035	0.069	0.050
Antelope Hills, WY	0.058	0.075	0.063	0.047	0.052	0.075	0.058
Conant Creek, WY (Lander)	0.088	0.074	0.082	0.080	0.055	0.082	0.075
Cooper Creek, WY	0.047	0.058	0.040	0.039	0.033	0.058	0.040
Dishpan Butte, WY (Lander)	0.066	0.077	0.061	0.065	0.051	0.056	0.046
Divide Basin, WY	0.053	0.062	0.041	0.045	0.042	0.042	0.028
Divide Basin, WY (2011)	0.052	0.059	0.038	0.045	0.037	0.042	0.026
Eagles Nest, WY	0.089	0.097	0.076	0.067	0.053	0.078	0.060
Happy Creek Springs, WY	0.081	0.091	0.081	0.066	0.051	0.082	0.068

continued

Beatsys Butte, OR (2010)	0.044	0.029	0.036	0.035	0.049	0.020	0.045
Big Summit, OR (2010)	0.105	0.089	0.102	0.115	0.125	0.099	0.113
Cold Spring, OR	0.034	0.036	0.033	0.043	0.048	0.038	0.035
Cold Spring, OR (2010)	0.038	0.040	0.044	0.051	0.054	0.045	0.038
Coyote Lake, OR	0.047	0.039	0.040	0.041	0.056	0.049	0.043
Coyote Lake, OR (2011)	0.040	0.029	0.034	0.029	0.052	0.037	0.037
Fishnet, OR	0.041	0.048	0.047	0.049	0.065	0.054	0.045
Hog Creek, OR	0.039	0.034	0.037	0.040	0.056	0.043	0.046
Jackies Butte, OR	0.043	0.044	0.043	0.050	0.056	0.053	0.063
Jackies Butte, OR (2011)	0.037	0.035	0.037	0.039	0.045	0.039	0.053
Kiger, OR (2011)	0.047	0.038	0.038	0.045	0.058	0.038	0.042
Kiger Herd, OR (2009)	0.056	0.043	0.046	0.046	0.067	0.044	0.040
Liggett Table, OR	0.163	0.166	0.175	0.156	0.189	0.165	0.142
Murderers Creek, OR (2001)	0.087	0.072	0.075	0.083	0.087	0.074	0.083
Murderers Creek, OR (2009)	0.067	0.058	0.054	0.066	0.068	0.062	0.064
Paisley Desert, OR	0.033	0.019	0.030	0.024	0.042	0.031	0.035
Riddle Herd, OR (2009)	0.060	0.049	0.046	0.049	0.074	0.049	0.051
Riddle Mountain, OR	0.051	0.049	0.043	0.048	0.066	0.048	0.053
Riddle Mountain, OR (2011)	0.067	0.054	0.052	0.056	0.079	0.057	0.056
Sand Springs, OR (2011)	0.043	0.033	0.037	0.036	0.054	0.035	0.037
Sheepshead, OR	0.036	0.029	0.032	0.038	0.036	0.033	0.043
Sheepshead, OR (2011)	0.028	0.026	0.028	0.034	0.038	0.033	0.041
South Steens, OR	0.043	0.030	0.036	0.036	0.043	0.036	0.041
South Steens, OR (2010)	0.042	0.028	0.033	0.034	0.041	0.032	0.046
Stinkingwater, OR	0.058	0.066	0.067	0.056	0.077	0.070	0.086
Three Fingers, OR	0.041	0.043	0.053	0.043	0.054	0.055	0.055
Three Fingers, OR (2011)	0.035	0.044	0.047	0.033	0.047	0.050	0.054
Warm Springs, OR	0.029	0.034	0.025	0.027	0.036	0.035	0.043
Warm Springs, OR (2010)	0.031	0.034	0.025	0.029	0.040	0.038	0.037
Blawn Wash, UT	0.063	0.060	0.057	0.070	0.081	0.085	0.077
Cedar Mountain, UT	0.056	0.041	0.038	0.052	0.056	0.051	0.041
Cedar Ridge, UT	0.071	0.062	0.066	0.073	0.081	0.071	0.072
Cedar Ridge, UT (trap)	0.085	0.061	0.075	0.089	0.096	0.069	0.082
Cold Springs, UT (2006)	0.108	0.099	0.090	0.086	0.111	0.099	0.111
Cold Springs, UT (trap)	0.086	0.066	0.064	0.058	0.087	0.073	0.086
Delta, UT	0.040	0.020	0.028	0.029	0.042	0.024	0.041
Hill Creek, UT	0.053	0.025	0.045	0.044	0.059	0.034	0.051

TABLE F-2 Continued

	Rocky Hills, NV	Rodeo Creek, NV	Saulsbury, NV	Sand Springs East, NV	Seven Mile, NV	Shawave Mountains, NV	Silver Peak, NV
Muddy Creek, UT	0.088	0.075	0.073	0.083	0.081	0.087	0.101
North Hills, UT	0.062	0.063	0.066	0.070	0.073	0.063	0.080
Range Creek, UT	0.056	0.046	0.045	0.046	0.062	0.051	0.057
Sinbad, UT	0.073	0.061	0.056	0.062	0.076	0.060	0.082
Sulphur, UT	0.093	0.085	0.085	0.096	0.101	0.095	0.104
Sulphur Herd, UT (South, 2006)	0.067	0.053	0.064	0.057	0.068	0.049	0.051
Tilley Creek, UT	0.061	0.068	0.077	0.081	0.078	0.076	0.070
Winter Ridge, UT	0.044	0.030	0.044	0.051	0.055	0.032	0.048
Adobe Town, WY	0.038	0.029	0.042	0.033	0.048	0.031	0.047
Adobe Town, WY (2011)	0.035	0.027	0.038	0.034	0.041	0.024	0.046
Antelope Hills, WY	0.049	0.044	0.044	0.038	0.054	0.046	0.058
Conant Creek, WY (Lander)	0.074	0.052	0.066	0.062	0.090	0.066	0.058
Cooper Creek, WY	0.039	0.029	0.029	0.030	0.047	0.034	0.042
Dishpan Butte, WY (Lander)	0.054	0.039	0.054	0.035	0.063	0.044	0.042
Divide Basin, WY	0.033	0.023	0.021	0.029	0.035	0.024	0.033
Divide Basin, WY (2011)	0.032	0.021	0.022	0.029	0.037	0.026	0.039
Eagles Nest, WY	0.060	0.051	0.062	0.055	0.074	0.062	0.053
Happy Creek Springs, WY	0.048	0.055	0.053	0.059	0.072	0.060	0.055
Little Colorado, WY	0.035	0.036	0.043	0.041	0.051	0.046	0.045
Little Colorado, WY (2011)	0.032	0.035	0.039	0.036	0.048	0.042	0.043
Lost Creek, WY	0.034	0.025	0.029	0.032	0.047	0.033	0.038
Lost Creek, WY (combined)	0.036	0.028	0.032	0.034	0.045	0.035	0.037
McCullough Peaks, WY	0.046	0.047	0.051	0.043	0.066	0.051	0.051
Muskkrat Basin, WY (Lander)	0.060	0.041	0.055	0.036	0.066	0.049	0.040
Salt Wells, WY (East)	0.029	0.020	0.026	0.034	0.035	0.032	0.042
Salt Wells, WY (West)	0.030	0.031	0.029	0.037	0.048	0.034	0.037
Stewart Creek, WY	0.046	0.036	0.040	0.037	0.056	0.044	0.045
Stewart Creek, WY (2009)	0.048	0.037	0.036	0.045	0.057	0.040	0.049
White Mountain, WY (2011)	0.044	0.033	0.036	0.047	0.056	0.038	0.054

	Snowstorm, NV (Castle Ridge)	Snowstorm, NV (Dryhill)	South Shoshone, NV	Spruce-Pequop, NV (2011)	Stillwater, NV	Stone Cabin, NV	Warm Springs, NV
Snowstorm, NV (Castle Ridge)	0.000						
Snowstorm, NV (Dryhill)	0.082	0.000					
South Shoshone, NV	0.041	0.075	0.000				
Spruce-Pequop, NV (2011)	0.075	0.094	0.053	0.000			
Stillwater, NV	0.065	0.072	0.045	0.059	0.000		
Stone Cabin, NV	0.039	0.079	0.030	0.052	0.044		
Warm Springs, NV	0.054	0.072	0.043	0.067	0.055	0.000	0.000
Warm Springs Canyon, NV	0.052	0.072	0.037	0.047	0.040	0.029	0.014
Wheeler Pass, NV	0.083	0.125	0.066	0.064	0.082	0.058	0.074
Wheeler Pass, NV (2007)	0.042	0.090	0.028	0.046	0.052	0.032	0.044
Alvord Tule, OR	0.057	0.080	0.042	0.056	0.056	0.041	0.044
Beatys Butte, OR	0.039	0.070	0.032	0.046	0.045	0.025	0.033
Beatys Butte, OR (2010)	0.042	0.064	0.035	0.050	0.042	0.032	0.035
Big Summit, OR (2010)	0.109	0.146	0.118	0.135	0.129	0.109	0.139
Cold Spring, OR	0.050	0.076	0.032	0.045	0.043	0.033	0.050
Cold Spring, OR (2010)	0.057	0.081	0.039	0.054	0.050	0.043	0.056
Coyote Lake, OR	0.057	0.088	0.039	0.058	0.060	0.036	0.053
Coyote Lake, OR (2011)	0.043	0.068	0.030	0.048	0.046	0.031	0.043
Fishnet, OR	0.049	0.073	0.037	0.067	0.057	0.041	0.044
Hog Creek, OR	0.054	0.067	0.035	0.056	0.055	0.031	0.048
Jackies Butte, OR	0.061	0.074	0.049	0.067	0.069	0.048	0.055
Jackies Butte, OR (2011)	0.056	0.060	0.039	0.059	0.054	0.039	0.039
Kiger, OR (2011)	0.055	0.089	0.049	0.082	0.067	0.038	0.044
Kiger Herd, OR (2009)	0.068	0.087	0.053	0.086	0.073	0.043	0.040
Liggett Table, OR	0.184	0.196	0.159	0.194	0.167	0.174	0.129
Murderers Creek, OR (2001)	0.090	0.134	0.077	0.110	0.092	0.076	0.090
Murderers Creek, OR (2009)	0.073	0.126	0.063	0.095	0.079	0.057	0.078
Paisley Desert, OR	0.042	0.062	0.024	0.040	0.038	0.021	0.039
Riddle Herd, OR (2009)	0.063	0.100	0.056	0.097	0.066	0.051	0.041
Riddle Mountain, OR	0.058	0.107	0.052	0.089	0.070	0.050	0.045
Riddle Mountain, OR (2011)	0.069	0.108	0.057	0.103	0.073	0.052	0.050
Sand Springs, OR (2011)	0.041	0.076	0.036	0.058	0.049	0.037	0.049
Sheepshead, OR	0.047	0.084	0.030	0.053	0.047	0.026	0.051
Sheepshead, OR (2011)	0.037	0.080	0.026	0.051	0.040	0.026	0.047

continued

TABLE F-2 Continued

	Snowstorm, NV (Castle Ridge)	Snowstorm, NV (Dryhill)	South Shoshone, NV	Spruce-Pequop, NV (2011)	Stillwater, NV	Stone Cabin, NV	Warm Springs, NV
South Steens, OR	0.050	0.059	0.029	0.045	0.041	0.028	0.042
South Steens, OR (2010)	0.049	0.055	0.035	0.044	0.041	0.029	0.040
Stinkingwater, OR	0.078	0.098	0.055	0.080	0.085	0.068	0.059
Three Fingers, OR	0.052	0.096	0.043	0.082	0.065	0.045	0.053
Three Fingers, OR (2011)	0.047	0.082	0.030	0.071	0.057	0.034	0.047
Warm Springs, OR	0.041	0.068	0.027	0.046	0.047	0.024	0.038
Warm Springs, OR (2010)	0.042	0.065	0.029	0.048	0.048	0.022	0.034
Blawn Wash, UT	0.076	0.113	0.066	0.089	0.079	0.060	0.065
Cedar Mountain, UT	0.064	0.074	0.043	0.059	0.053	0.040	0.052
Cedar Ridge, UT	0.062	0.113	0.066	0.109	0.093	0.062	0.086
Cedar Ridge, UT (trap)	0.075	0.110	0.078	0.109	0.090	0.071	0.096
Cold Springs, UT (2006)	0.123	0.123	0.088	0.126	0.097	0.096	0.084
Cold Springs, UT (trap)	0.095	0.102	0.059	0.093	0.072	0.067	0.063
Delta, UT	0.042	0.079	0.031	0.049	0.046	0.022	0.045
Hill Creek, UT	0.056	0.079	0.040	0.063	0.040	0.034	0.054
Muddy Creek, UT	0.089	0.117	0.079	0.085	0.104	0.081	0.108
North Hills, UT	0.080	0.115	0.074	0.095	0.107	0.061	0.089
Range Creek, UT	0.057	0.084	0.044	0.083	0.062	0.045	0.052
Sinbad, UT	0.082	0.124	0.069	0.087	0.079	0.060	0.083
Sulphur, UT	0.093	0.145	0.096	0.120	0.117	0.079	0.115
Sulphur Herd, UT (South, 2006)	0.070	0.094	0.058	0.088	0.065	0.060	0.068
Tilley Creek, UT	0.056	0.120	0.070	0.110	0.093	0.074	0.084
Winter Ridge, UT	0.053	0.077	0.040	0.057	0.053	0.045	0.048
Adobe Town, WY	0.043	0.081	0.035	0.050	0.045	0.034	0.053
Adobe Town, WY (2011)	0.040	0.055	0.029	0.042	0.036	0.031	0.043
Antelope Hills, WY	0.058	0.084	0.051	0.076	0.070	0.044	0.054
Conant Creek, WY (Lander)	0.065	0.105	0.061	0.094	0.057	0.056	0.062
Cooper Creek, WY	0.042	0.079	0.035	0.060	0.053	0.026	0.047
Dishpan Butte, WY (Lander)	0.048	0.098	0.043	0.074	0.054	0.048	0.051
Divide Basin, WY	0.030	0.067	0.026	0.044	0.048	0.024	0.036
Divide Basin, WY (2011)	0.031	0.071	0.030	0.048	0.046	0.020	0.042
Eagles Nest, WY	0.056	0.098	0.047	0.080	0.072	0.056	0.063
Happy Creek Springs, WY	0.068	0.113	0.051	0.086	0.080	0.050	0.063
Little Colorado, WY	0.049	0.089	0.037	0.064	0.064	0.038	0.042

	Warm Springs Canyon, NV	Wheeler Pass, NV	Wheeler Pass, NV (2007)	Alvord Tule, OR	Beatys Butte, OR	Beatys Butte, OR (2010)	Big Summit, OR (2010)
Little Colorado, WY (2011)	0.044	0.080	0.032	0.060	0.061	0.038	0.037
Lost Creek, WY	0.042	0.074	0.028	0.050	0.048	0.027	0.037
Lost Creek, WY (combined)	0.045	0.070	0.027	0.053	0.050	0.030	0.039
McCullough Peaks, WY	0.046	0.082	0.041	0.077	0.069	0.040	0.039
Muskrat Basin, WY (Lander)	0.045	0.100	0.043	0.068	0.051	0.042	0.049
Salt Wells, WY (East)	0.038	0.070	0.028	0.041	0.036	0.022	0.041
Salt Wells, WY (West)	0.036	0.074	0.035	0.052	0.051	0.027	0.047
Stewart Creek, WY	0.050	0.081	0.036	0.068	0.058	0.037	0.045
Stewart Creek, WY (2009)	0.058	0.091	0.039	0.062	0.067	0.038	0.045
White Mountain, WY (2011)	0.046	0.076	0.041	0.063	0.060	0.047	0.042
	Warm Springs Canyon, NV	Wheeler Pass, NV	Wheeler Pass, NV (2007)	Alvord Tule, OR	Beatys Butte, OR	Beatys Butte, OR (2010)	Big Summit, OR (2010)
Warm Springs Canyon, NV	0.000						
Wheeler Pass, NV	0.061	0.000					
Wheeler Pass, NV (2007)	0.036	0.040	0.000				
Alvord Tule, OR	0.037	0.073	0.043	0.000			
Beatys Butte, OR	0.029	0.063	0.027	0.040	0.000	0.000	0.000
Beatys Butte, OR (2010)	0.029	0.074	0.036	0.046	0.018	0.039	0.115
Big Summit, OR (2010)	0.123	0.130	0.109	0.115	0.099	0.107	0.112
Cold Spring, OR	0.032	0.067	0.036	0.045	0.030	0.044	0.124
Cold Spring, OR (2010)	0.040	0.071	0.041	0.055	0.038	0.047	0.107
Coyote Lake, OR	0.043	0.068	0.042	0.021	0.039	0.035	0.148
Coyote Lake, OR (2011)	0.036	0.067	0.033	0.018	0.028	0.047	0.115
Fishnet, OR	0.043	0.088	0.051	0.052	0.041	0.051	0.111
Hog Creek, OR	0.039	0.071	0.045	0.039	0.036	0.038	0.125
Jackies Butte, OR	0.049	0.073	0.044	0.044	0.039	0.051	0.117
Jackies Butte, OR (2011)	0.033	0.062	0.036	0.038	0.034	0.040	0.128
Kiger, OR (2011)	0.048	0.091	0.049	0.054	0.028	0.039	0.275
Kiger Herd, OR (2009)	0.047	0.082	0.050	0.047	0.031	0.044	0.160
Liggett Table, OR	0.131	0.199	0.178	0.171	0.143	0.151	0.151
Murderers Creek, OR (2001)	0.078	0.114	0.089	0.100	0.078	0.073	0.098
Murderers Creek, OR (2009)	0.065	0.105	0.074	0.084	0.060	0.062	0.143
Paisley Desert, OR	0.029	0.048	0.024	0.031	0.018	0.028	0.137
Riddle Herd, OR (2009)	0.049	0.096	0.059	0.065	0.039	0.048	
Riddle Mountain, OR	0.048	0.094	0.055	0.063	0.036	0.045	

continued

TABLE F-2 Continued

	Warm Springs Canyon, NV	Wheeler Pass, NV	Wheeler Pass, NV (2007)	Alvord Tule, OR	Beatys Butte, OR	Beatys Butte, OR (2010)	Big Summit, OR (2010)
Riddle Mountain, OR (2011)	0.057	0.105	0.066	0.067	0.046	0.055	0.147
Sand Springs, OR (2011)	0.038	0.075	0.035	0.033	0.035	0.031	0.104
Sheepshead, OR	0.035	0.061	0.029	0.034	0.030	0.032	0.115
Sheepshead, OR (2011)	0.034	0.058	0.023	0.036	0.031	0.035	0.111
South Steens, OR	0.028	0.058	0.034	0.022	0.033	0.032	0.118
South Steens, OR (2010)	0.030	0.063	0.035	0.030	0.027	0.027	0.121
Stinkingwater, OR	0.054	0.092	0.057	0.056	0.052	0.060	0.162
Three Fingers, OR	0.053	0.089	0.046	0.059	0.042	0.050	0.130
Three Fingers, OR (2011)	0.046	0.073	0.039	0.052	0.041	0.048	0.127
Warm Springs, OR	0.028	0.064	0.035	0.042	0.032	0.032	0.106
Warm Springs, OR (2010)	0.027	0.067	0.037	0.043	0.022	0.032	0.107
Blawn Wash, UT	0.066	0.096	0.065	0.077	0.053	0.069	0.167
Cedar Mountain, UT	0.041	0.065	0.050	0.045	0.037	0.046	0.122
Cedar Ridge, UT	0.078	0.120	0.073	0.067	0.069	0.073	0.125
Cedar Ridge, UT (trap)	0.084	0.116	0.077	0.069	0.078	0.076	0.109
Cold Springs, UT (2006)	0.075	0.153	0.105	0.100	0.099	0.093	0.207
Cold Springs, UT (trap)	0.053	0.111	0.073	0.069	0.073	0.070	0.166
Delta, UT	0.036	0.055	0.025	0.034	0.022	0.032	0.090
Hill Creek, UT	0.043	0.054	0.034	0.046	0.037	0.035	0.110
Muddy Creek, UT	0.086	0.111	0.079	0.083	0.084	0.093	0.156
North Hills, UT	0.075	0.088	0.071	0.083	0.052	0.064	0.109
Range Creek, UT	0.044	0.101	0.055	0.049	0.050	0.049	0.126
Simbad, UT	0.065	0.107	0.061	0.076	0.064	0.065	0.133
Sulphur, UT	0.107	0.129	0.089	0.107	0.076	0.090	0.138
Sulphur Herd, UT (South, 2006)	0.061	0.071	0.061	0.059	0.056	0.061	0.119
Tilley Creek, UT	0.085	0.110	0.069	0.098	0.057	0.071	0.134
Winter Ridge, UT	0.044	0.058	0.035	0.054	0.036	0.028	0.103
Adobe Town, WY	0.040	0.062	0.033	0.046	0.030	0.028	0.107
Adobe Town, WY (2011)	0.031	0.067	0.032	0.043	0.026	0.020	0.106
Antelope Hills, WY	0.042	0.080	0.050	0.048	0.036	0.044	0.120
Conant Creek, WY (Lander)	0.064	0.100	0.061	0.080	0.057	0.062	0.137
Cooper Creek, WY	0.039	0.056	0.031	0.043	0.027	0.035	0.100
Dishpan Butte, WY (Lander)	0.047	0.066	0.039	0.050	0.045	0.046	0.123
Divide Basin, WY	0.025	0.055	0.026	0.036	0.020	0.025	0.095

	Cold Spring, OR	Cold Spring, OR (2010)	Coyote Lake, OR	Coyote Lake, OR (2011)	Fishnet, OR	Hog Creek, OR	Jackies Butte, OR
Divide Basin, WY (2011)	0.029	0.056	0.026	0.042	0.022	0.028	0.087
Eagles Nest, WY	0.057	0.086	0.059	0.056	0.055	0.060	0.118
Happy Creek Springs, WY	0.051	0.077	0.051	0.064	0.056	0.053	0.120
Little Colorado, WY	0.034	0.056	0.033	0.047	0.035	0.037	0.111
Little Colorado, WY (2011)	0.032	0.054	0.031	0.046	0.029	0.031	0.114
Lost Creek, WY	0.031	0.052	0.031	0.031	0.030	0.031	0.093
Lost Creek, WY (combined)	0.032	0.055	0.032	0.036	0.035	0.035	0.097
McCullough Peaks, WY	0.040	0.079	0.043	0.048	0.043	0.038	0.132
Muskkrat Basin, WY (Lander)	0.047	0.065	0.038	0.049	0.044	0.051	0.126
Salt Wells, WY (East)	0.025	0.060	0.027	0.031	0.025	0.024	0.101
Salt Wells, WY (West)	0.038	0.068	0.031	0.051	0.027	0.035	0.106
Stewart Creek, WY	0.042	0.069	0.041	0.029	0.038	0.043	0.111
Stewart Creek, WY (2009)	0.039	0.077	0.045	0.046	0.045	0.037	0.113
White Mountain, WY (2011)	0.042	0.086	0.040	0.051	0.032	0.029	0.112
Cold Spring, OR	0.000						
Cold Spring, OR (2010)	0.011	0.000					
Coyote Lake, OR	0.036	0.048	0.000				
Coyote Lake, OR (2011)	0.032	0.040	0.010	0.000			
Fishnet, OR	0.047	0.054	0.047	0.040	0.000		
Hog Creek, OR	0.034	0.035	0.042	0.033	0.041	0.000	
Jackies Butte, OR	0.050	0.058	0.055	0.039	0.060	0.051	0.000
Jackies Butte, OR (2011)	0.044	0.052	0.048	0.034	0.047	0.041	0.011
Kiger, OR (2011)	0.055	0.062	0.059	0.048	0.040	0.047	0.063
Kiger Herd, OR (2009)	0.054	0.060	0.051	0.043	0.047	0.045	0.059
Liggett Table, OR	0.145	0.150	0.162	0.154	0.165	0.165	0.183
Murderers Creek, OR (2001)	0.068	0.069	0.088	0.085	0.084	0.078	0.115
Murderers Creek, OR (2009)	0.052	0.060	0.073	0.067	0.069	0.071	0.087
Paisley Desert, OR	0.029	0.036	0.028	0.018	0.037	0.031	0.032
Riddle Herd, OR (2009)	0.064	0.074	0.070	0.056	0.055	0.058	0.082
Riddle Mountain, OR	0.058	0.068	0.069	0.056	0.056	0.059	0.078
Riddle Mountain, OR (2011)	0.070	0.081	0.073	0.063	0.059	0.061	0.091
Sand Springs, OR (2011)	0.038	0.042	0.035	0.024	0.041	0.031	0.056
Sheepshead, OR	0.027	0.040	0.030	0.027	0.050	0.038	0.049

continued

TABLE F-2 Continued

	Cold Spring, OR	Cold Spring, OR (2010)	Coyote Lake, OR	Coyote Lake, OR (2011)	Fishnet, OR	Hog Creek, OR	Jackies Butte, OR
Sheepshead, OR (2011)	0.019	0.028	0.033	0.027	0.044	0.035	0.050
South Steens, OR	0.033	0.045	0.027	0.023	0.044	0.031	0.044
South Steens, OR (2010)	0.039	0.050	0.037	0.029	0.043	0.027	0.038
Stinkingwater, OR	0.054	0.065	0.056	0.054	0.053	0.059	0.057
Three Fingers, OR	0.050	0.056	0.059	0.045	0.046	0.062	0.058
Three Fingers, OR (2011)	0.037	0.044	0.052	0.037	0.041	0.051	0.052
Warm Springs, OR	0.023	0.037	0.042	0.031	0.039	0.036	0.034
Warm Springs, OR (2010)	0.025	0.037	0.042	0.030	0.038	0.034	0.036
Blawn Wash, UT	0.074	0.088	0.079	0.073	0.073	0.069	0.061
Cedar Mountain, UT	0.042	0.050	0.044	0.039	0.053	0.041	0.064
Cedar Ridge, UT	0.067	0.068	0.068	0.051	0.079	0.070	0.090
Cedar Ridge, UT (trap)	0.076	0.074	0.078	0.061	0.087	0.069	0.099
Cold Springs, UT (2006)	0.090	0.107	0.106	0.096	0.094	0.105	0.120
Cold Springs, UT (trap)	0.065	0.080	0.075	0.065	0.073	0.067	0.089
Delta, UT	0.030	0.035	0.037	0.027	0.049	0.029	0.050
Hill Creek, UT	0.055	0.059	0.046	0.040	0.054	0.046	0.060
Muddy Creek, UT	0.075	0.082	0.078	0.082	0.101	0.081	0.080
North Hills, UT	0.062	0.069	0.073	0.069	0.089	0.066	0.091
Range Creek, UT	0.045	0.053	0.052	0.039	0.053	0.053	0.070
Simbad, UT	0.074	0.078	0.080	0.064	0.090	0.068	0.089
Sulphur, UT	0.096	0.112	0.091	0.084	0.119	0.109	0.098
Sulphur Herd, UT (South, 2006)	0.054	0.063	0.050	0.050	0.078	0.072	0.076
Tilley Creek, UT	0.074	0.075	0.091	0.083	0.078	0.086	0.096
Winter Ridge, UT	0.045	0.043	0.051	0.041	0.057	0.046	0.057
Adobe Town, WY	0.034	0.034	0.039	0.031	0.047	0.036	0.043
Adobe Town, WY (2011)	0.034	0.035	0.048	0.034	0.042	0.032	0.038
Antelope Hills, WY	0.056	0.066	0.053	0.038	0.061	0.049	0.053
Conant Creek, WY (Lander)	0.068	0.084	0.074	0.064	0.067	0.078	0.082
Cooper Creek, WY	0.037	0.047	0.034	0.026	0.051	0.037	0.043
Dishpan Butte, WY (Lander)	0.041	0.044	0.046	0.038	0.061	0.056	0.069
Divide Basin, WY	0.025	0.031	0.034	0.027	0.044	0.036	0.045
Divide Basin, WY (2011)	0.029	0.035	0.039	0.031	0.046	0.040	0.046
Eagles Nest, WY	0.053	0.056	0.055	0.045	0.074	0.059	0.076
Happy Creek Springs, WY	0.051	0.054	0.047	0.045	0.051	0.061	0.067

Little Colorado, WY	0.033	0.037	0.046	0.040	0.055	0.045	0.057
Little Colorado, WY (2011)	0.030	0.037	0.043	0.036	0.046	0.038	0.054
Lost Creek, WY	0.031	0.036	0.033	0.025	0.048	0.032	0.045
Lost Creek, WY (combined)	0.031	0.032	0.036	0.028	0.051	0.034	0.050
McCullough Peaks, WY	0.053	0.062	0.046	0.039	0.040	0.044	0.066
Muskrat Basin, WY (Lander)	0.038	0.043	0.042	0.034	0.061	0.058	0.075
Salt Wells, WY (East)	0.028	0.034	0.035	0.028	0.042	0.030	0.030
Salt Wells, WY (West)	0.031	0.032	0.043	0.035	0.039	0.034	0.050
Stewart Creek, WY	0.042	0.053	0.031	0.025	0.054	0.046	0.057
Stewart Creek, WY (2009)	0.042	0.041	0.041	0.038	0.059	0.047	0.062
White Mountain, WY (2011)	0.049	0.050	0.054	0.043	0.047	0.041	0.053
Jackies Butte, OR (2011)							
Jackies Butte, OR (2011)	0.000						
Kiger, OR (2011)	0.050	0.000					
Kiger Herd, OR (2009)	0.046	0.012	0.000				
Liggett Table, OR	0.160	0.176	0.177	0.000	0.000		
Murderers Creek, OR (2001)	0.097	0.081	0.086	0.192	0.000		
Murderers Creek, OR (2009)	0.078	0.063	0.070	0.187	0.018	0.000	0.000
Paisley Desert, OR	0.027	0.039	0.037	0.157	0.078	0.060	0.060
Riddle Herd, OR (2009)	0.060	0.017	0.027	0.146	0.086	0.075	0.053
Riddle Mountain, OR	0.057	0.019	0.034	0.148	0.084	0.073	0.053
Riddle Mountain, OR (2011)	0.068	0.021	0.030	0.161	0.091	0.082	0.056
Sand Springs, OR (2011)	0.044	0.046	0.049	0.171	0.080	0.063	0.027
Sheepshead, OR	0.040	0.042	0.046	0.169	0.067	0.049	0.023
Sheepshead, OR (2011)	0.040	0.044	0.049	0.167	0.070	0.054	0.023
South Steens, OR	0.033	0.047	0.046	0.159	0.087	0.072	0.020
South Steens, OR (2010)	0.029	0.043	0.044	0.157	0.092	0.074	0.024
Stinkingwater, OR	0.052	0.082	0.072	0.157	0.100	0.094	0.055
Three Fingers, OR	0.053	0.053	0.063	0.155	0.081	0.065	0.042
Three Fingers, OR (2011)	0.045	0.055	0.061	0.149	0.079	0.065	0.035
Warm Springs, OR	0.028	0.044	0.045	0.152	0.073	0.055	0.024
Warm Springs, OR (2010)	0.031	0.043	0.044	0.148	0.074	0.056	0.023
Blawn Wash, UT	0.054	0.076	0.084	0.200	0.142	0.120	0.061

continued

TABLE F-2 Continued

	Jackies Butte, OR (2011)	Kiger, OR (2011)	Kiger Herd, OR (2009)	Liggett Table, OR	Murderers Creek, OR (2001)	Murderers Creek, OR (2009)	Paisley Desert, OR
Cedar Mountain, UT	0.050	0.060	0.059	0.151	0.092	0.082	0.034
Cedar Ridge, UT	0.076	0.070	0.078	0.199	0.089	0.082	0.068
Cedar Ridge, UT (trap)	0.082	0.078	0.083	0.220	0.101	0.102	0.073
Cold Springs, UT (2006)	0.093	0.117	0.111	0.199	0.144	0.126	0.103
Cold Springs, UT (trap)	0.064	0.082	0.077	0.194	0.107	0.094	0.066
Delta, UT	0.043	0.033	0.034	0.172	0.067	0.056	0.019
Hill Creek, UT	0.044	0.049	0.047	0.175	0.090	0.079	0.024
Muddy Creek, UT	0.074	0.107	0.110	0.233	0.144	0.120	0.072
North Hills, UT	0.080	0.066	0.070	0.205	0.078	0.073	0.057
Range Creek, UT	0.051	0.058	0.059	0.162	0.079	0.068	0.051
Simbad, UT	0.075	0.076	0.081	0.222	0.129	0.107	0.065
Sulphur, UT	0.105	0.104	0.108	0.276	0.154	0.121	0.079
Sulphur Herd, UT (South, 2006)	0.060	0.066	0.065	0.175	0.079	0.068	0.049
Tilley Creek, UT	0.084	0.069	0.091	0.201	0.125	0.108	0.068
Winter Ridge, UT	0.048	0.054	0.053	0.169	0.067	0.060	0.034
Adobe Town, WY	0.040	0.053	0.055	0.153	0.075	0.064	0.024
Adobe Town, WY (2011)	0.029	0.047	0.052	0.154	0.075	0.064	0.025
Antelope Hills, WY	0.045	0.051	0.051	0.176	0.092	0.070	0.035
Conant Creek, WY (Lander)	0.068	0.059	0.068	0.195	0.104	0.083	0.054
Cooper Creek, WY	0.037	0.041	0.040	0.174	0.079	0.060	0.021
Dishpan Butte, WY (Lander)	0.056	0.053	0.055	0.148	0.087	0.077	0.039
Divide Basin, WY	0.034	0.035	0.040	0.153	0.065	0.051	0.023
Divide Basin, WY (2011)	0.038	0.036	0.044	0.172	0.076	0.059	0.026
Eagles Nest, WY	0.069	0.078	0.069	0.170	0.097	0.079	0.052
Happy Creek Springs, WY	0.058	0.066	0.062	0.173	0.080	0.063	0.048
Little Colorado, WY	0.045	0.055	0.053	0.150	0.072	0.065	0.033
Little Colorado, WY (2011)	0.042	0.048	0.048	0.141	0.064	0.057	0.030
Lost Creek, WY	0.038	0.046	0.043	0.140	0.065	0.048	0.028
Lost Creek, WY (combined)	0.039	0.050	0.048	0.142	0.066	0.052	0.030
McCullough Peaks, WY	0.051	0.047	0.047	0.181	0.086	0.071	0.037
Muskkrat Basin, WY (Lander)	0.066	0.059	0.058	0.159	0.092	0.078	0.039
Salt Wells, WY (East)	0.025	0.049	0.053	0.156	0.073	0.055	0.021
Salt Wells, WY (West)	0.044	0.042	0.046	0.176	0.081	0.068	0.026

	Riddle Herd, OR (2009)	Riddle Mountain, OR	Riddle Mountain, OR (2011)	Sand Springs, OR (2011)	Sheepshead, OR	Sheepshead, OR (2011)	South Steens, OR
Stewart Creek, WY	0.049	0.051	0.044	0.156	0.087	0.068	0.036
Stewart Creek, WY (2009)	0.051	0.053	0.049	0.170	0.072	0.064	0.041
White Mountain, WY (2011)	0.044	0.044	0.053	0.170	0.081	0.067	0.040
Riddle Herd, OR (2009)	0.000						
Riddle Mountain, OR	0.007	0.000	0.000				
Riddle Mountain, OR (2011)	0.006	0.011	0.061				
Sand Springs, OR (2011)	0.056	0.051	0.061	0.000	0.000	0.000	0.000
Sheepshead, OR	0.058	0.052	0.061	0.025	0.009	0.028	0.010
Sheepshead, OR (2011)	0.054	0.047	0.058	0.025	0.026	0.061	0.056
South Steens, OR	0.057	0.055	0.058	0.030	0.033	0.038	0.045
South Steens, OR (2010)	0.054	0.053	0.057	0.034	0.033	0.035	0.025
Stinkingwater, OR	0.094	0.084	0.104	0.068	0.062	0.061	0.056
Three Fingers, OR	0.062	0.058	0.067	0.043	0.043	0.038	0.056
Three Fingers, OR (2011)	0.063	0.060	0.067	0.045	0.038	0.031	0.045
Warm Springs, OR	0.051	0.045	0.054	0.041	0.034	0.031	0.025
Warm Springs, OR (2010)	0.049	0.044	0.052	0.040	0.037	0.035	0.026
Blawn Wash, UT	0.080	0.074	0.081	0.074	0.066	0.063	0.075
Cedar Mountain, UT	0.062	0.064	0.063	0.048	0.046	0.047	0.039
Cedar Ridge, UT	0.077	0.075	0.077	0.065	0.064	0.060	0.069
Cedar Ridge, UT (trap)	0.085	0.088	0.085	0.070	0.075	0.071	0.070
Cold Springs, UT (2006)	0.109	0.114	0.116	0.103	0.113	0.106	0.098
Cold Springs, UT (trap)	0.077	0.082	0.081	0.071	0.073	0.069	0.065
Delta, UT	0.045	0.046	0.048	0.031	0.028	0.027	0.028
Hill Creek, UT	0.055	0.063	0.058	0.040	0.036	0.039	0.030
Muddy Creek, UT	0.129	0.121	0.135	0.079	0.074	0.073	0.085
North Hills, UT	0.085	0.074	0.087	0.075	0.061	0.069	0.064
Range Creek, UT	0.058	0.060	0.061	0.049	0.054	0.048	0.050
Sinbad, UT	0.085	0.079	0.093	0.058	0.056	0.053	0.069
Sulphur, UT	0.130	0.126	0.135	0.101	0.088	0.098	0.092
Sulphur Herd, UT (South, 2006)	0.072	0.070	0.076	0.058	0.048	0.048	0.048
Tilley Creek, UT	0.076	0.069	0.075	0.077	0.077	0.067	0.079
Winter Ridge, UT	0.065	0.070	0.075	0.044	0.037	0.037	0.043

continued

TABLE F-2 Continued

	Riddle Herd, OR (2009)	Riddle Mountain, OR	Riddle Mountain, OR (2011)	Sand Springs, OR (2011)	Sheepshead, OR	Sheepshead, OR (2011)	South Steens, OR
Adobe Town, WY	0.067	0.063	0.075	0.035	0.034	0.031	0.031
Adobe Town, WY (2011)	0.058	0.056	0.065	0.034	0.034	0.032	0.026
Antelope Hills, WY	0.059	0.058	0.072	0.046	0.044	0.044	0.046
Conant Creek, WY (Lander)	0.062	0.066	0.067	0.063	0.053	0.053	0.063
Cooper Creek, WY	0.051	0.050	0.057	0.034	0.029	0.031	0.029
Dishpan Butte, WY (Lander)	0.056	0.053	0.061	0.038	0.039	0.032	0.044
Divide Basin, WY	0.044	0.040	0.052	0.031	0.024	0.022	0.025
Divide Basin, WY (2011)	0.051	0.046	0.056	0.035	0.027	0.025	0.030
Eagles Nest, WY	0.083	0.079	0.090	0.053	0.060	0.052	0.055
Happy Creek Springs, WY	0.081	0.076	0.091	0.047	0.048	0.046	0.058
Little Colorado, WY	0.058	0.050	0.063	0.041	0.038	0.034	0.040
Little Colorado, WY (2011)	0.050	0.043	0.056	0.038	0.036	0.031	0.036
Lost Creek, WY	0.055	0.053	0.062	0.032	0.030	0.026	0.030
Lost Creek, WY (combined)	0.054	0.052	0.062	0.033	0.032	0.027	0.029
McCullough Peaks, WY	0.055	0.049	0.057	0.035	0.041	0.034	0.037
Muskkrat Basin, WY (Lander)	0.064	0.064	0.069	0.041	0.040	0.033	0.048
Salt Wells, WY (East)	0.061	0.057	0.066	0.033	0.027	0.025	0.024
Salt Wells, WY (West)	0.054	0.051	0.061	0.033	0.033	0.026	0.040
Stewart Creek, WY	0.057	0.056	0.061	0.040	0.039	0.035	0.032
Stewart Creek, WY (2009)	0.061	0.055	0.068	0.043	0.041	0.035	0.040
White Mountain, WY (2011)	0.055	0.056	0.065	0.037	0.043	0.038	0.048
South Steens, OR (2010)	0.000	Stinkingwater, OR	Three Fingers, OR	Three Fingers, OR (2011)	Warm Springs, OR	Warm Springs, OR (2010)	Blawn Wash, UT
Stinkingwater, OR	0.058	0.000					
Three Fingers, OR	0.058	0.069	0.000				
Three Fingers, OR (2011)	0.049	0.058	0.016	0.000			
Warm Springs, OR	0.024	0.051	0.047	0.031	0.000		
Warm Springs, OR (2010)	0.026	0.055	0.044	0.030	0.004	0.000	0.000
Blawn Wash, UT	0.063	0.097	0.086	0.087	0.061	0.062	0.000
Cedar Mountain, UT	0.041	0.082	0.066	0.055	0.044	0.039	0.071

Cedar Ridge, UT	0.080	0.111	0.065	0.058	0.069	0.064	0.125
Cedar Ridge, UT (trap)	0.079	0.126	0.087	0.077	0.079	0.076	0.136
Cold Springs, UT (2006)	0.097	0.104	0.098	0.091	0.083	0.085	0.128
Cold Springs, UT (trap)	0.068	0.088	0.086	0.072	0.061	0.064	0.091
Delta, UT	0.030	0.065	0.049	0.043	0.030	0.030	0.077
Hill Creek, UT	0.037	0.082	0.061	0.056	0.050	0.050	0.081
Muddy Creek, UT	0.086	0.093	0.102	0.099	0.088	0.096	0.113
North Hills, UT	0.073	0.087	0.084	0.077	0.058	0.053	0.129
Range Creek, UT	0.055	0.073	0.047	0.040	0.043	0.042	0.093
Sinbad, UT	0.062	0.107	0.094	0.087	0.064	0.069	0.102
Sulphur, UT	0.087	0.138	0.112	0.112	0.085	0.081	0.131
Sulphur Herd, UT (South, 2006)	0.058	0.091	0.071	0.062	0.054	0.055	0.116
Tilley Creek, UT	0.081	0.127	0.078	0.080	0.069	0.070	0.076
Winter Ridge, UT	0.044	0.079	0.058	0.055	0.046	0.048	0.088
Adobe Town, WY	0.034	0.056	0.042	0.038	0.034	0.037	0.086
Adobe Town, WY (2011)	0.026	0.061	0.039	0.036	0.029	0.031	0.074
Antelope Hills, WY	0.045	0.064	0.052	0.057	0.046	0.044	0.096
Conant Creek, WY (Lander)	0.064	0.102	0.063	0.072	0.066	0.068	0.071
Cooper Creek, WY	0.028	0.066	0.050	0.044	0.028	0.027	0.072
Dishpan Butte, WY (Lander)	0.053	0.068	0.048	0.046	0.052	0.055	0.093
Divide Basin, WY	0.029	0.053	0.047	0.040	0.022	0.022	0.071
Divide Basin, WY (2011)	0.032	0.058	0.043	0.038	0.025	0.024	0.070
Eagles Nest, WY	0.061	0.078	0.071	0.065	0.055	0.055	0.112
Happy Creek Springs, WY	0.065	0.063	0.056	0.058	0.051	0.054	0.097
Little Colorado, WY	0.048	0.058	0.045	0.041	0.033	0.033	0.068
Little Colorado, WY (2011)	0.039	0.051	0.047	0.041	0.026	0.027	0.064
Lost Creek, WY	0.033	0.053	0.044	0.038	0.030	0.032	0.077
Lost Creek, WY (combined)	0.032	0.061	0.051	0.041	0.029	0.032	0.080
McCullough Peaks, WY	0.040	0.056	0.059	0.055	0.045	0.045	0.076
Muskkrat Basin, WY (Lander)	0.058	0.076	0.047	0.038	0.051	0.050	0.090
Salt Wells, WY (East)	0.024	0.054	0.042	0.038	0.026	0.027	0.059
Salt Wells, WY (West)	0.038	0.068	0.044	0.044	0.035	0.033	0.063
Stewart Creek, WY	0.036	0.063	0.053	0.045	0.035	0.037	0.082
Stewart Creek, WY (2009)	0.047	0.068	0.060	0.055	0.037	0.040	0.091
White Mountain, WY (2011)	0.038	0.070	0.059	0.061	0.048	0.048	0.065

TABLE F-2 Continued

	Cedar Mountain, UT	Cedar Ridge, UT	Cedar Ridge, UT (trap)	Cold Springs, UT (2006)	Cold Springs, UT (trap)	Delta, UT	Hill Creek, UT
Cedar Mountain, UT	0.000						
Cedar Ridge, UT	0.077	0.000					
Cedar Ridge, UT (trap)	0.075	0.018	0.000				
Cold Springs, UT (2006)	0.101	0.133	0.144	0.000			
Cold Springs, UT (trap)	0.074	0.099	0.103	0.030	0.000		
Delta, UT	0.040	0.063	0.062	0.106	0.068	0.000	
Hill Creek, UT	0.049	0.081	0.073	0.107	0.071	0.033	0.000
Muddy Creek, UT	0.096	0.142	0.145	0.144	0.112	0.079	0.094
North Hills, UT	0.070	0.086	0.096	0.148	0.110	0.048	0.081
Range Creek, UT	0.056	0.029	0.042	0.041	0.034	0.050	0.059
Sinbad, UT	0.085	0.119	0.125	0.140	0.101	0.058	0.076
Sulphur, UT	0.112	0.145	0.152	0.192	0.162	0.075	0.106
Sulphur Herd, UT (South, 2006)	0.063	0.100	0.107	0.132	0.103	0.049	0.055
Tilley Creek, UT	0.082	0.096	0.104	0.150	0.115	0.067	0.082
Winter Ridge, UT	0.052	0.078	0.075	0.113	0.083	0.035	0.028
Adobe Town, WY	0.054	0.074	0.077	0.116	0.087	0.028	0.037
Adobe Town, WY (2011)	0.044	0.067	0.068	0.091	0.070	0.031	0.032
Antelope Hills, WY	0.057	0.079	0.091	0.103	0.083	0.038	0.062
Conant Creek, WY (Lander)	0.078	0.099	0.107	0.141	0.100	0.059	0.063
Cooper Creek, WY	0.047	0.076	0.083	0.114	0.079	0.021	0.041
Dishpan Butte, WY (Lander)	0.064	0.068	0.083	0.124	0.087	0.036	0.052
Divide Basin, WY	0.036	0.051	0.061	0.090	0.067	0.021	0.037
Divide Basin, WY (2011)	0.043	0.051	0.059	0.089	0.067	0.022	0.038
Eagles Nest, WY	0.071	0.080	0.093	0.128	0.102	0.049	0.071
Happy Creek Springs, WY	0.076	0.085	0.103	0.112	0.094	0.057	0.065
Little Colorado, WY	0.053	0.055	0.066	0.097	0.069	0.036	0.052
Little Colorado, WY (2011)	0.049	0.060	0.070	0.091	0.065	0.033	0.049
Lost Creek, WY	0.040	0.065	0.070	0.092	0.066	0.026	0.040
Lost Creek, WY (combined)	0.044	0.064	0.069	0.098	0.067	0.027	0.044
McCullough Peaks, WY	0.063	0.078	0.092	0.113	0.083	0.046	0.053
Muskkrat Basin, WY (Lander)	0.062	0.066	0.079	0.121	0.084	0.035	0.053
Salt Wells, WY (East)	0.039	0.064	0.068	0.093	0.066	0.029	0.030
Salt Wells, WY (West)	0.047	0.067	0.075	0.116	0.085	0.029	0.046
Stewart Creek, WY	0.050	0.068	0.077	0.098	0.076	0.037	0.050

	Muddy Creek, UT	North Hills, UT	Range Creek, UT	Simbad, UT	Sulphur, UT	Sulphur Herd, UT (South, 2006)	Tilley Creek, UT
Stewart Creek, WY (2009)	0.058	0.075	0.083	0.115	0.084	0.038	0.057
White Mountain, WY (2011)	0.065	0.087	0.091	0.110	0.082	0.037	0.053
	Muddy Creek, UT	North Hills, UT	Range Creek, UT	Simbad, UT	Sulphur, UT	Sulphur Herd, UT (South, 2006)	Tilley Creek, UT
Muddy Creek, UT	0.000						
North Hills, UT	0.129	0.000					
Range Creek, UT	0.109	0.082	0.000				
Sinbad, UT	0.122	0.118	0.094	0.000			
Sulphur, UT	0.162	0.086	0.130	0.128	0.000		
Sulphur Herd, UT (South, 2006)	0.114	0.070	0.081	0.092	0.103	0.000	
Tilley Creek, UT	0.140	0.095	0.086	0.122	0.128	0.089	0.000
Winter Ridge, UT	0.097	0.076	0.061	0.080	0.097	0.056	0.072
Adobe Town, WY	0.079	0.067	0.061	0.072	0.094	0.055	0.073
Adobe Town, WY (2011)	0.074	0.066	0.046	0.075	0.098	0.056	0.066
Antelope Hills, WY	0.094	0.070	0.057	0.066	0.104	0.064	0.098
Conant Creek, WY (Lander)	0.117	0.117	0.083	0.094	0.113	0.085	0.081
Cooper Creek, WY	0.086	0.049	0.060	0.062	0.043	0.043	0.078
Dishpan Butte, WY (Lander)	0.088	0.082	0.060	0.076	0.115	0.057	0.077
Divide Basin, WY	0.073	0.051	0.037	0.057	0.090	0.045	0.061
Divide Basin, WY (2011)	0.072	0.053	0.036	0.058	0.080	0.054	0.061
Eagles Nest, WY	0.102	0.088	0.069	0.092	0.119	0.071	0.102
Happy Creek Springs, WY	0.105	0.087	0.064	0.077	0.115	0.072	0.103
Little Colorado, WY	0.097	0.057	0.042	0.094	0.106	0.068	0.068
Little Colorado, WY (2011)	0.097	0.053	0.041	0.084	0.104	0.063	0.060
Lost Creek, WY	0.076	0.062	0.045	0.059	0.092	0.043	0.081
Lost Creek, WY (combined)	0.076	0.068	0.047	0.058	0.099	0.041	0.080
McCullough Peaks, WY	0.115	0.080	0.060	0.070	0.111	0.063	0.082
Muskrat Basin, WY (Lander)	0.093	0.087	0.058	0.083	0.112	0.064	0.084
Salt Wells, WY (East)	0.068	0.063	0.046	0.066	0.081	0.057	0.069
Salt Wells, WY (West)	0.082	0.075	0.057	0.064	0.090	0.069	0.069
Stewart Creek, WY	0.098	0.079	0.049	0.065	0.101	0.045	0.094
Stewart Creek, WY (2009)	0.092	0.075	0.060	0.068	0.112	0.057	0.087
White Mountain, WY (2011)	0.086	0.090	0.064	0.067	0.104	0.073	0.063

continued

TABLE F-2 Continued

	Winter Ridge, UT	Adobe Town, WY	Adobe Town, WY (2011)	Antelope Hills, WY	Conant Creek, WY (Lander)	Cooper Creek, WY	Dishpan Butte, WY (Lander)
Winter Ridge, UT	0.000						
Adobe Town, WY	0.034	0.000					
Adobe Town, WY (2011)	0.028	0.013	0.000				
Antelope Hills, WY	0.061	0.046	0.044	0.000			
Conant Creek, WY (Lander)	0.071	0.066	0.063	0.080	0.000		
Cooper Creek, WY	0.041	0.033	0.036	0.040	0.056	0.000	
Dishpan Butte, WY (Lander)	0.054	0.036	0.047	0.062	0.047	0.042	0.000
Divide Basin, WY	0.032	0.027	0.024	0.028	0.060	0.027	0.034
Divide Basin, WY (2011)	0.036	0.027	0.026	0.033	0.056	0.030	0.036
Eagles Nest, WY	0.065	0.053	0.054	0.050	0.090	0.058	0.054
Happy Creek Springs, WY	0.053	0.051	0.056	0.053	0.079	0.048	0.055
Little Colorado, WY	0.044	0.041	0.038	0.054	0.072	0.045	0.039
Little Colorado, WY (2011)	0.038	0.039	0.035	0.048	0.070	0.040	0.039
Lost Creek, WY	0.033	0.031	0.028	0.033	0.063	0.032	0.040
Lost Creek, WY (combined)	0.036	0.033	0.030	0.038	0.062	0.031	0.035
McCullough Peaks, WY	0.056	0.052	0.051	0.049	0.061	0.044	0.046
Muskat Basin, WY (Lander)	0.057	0.041	0.051	0.070	0.056	0.045	0.014
Salt Wells, WY (East)	0.031	0.018	0.013	0.042	0.057	0.032	0.045
Salt Wells, WY (West)	0.044	0.032	0.033	0.047	0.053	0.031	0.046
Stewart Creek, WY	0.053	0.047	0.046	0.039	0.070	0.040	0.047
Stewart Creek, WY (2009)	0.040	0.039	0.039	0.051	0.077	0.039	0.048
White Mountain, WY (2011)	0.035	0.044	0.037	0.053	0.065	0.044	0.055
	Divide Basin, WY	Divide Basin, WY (2011)	Eagles Nest, WY	Happy Creek Springs, WY	Little Colorado, WY	Little Colorado, WY (2011)	Lost Creek, WY
Divide Basin, WY	0.000						
Divide Basin, WY (2011)	0.007	0.000					
Eagles Nest, WY	0.039	0.045	0.000				
Happy Creek Springs, WY	0.040	0.044	0.053	0.000			
Little Colorado, WY	0.030	0.030	0.045	0.050	0.000		
Little Colorado, WY (2011)	0.024	0.029	0.044	0.046	0.005	0.000	
Lost Creek, WY	0.019	0.024	0.026	0.033	0.034	0.029	0.000
Lost Creek, WY (combined)	0.019	0.025	0.024	0.033	0.033	0.029	0.006
McCullough Peaks, WY	0.037	0.041	0.061	0.048	0.043	0.036	0.039

Musktrat Basin, WY (Lander)	0.038	0.037	0.049	0.062	0.039	0.040	0.038
Salt Wells, WY (East)	0.023	0.023	0.051	0.048	0.035	0.032	0.022
Salt Wells, WY (West)	0.028	0.027	0.057	0.053	0.038	0.039	0.038
Stewart Creek, WY	0.030	0.034	0.029	0.041	0.042	0.036	0.014
Stewart Creek, WY (2009)	0.024	0.033	0.041	0.033	0.042	0.039	0.022
White Mountain, WY (2011)	0.033	0.037	0.068	0.060	0.051	0.040	0.040
Lost Creek, WY (combined)	0.000	0.000	0.000	0.000	0.000	0.000	0.000
McCullough Peaks, WY	0.040	0.057	0.000				
Musktrat Basin, WY (Lander)	0.037	0.045	0.047				
Salt Wells, WY (East)	0.028	0.041	0.045	0.000			
Salt Wells, WY (West)	0.037	0.040	0.040	0.035	0.000		
Stewart Creek, WY	0.017	0.046	0.039	0.039	0.050	0.000	
Stewart Creek, WY (2009)	0.018	0.046	0.053	0.039	0.041	0.032	0.000
White Mountain, WY (2011)	0.041	0.046	0.063	0.037	0.039	0.054	0.000

SOURCE: Data provided by E. Gus Cothran. To access the data, contact the National Research Council's Public Access Records Office at paro@nas.edu.



Press Release

ASPCA Research Confirms Americans Strongly Oppose Slaughter of Horses for Human Consumption

ASPCA urges public support for the American Horse Slaughter Prevention Act

February 01, 2012

[ASPCA Media Contact](#)

NEW YORK—The [ASPCA](#)[®] (The American Society for the Prevention of Cruelty to Animals[®]) today announced in a newly released poll conducted by Lake Research Partners that 80 percent of American voters are opposed to the slaughter of U.S. horses for human consumption. The nationwide survey reveals that Americans oppose horse slaughter overwhelmingly regardless of their gender, political affiliation, whether they live in an urban or rural area, or their geographic location. Further, it confirms that a vast majority of horse owners are also against the slaughtering of our nation's equines.

"The overwhelming majority of Americans are not just against horse slaughter but are intensely opposed to this cruel practice. As more people learn that we are allowing our horses to be shuttled off to a gruesome death all for the sake of foreign gourmands, they are outraged and opposition for this grisly act is growing," said Nancy Perry, senior vice president of ASPCA Government Relations. "Anyone who has been to the movies lately knows the price horses have paid by carrying us to war, building our nation, and serving our entertainment and companionship needs. Americans have a responsibility to protect these intelligent, sensitive animals from being butchered."

Horse slaughter is inherently cruel because the biology of horses makes them difficult to stun and they often remain conscious during their slaughter. In addition, horsemeat can be toxic to humans, as horses are frequently administered drugs that violate the safety regulations mandated for food animals. Furthermore, the majority of horses killed for human consumption are in good condition and could go on to lead productive lives in loving homes. They just happen to be in the wrong place at the wrong time – and this means that any horse, no matter how loved, is just one bad sale away from the slaughterhouse until we ban this practice.

"As a lifelong horse lover and rider, I believe that horses deserve to be treated with respect, and I recognize that horse slaughter has no place in our country as horses are not raised as livestock here, but as companion animals," said Senator Mary Landrieu, D-La. "I will continue working with my colleagues in Congress and other advocates to ensure that the American people are heard and that we stop this inhumane practice once and for all." The last U.S. horse slaughterhouses were closed in 2007, and despite the

fact that Americans do not consume horsemeat, Congress recently failed to continue defunding horsemeat inspections, making it legal for horse slaughterhouses to reopen. The ASPCA urges all caring Americans to support the [American Horse Slaughter Prevention Act](#) (H.R. 2966 and S. 1176), which would prohibit the sale and transport of horses for slaughter in the United States, as well as across the border to Canada and Mexico. The passage of this critical legislation would end the current export and slaughter of approximately 100,000 American horses each year.

“Using tax dollars to fund this inhumane and controversial practice is a wildly unpopular decision, as our research confirms, and has fueled the fire for a complete ban on horse slaughter,” added Perry.

For more information on the American Horse Slaughter Prevention Act, please visit www.asPCA.org/AHSPA.

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About the ASPCA®

Founded in 1866, the ASPCA® (The American Society for the Prevention of Cruelty to Animals®) is the first animal welfare organization in North America and serves as the nation’s leading voice for animals. More than two million supporters strong, the ASPCA’s mission is to provide effective means for the prevention of cruelty to animals throughout the United States. As a 501(c)(3) not-for-profit corporation, the ASPCA is a national leader in the areas of anti-cruelty, community outreach and animal health services. For more information, please visit www.ASPCA.org, and be sure to follow the ASPCA on [Facebook](#), [Twitter](#), and [Pinterest](#).

TO: Center For American Progress

FROM: Hart Research Associates

DATE: June 12, 2013

RE: Equal Ground—Balancing Conservation And Drilling On America’s Public Lands

Hart Research conducted qualitative and quantitative research on public opinion about the recent oil and gas boom, its impacts, and preferred uses of public lands. Following four focus groups, a telephone survey was conducted from May 2 to 10, 2013, among 993 voters living in nine states in the mountain west region.¹

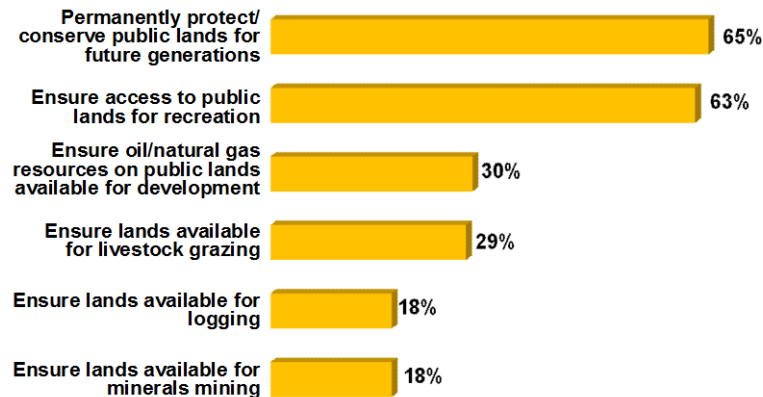
The survey results highlight several key factors that put moderates and progressives in a strong position to win both the policy and political debate over 1) how to appropriately develop oil and gas on public lands, and 2) the need for new national parks, wilderness, monuments, and outdoor recreation opportunities for the public.

1) Two pillars define what is at stake for public lands: ensuring access to recreational activities and permanently protecting public lands for future generations. Far fewer voters place top priority on ensuring that oil and gas on public lands are available for development.

About two in three (65%) voters say that permanently protecting and conserving public lands for future generations is very important to them personally, and another 63% say that ensuring access to public lands for recreation activities is personally important to them (as indicated by a rating of “9” or “10” on a zero-to-10 scale). By comparison, only half as many voters (30%) say the same about making sure oil and gas resources on public lands are available for development. Oil and gas even fails to make top priority among a majority of Republicans (45%). Along these same lines, voters favor a government approach to public lands that focuses more on conserving (49%) as opposed to opportunities for oil and natural gas drilling (29%).

There are two standout priorities for public lands: access to recreational activities and permanent protection.

Very important priority for public lands managed by federal government*



*9-10 ratings on zero-to-10 scale, 10 = extremely important priority

While permanently protecting public lands for future generations is a top priority among allies, ensuring access to recreational activities cuts across party lines. Majorities of Democrats (58%), independents (63%), and Republicans (66%) rate recreational activities as very important to them personally when it comes to public lands.

Voters' greatest concerns about federal management of drilling on public lands are environmental. Majorities of voters have major concerns that the federal government allows drilling in areas that could create environmental hazards to neighboring communities (60%) or allows drilling in environmentally sensitive areas (56%).

Oil companies being subjected to the hassle and inconvenience of bureaucratic red tape are substantially lesser concerns and can be trumped by informing voters that oil and gas companies are not using thousands of permits that they already have. Only 39% of voters have major concerns that the government places too many restrictions on oil and gas drilling on public lands and only 35% are concerned that the government places too many areas off limits for drilling.

In head-to-head matchups, oil and gas companies' inaction on current permits is a stronger pushback against restrictive government policies and red tape than arguing that government decisions are biased toward oil and gas companies. Voters are divided evenly between the position that restrictive policies and red tape are holding back energy development (39%) and that government decisions about whether to lease public lands are tilted in favor of oil and gas companies (39%). But more voters say that their opinion is closer to the position that oil and gas companies already are sitting on 7,000 permits on public lands where they are allowed to drill but are not drilling (45%) than the position that restrictive policies and red tape position are holding back energy development unnecessarily (38%).

2) The strongest arguments for protecting public lands center on preserving them for future generations, jobs, and economic growth.

The two arguments that voters find the most compelling acknowledge the value of energy development on public lands but contend that we must exercise caution in order to protect these lands for future generations. Highlighting the enormous contribution that public lands make to the economy through outdoor recreation also makes a strong case for voters. All three messages listed below are endorsed consistently among large majorities of voters across party lines in the same rank order.

- ✓ We need energy development, and the jobs and economic growth that come with it. However, some places are just too special to drill. We must make decisions carefully so we protect important places for future generations.
- ✓ Our public lands are huge economic engines for the nation. From energy development to tourism and outdoor recreation, our lands and waters power our economy and create jobs. We must manage our public lands wisely and sustainably so they are available for generations to come.
- ✓ Our nation's public lands and waters support a \$646 million outdoor recreation economy. Access to quality places to play outside is not only important for families, outdoor enthusiasts, and sportsmen; it is also critical to businesses, fundamental to recruiting employers, and at the heart of healthy and productive communities.

Parks, communities, and water sources rise to the top of places that should be off limits: nearly half of voters say drilling should not be allowed on national parks (48%), public lands near where people live (47%), and water sources (46%). Only 10% do not choose any type of public lands to be off limits.

When asked to choose among six succinct themes, voters overall say that the most important reason for the federal government to focus more on protecting and conserving public lands is so

that public lands are available for future generations to enjoy (24%). This is the top reason among Democrats (26%) and independents (29%) alike. Republicans are the outlier here in that they give approximately equal weight to conserving for future generations' enjoyment (21%) and public lands' contribution to the economy and job creation (24%).

3) Voters say we can protect and conserve more public lands AND develop domestic energy sources.

Voters reject the idea that there must be a single-minded, "either/or" approach to public lands. When explicitly given the opportunity to choose a third option, a majority (55%) instead say the government should put conservation on equal ground with drilling for oil and gas. This is the case among independents (59%), Republicans (64%), hunters and anglers (57%), and even among people who rate oil and gas as very important to them personally (57%). Democrats, in contrast, are divided between putting drilling and conservation on equal ground (44%) and focusing more on conservation and protection (47%).

Consistent with voters' overall preference for a balanced approach to public lands, voters also strongly prefer that the Obama administration's "all-of-the-above" energy policy include more protection for public lands. Nearly twice as many voters want an "all-of-the-above" energy policy to include more protection for public lands (59%) as want the administration to focus strictly on expanding energy development (32%).

4) Voters strongly endorse several proposals designed to address drilling for oil and gas on public lands, particularly using money from leases to repair damage from drilling.

A large majority (78%) of voters strongly favor using some of the money collected from oil and natural gas drilling on public lands to repair damage caused by drilling to land, fish, and wildlife habitat. This proposal receives strong bipartisan support with 69% of Republicans and 86% of Democrats endorsing it. A proposal to use money from leases to research and develop alternative clean energy sources also receives strong support (63%) albeit more modestly among Republicans (52% compared with 76% of Democrats). Voters even are amenable to the idea of making oil and gas companies pay more money to drill on public lands. Nearly three in five (58%) voters—including 69% of Democrats, 57% of independents, and nearly half (47%) of Republicans—say they strongly favor making oil and gas companies pay similar rates to what they pay on state and private lands to ensure that taxpayers receive a fair return for use of energy resources.

Framing how payment is procured from oil and gas companies, however, is key for ensuring bipartisan support. In contrast to taking some of the money oil and gas companies already pay or increasing the cost of leasing public lands, charging an upfront fee to address potential damage likely is a nonstarter for Republicans. While 57% of voters overall strongly favor charging oil and gas companies an upfront fee to address damage that drilling might cause to public lands, only 36% of Republicans say the same.

¹The sample included approximately 150 voters from Colorado (150), Montana (150), New Mexico (152), and Oregon (151) as well as approximately 75 voters in the following five states: Arizona (78), Idaho (75), Nevada (83), Utah (77), and Wyoming (77). The sample is weighted to include each state relative to the size of its actual registered electorate.

National Survey Results

Are you aware that wild horses and burros roam free on public lands in the Western United States?

Aware..... 71%
Not aware 19%
Not sure 10%

Wild horses are protected by an act of Congress as “living symbols of the history and pioneer spirit of the West” that “enrich the lives of the American people.”

Support protecting them..... 72%
Do not support protecting them..... 10%
Not sure 18%

Buyers can purchase wild horses for as little as \$10 per horse directly from government holding facilities thanks to a loophole in federal law called the Burns Amendment. These horses often end up at slaughterhouses in Canada or Mexico. Last year, the government sold “truckload after truckload” of horses to a known kill buyer who shipped them to the Mexican border. Do you think the law should be amended to repeal the Burns Amendment and prevent the sale and slaughter of federally protected wild horses?

Support 62%
Oppose 13%
Not sure 25%

National Survey Results

In 2012, the federal government spent 70% of its budget, or \$50 billion, to capture and hold wild horses and burros, while spending less than 4% of its budget on fertility control and other measures to keep wild horses on the range. The resulting stockpiling of horses in government holding facilities costs taxpayers more than \$100,000 per day. Do you think that's an efficient use of taxpayer dollars?

It is an efficient use of taxpayer dollars 8%
It is not 66%
Not sure 26%

Knowing what you know now, do you believe the government's wild horse and burro program is effectively managed by the federal Interior Department, or not?

It is being managed effectively 7%
It is not 62%
Not sure 32%

In the last presidential election, did you vote for Barack Obama or Mitt Romney?

Barack Obama 50%
Mitt Romney 44%
Someone else/Don't remember 6%

National Survey Results

Would you describe yourself as very liberal, somewhat liberal, moderate, somewhat conservative, or very conservative?

<i>Very liberal</i>	11%
<i>Somewhat liberal</i>	16%
<i>Moderate</i>	31%
<i>Somewhat conservative</i>	23%
<i>Very conservative</i>	19%

If you are a woman, press 1. If a man, press 2.

<i>Woman</i>	50%
<i>Man</i>	50%

If you are a Democrat, press 1. If a Republican, press 2. If you are an independent or identify with another party, press 3.

<i>Democrat</i>	38%
<i>Republican</i>	34%
<i>Independent/Other</i>	28%

If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

<i>Hispanic</i>	11%
<i>White</i>	72%
<i>African-American</i>	12%
<i>Other</i>	5%

If you are 18 to 29 years old, press 1. If 30 to 45, press 2. If 46 to 65, press 3. If you are older than 65, press 4.

<i>18 to 29</i>	15%
<i>30 to 45</i>	20%
<i>46 to 65</i>	45%
<i>Older than 65</i>	20%



National Survey Results

Q1 Currently in the United States, wild horses are protected under federal law and slaughtering them is prohibited. Some in Congress are trying to overturn this ban to allow for mass slaughter of wild horses. Do you want Congress to continue the ban on horse slaughter OR overturn the ban and allow the slaughter of wild horses?

- Want Congress to continue the ban on horse slaughter* 75%
- Want Congress to overturn the ban and allow the slaughter of wild horses* 18%
- Not sure* 7%

Q2 By unanimous Act of Congress, wild horses and burros living on Western public lands have been protected as historic symbols of American freedom for nearly 50 years. But now, some in Congress propose to eliminate this protection, allowing for mass slaughter of more than 90,000 wild horses and the sale of wild horses to foreign slaughterhouses for human consumption. Do you think Congress should continue to protect wild horses from slaughter, or do you think we should end protections and allow slaughter of America's wild horses?

- Prefer continuing protection of America's wild horses from slaughter* 80%
- Think we should end protections and allow slaughter of America's wild horses* 15%
- Not sure* 6%

Q3 A 2013 study by the National Academy of Sciences concluded that administering birth control to wild horse herds provides an effective, humane and cost-effective way to manage America's wild horses. Nevertheless, some members of Congress want to abolish humane birth control as a method for controlling wild horse populations. This will increase current program costs for US taxpayers, and lead to the sale and slaughter of wild horses. Would you support or oppose the use of humane wild horse birth control programs instead of slaughtering wild horses?

- Support the use of humane wild horse birth control as a means of controlling America's wild horse population* 76%
- Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population* 15%
- Not sure* 9%

Q4 If your member of Congress were to support a measure that would allow the mass killing of wild horses and unrestricted sales of wild horses to foreign slaughterhouses, would you be less likely or more likely to support them, or would it not make a difference?

- Less likely* 65%
- More likely* 12%
- Wouldn't make a difference* 15%
- Not sure* 8%





Q5 Regardless of your position on horse slaughter, what do you think is the best reason for Congress to continue to protect wild horses: they're national symbols of freedom and part of the history of the American West; there's a proven, cost-effective and humane way to manage them; slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong; management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter; or something else?

- They're national symbols of freedom and part of the history of the American West* 41%
- There's a proven, cost-effective and humane way to manage them*..... 24%
- Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong* 12%
- Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter*..... 9%
- Something else* 10%
- Not sure* 4%

Q6 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, Libertarian Gary Johnson, Green Party candidate Jill Stein, or someone else?

- Donald Trump* 44%
- Hillary Clinton*..... 45%
- Gary Johnson* 3%
- Jill Stein* 1%
- Someone else*..... 7%

Q7 If you are a woman, press 1. If a man, press 2.

- Woman* 53%
- Man*..... 47%

Q8 If you are a Democrat, press 1. If a Republican, press 2. If an Independent, press 3.

- Democrat* 43%
- Republican*..... 32%
- Independent*..... 24%

Q9 If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

- Hispanic*..... 9%
- White* 74%
- African-American* 12%
- Other*..... 5%

Q10 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

- 18 to 45*..... 34%
- 46 to 65*..... 36%
- Older than 65*..... 30%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Continue or Overturn Ban on Horse Slaughter						
Want Congress to continue the ban on horse slaughter	75%	78%	73%	70%	83%	58%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	14%	20%	13%	17%	38%
Not sure	7%	8%	7%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Congress Continue or End Protections for Horses						
Prefer continuing protection of America's wild horses from slaughter	80%	86%	77%	70%	83%	58%
Think we should end protections and allow slaughter of America's wild horses	15%	9%	17%	13%	17%	38%
Not sure	6%	5%	6%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Horse Birth Control Support/Oppose						
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	74%	82%	56%	83%	52%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	15%	10%	15%	17%	40%
Not sure	9%	11%	7%	29%	-	8%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Representative Support Horse Slaughter Less/More Likely						
Less likely	65%	69%	65%	35%	68%	45%
More likely	12%	9%	10%	13%	17%	41%
Wouldn't make a difference	15%	15%	16%	17%	15%	7%
Not sure	8%	7%	8%	35%	-	7%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hnson	Jill Stein	Someon- e else
Best Reason to Protect Horses						
They're national symbols of freedom and part of the history of the American West	41%	51%	34%	17%	9%	35%
There's a proven, cost-effective and humane way to manage them	24%	20%	31%	8%	74%	5%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	13%	27%	-	6%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	7%	10%	18%	-	8%
Something else	10%	8%	8%	21%	17%	33%
Not sure	4%	3%	4%	9%	-	14%

	Base	Gender	
		Wom...	Man
Continue or Overturn Ban on Horse Slaughter			
Want Congress to continue the ban on horse slaughter	75%	80%	68%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	12%	25%
Not sure	7%	8%	7%

	Base	Gender	
		Wom...	Man
Congress Continue or End Protections for Horses			
Prefer continuing protection of America's wild horses from slaughter	80%	86%	72%
Think we should end protections and allow slaughter of America's wild horses	15%	9%	21%
Not sure	6%	5%	6%

	Base	Gender	
		Wom...	Man
Horse Birth Control Support/Oppose			
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	84%	67%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	9%	21%
Not sure	9%	7%	11%





	Base	Gender	
		Wom...	Man
Representative Support Horse Slaughter Less/More Likely			
Less likely	65%	69%	61%
More likely	12%	12%	12%
Wouldn't make a difference	15%	10%	21%
Not sure	8%	10%	7%

	Base	Gender	
		Wom...	Man
Best Reason to Protect Horses			
They're national symbols of freedom and part of the history of the American West	41%	45%	36%
There's a proven, cost-effective and humane way to manage them	24%	25%	24%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	13%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	7%	10%
Something else	10%	8%	14%
Not sure	4%	4%	4%

	Base	Party		
		Democr...	Republic...	Independe...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	75%	76%	72%	76%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	16%	19%	20%
Not sure	7%	9%	9%	4%

	Base	Party		
		Democr...	Republic...	Independe...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	80%	79%	81%	78%
Think we should end protections and allow slaughter of America's wild horses	15%	13%	14%	20%
Not sure	6%	8%	5%	3%





	Base	Party		
		Democr...	Republic...	Independe...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	76%	78%	73%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	15%	13%	18%
Not sure	9%	10%	9%	9%

	Base	Party		
		Democr...	Republic...	Independe...
Representative Support Horse Slaughter Less/More Likely				
Less likely	65%	62%	67%	68%
More likely	12%	13%	10%	13%
Wouldn't make a difference	15%	16%	14%	14%
Not sure	8%	10%	9%	5%

	Base	Party		
		Democr...	Republic...	Independe...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	41%	37%	49%	37%
There's a proven, cost-effective and humane way to manage them	24%	24%	23%	26%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	14%	11%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	9%	6%	10%
Something else	10%	10%	7%	15%
Not sure	4%	5%	4%	3%

	Base	Race			
		Hispani- c	White	African- Americ...	Other
Continue or Overturn Ban on Horse Slaughter					
Want Congress to continue the ban on horse slaughter	75%	70%	76%	71%	66%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	27%	16%	25%	19%
Not sure	7%	3%	8%	4%	16%





	Base	Race			
		Hispani- c	White	African- Americ...	Other
Congress Continue or End Protections for Horses					
Prefer continuing protection of America's wild horses from slaughter	80%	78%	83%	67%	67%
Think we should end protections and allow slaughter of America's wild horses	15%	20%	12%	30%	15%
Not sure	6%	2%	6%	3%	18%

	Base	Race			
		Hispani- c	White	African- Americ...	Other
Horse Birth Control Support/Oppose					
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	63%	82%	56%	58%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	33%	10%	29%	21%
Not sure	9%	4%	8%	15%	21%

	Base	Race			
		Hispani- c	White	African- Americ...	Other
Representative Support Horse Slaughter Less/More Likely					
Less likely	65%	48%	71%	43%	51%
More likely	12%	23%	6%	36%	19%
Wouldn't make a difference	15%	18%	16%	8%	16%
Not sure	8%	12%	7%	12%	15%





	Base	Race			
		Hispani- c	White	African- Americ...	Other
Best Reason to Protect Horses					
They're national symbols of freedom and part of the history of the American West	41%	52%	39%	46%	31%
There's a proven, cost-effective and humane way to manage them	24%	13%	27%	15%	21%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	15%	12%	8%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	1%	10%	7%	6%
Something else	10%	11%	8%	24%	19%
Not sure	4%	8%	4%	-	13%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	75%	63%	83%	77%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	28%	12%	14%
Not sure	7%	9%	4%	9%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	80%	67%	86%	85%
Think we should end protections and allow slaughter of America's wild horses	15%	27%	10%	7%
Not sure	6%	6%	4%	8%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	73%	74%	82%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	22%	14%	8%
Not sure	9%	6%	12%	10%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Representative Support Horse Slaughter Less/More Likely				
Less likely	65%	60%	66%	69%
More likely	12%	15%	11%	10%
Wouldn't make a difference	15%	19%	13%	13%
Not sure	8%	7%	9%	9%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	41%	35%	35%	53%
There's a proven, cost-effective and humane way to manage them	24%	28%	23%	21%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	15%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	2%	15%	8%
Something else	10%	17%	7%	7%
Not sure	4%	6%	4%	2%



National Survey Results

Are you aware that wild horses and burros roam free on public lands in the Western United States?

Aware..... 71%
Not aware 19%
Not sure 10%

Wild horses are protected by an act of Congress as “living symbols of the history and pioneer spirit of the West” that “enrich the lives of the American people.”

Support protecting them..... 72%
Do not support protecting them..... 10%
Not sure 18%

Buyers can purchase wild horses for as little as \$10 per horse directly from government holding facilities thanks to a loophole in federal law called the Burns Amendment. These horses often end up at slaughterhouses in Canada or Mexico. Last year, the government sold “truckload after truckload” of horses to a known kill buyer who shipped them to the Mexican border. Do you think the law should be amended to repeal the Burns Amendment and prevent the sale and slaughter of federally protected wild horses?

Support 62%
Oppose 13%
Not sure 25%

National Survey Results

In 2012, the federal government spent 70% of its budget, or \$50 billion, to capture and hold wild horses and burros, while spending less than 4% of its budget on fertility control and other measures to keep wild horses on the range. The resulting stockpiling of horses in government holding facilities costs taxpayers more than \$100,000 per day. Do you think that's an efficient use of taxpayer dollars?

It is an efficient use of taxpayer dollars 8%
It is not 66%
Not sure 26%

Knowing what you know now, do you believe the government's wild horse and burro program is effectively managed by the federal Interior Department, or not?

It is being managed effectively 7%
It is not 62%
Not sure 32%

In the last presidential election, did you vote for Barack Obama or Mitt Romney?

Barack Obama 50%
Mitt Romney 44%
Someone else/Don't remember 6%

National Survey Results

Would you describe yourself as very liberal, somewhat liberal, moderate, somewhat conservative, or very conservative?

<i>Very liberal</i>	11%
<i>Somewhat liberal</i>	16%
<i>Moderate</i>	31%
<i>Somewhat conservative</i>	23%
<i>Very conservative</i>	19%

If you are a woman, press 1. If a man, press 2.

<i>Woman</i>	50%
<i>Man</i>	50%

If you are a Democrat, press 1. If a Republican, press 2. If you are an independent or identify with another party, press 3.

<i>Democrat</i>	38%
<i>Republican</i>	34%
<i>Independent/Other</i>	28%

If you are Hispanic, press 1. If white, press 2.
If African-American, press 3. If other, press 4.

<i>Hispanic</i>	11%
<i>White</i>	72%
<i>African-American</i>	12%
<i>Other</i>	5%

If you are 18 to 29 years old, press 1. If 30 to 45, press 2. If 46 to 65, press 3. If you are older than 65, press 4.

<i>18 to 29</i>	15%
<i>30 to 45</i>	20%
<i>46 to 65</i>	45%
<i>Older than 65</i>	20%



Press Release

ASPCA Research Confirms Americans Strongly Oppose Slaughter of Horses for Human Consumption

ASPCA urges public support for the American Horse Slaughter Prevention Act

February 01, 2012

[ASPCA Media Contact](#)

NEW YORK—The [ASPCA](#)[®] (The American Society for the Prevention of Cruelty to Animals[®]) today announced in a newly released poll conducted by Lake Research Partners that 80 percent of American voters are opposed to the slaughter of U.S. horses for human consumption. The nationwide survey reveals that Americans oppose horse slaughter overwhelmingly regardless of their gender, political affiliation, whether they live in an urban or rural area, or their geographic location. Further, it confirms that a vast majority of horse owners are also against the slaughtering of our nation's equines.

"The overwhelming majority of Americans are not just against horse slaughter but are intensely opposed to this cruel practice. As more people learn that we are allowing our horses to be shuttled off to a gruesome death all for the sake of foreign gourmands, they are outraged and opposition for this grisly act is growing," said Nancy Perry, senior vice president of ASPCA Government Relations. "Anyone who has been to the movies lately knows the price horses have paid by carrying us to war, building our nation, and serving our entertainment and companionship needs. Americans have a responsibility to protect these intelligent, sensitive animals from being butchered."

Horse slaughter is inherently cruel because the biology of horses makes them difficult to stun and they often remain conscious during their slaughter. In addition, horsemeat can be toxic to humans, as horses are frequently administered drugs that violate the safety regulations mandated for food animals. Furthermore, the majority of horses killed for human consumption are in good condition and could go on to lead productive lives in loving homes. They just happen to be in the wrong place at the wrong time – and this means that any horse, no matter how loved, is just one bad sale away from the slaughterhouse until we ban this practice.

"As a lifelong horse lover and rider, I believe that horses deserve to be treated with respect, and I recognize that horse slaughter has no place in our country as horses are not raised as livestock here, but as companion animals," said Senator Mary Landrieu, D-La. "I will continue working with my colleagues in Congress and other advocates to ensure that the American people are heard and that we stop this inhumane practice once and for all." The last U.S. horse slaughterhouses were closed in 2007, and despite the

fact that Americans do not consume horsemeat, Congress recently failed to continue defunding horsemeat inspections, making it legal for horse slaughterhouses to reopen. The ASPCA urges all caring Americans to support the [American Horse Slaughter Prevention Act](#) (H.R. 2966 and S. 1176), which would prohibit the sale and transport of horses for slaughter in the United States, as well as across the border to Canada and Mexico. The passage of this critical legislation would end the current export and slaughter of approximately 100,000 American horses each year.

“Using tax dollars to fund this inhumane and controversial practice is a wildly unpopular decision, as our research confirms, and has fueled the fire for a complete ban on horse slaughter,” added Perry.

For more information on the American Horse Slaughter Prevention Act, please visit www.asPCA.org/AHSPA.

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About the ASPCA®

Founded in 1866, the ASPCA® (The American Society for the Prevention of Cruelty to Animals®) is the first animal welfare organization in North America and serves as the nation’s leading voice for animals. More than two million supporters strong, the ASPCA’s mission is to provide effective means for the prevention of cruelty to animals throughout the United States. As a 501(c)(3) not-for-profit corporation, the ASPCA is a national leader in the areas of anti-cruelty, community outreach and animal health services. For more information, please visit www.ASPCA.org, and be sure to follow the ASPCA on [Facebook](#), [Twitter](#), and [Pinterest](#).

TO: Center For American Progress

FROM: Hart Research Associates

DATE: June 12, 2013

RE: Equal Ground—Balancing Conservation And Drilling On America’s Public Lands

Hart Research conducted qualitative and quantitative research on public opinion about the recent oil and gas boom, its impacts, and preferred uses of public lands. Following four focus groups, a telephone survey was conducted from May 2 to 10, 2013, among 993 voters living in nine states in the mountain west region.¹

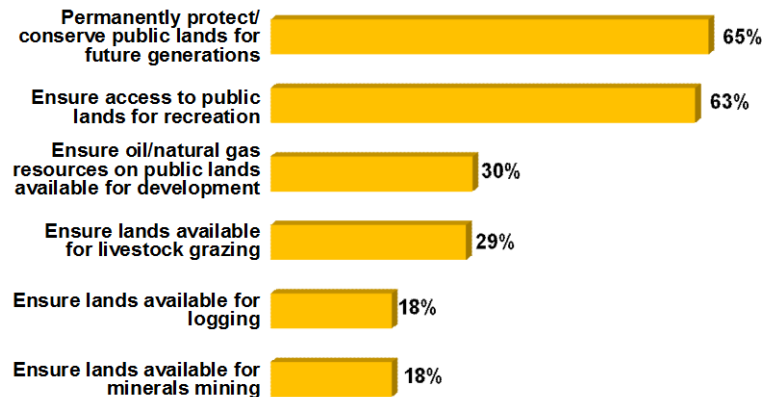
The survey results highlight several key factors that put moderates and progressives in a strong position to win both the policy and political debate over 1) how to appropriately develop oil and gas on public lands, and 2) the need for new national parks, wilderness, monuments, and outdoor recreation opportunities for the public.

1) Two pillars define what is at stake for public lands: ensuring access to recreational activities and permanently protecting public lands for future generations. Far fewer voters place top priority on ensuring that oil and gas on public lands are available for development.

About two in three (65%) voters say that permanently protecting and conserving public lands for future generations is very important to them personally, and another 63% say that ensuring access to public lands for recreation activities is personally important to them (as indicated by a rating of “9” or “10” on a zero-to-10 scale). By comparison, only half as many voters (30%) say the same about making sure oil and gas resources on public lands are available for development. Oil and gas even fails to make top priority among a majority of Republicans (45%). Along these same lines, voters favor a government approach to public lands that focuses more on conserving (49%) as opposed to opportunities for oil and natural gas drilling (29%).

There are two standout priorities for public lands: access to recreational activities and permanent protection.

Very important priority for public lands managed by federal government*



*9-10 ratings on zero-to-10 scale, 10 = extremely important priority

While permanently protecting public lands for future generations is a top priority among allies, ensuring access to recreational activities cuts across party lines. Majorities of Democrats (58%), independents (63%), and Republicans (66%) rate recreational activities as very important to them personally when it comes to public lands.

Voters' greatest concerns about federal management of drilling on public lands are environmental. Majorities of voters have major concerns that the federal government allows drilling in areas that could create environmental hazards to neighboring communities (60%) or allows drilling in environmentally sensitive areas (56%).

Oil companies being subjected to the hassle and inconvenience of bureaucratic red tape are substantially lesser concerns and can be trumped by informing voters that oil and gas companies are not using thousands of permits that they already have. Only 39% of voters have major concerns that the government places too many restrictions on oil and gas drilling on public lands and only 35% are concerned that the government places too many areas off limits for drilling.

In head-to-head matchups, oil and gas companies' inaction on current permits is a stronger pushback against restrictive government policies and red tape than arguing that government decisions are biased toward oil and gas companies. Voters are divided evenly between the position that restrictive policies and red tape are holding back energy development (39%) and that government decisions about whether to lease public lands are tilted in favor of oil and gas companies (39%). But more voters say that their opinion is closer to the position that oil and gas companies already are sitting on 7,000 permits on public lands where they are allowed to drill but are not drilling (45%) than the position that restrictive policies and red tape position are holding back energy development unnecessarily (38%).

2) The strongest arguments for protecting public lands center on preserving them for future generations, jobs, and economic growth.

The two arguments that voters find the most compelling acknowledge the value of energy development on public lands but contend that we must exercise caution in order to protect these lands for future generations. Highlighting the enormous contribution that public lands make to the economy through outdoor recreation also makes a strong case for voters. All three messages listed below are endorsed consistently among large majorities of voters across party lines in the same rank order.

- ✓ We need energy development, and the jobs and economic growth that come with it. However, some places are just too special to drill. We must make decisions carefully so we protect important places for future generations.
- ✓ Our public lands are huge economic engines for the nation. From energy development to tourism and outdoor recreation, our lands and waters power our economy and create jobs. We must manage our public lands wisely and sustainably so they are available for generations to come.
- ✓ Our nation's public lands and waters support a \$646 million outdoor recreation economy. Access to quality places to play outside is not only important for families, outdoor enthusiasts, and sportsmen; it is also critical to businesses, fundamental to recruiting employers, and at the heart of healthy and productive communities.

Parks, communities, and water sources rise to the top of places that should be off limits: nearly half of voters say drilling should not be allowed on national parks (48%), public lands near where people live (47%), and water sources (46%). Only 10% do not choose any type of public lands to be off limits.

When asked to choose among six succinct themes, voters overall say that the most important reason for the federal government to focus more on protecting and conserving public lands is so

that public lands are available for future generations to enjoy (24%). This is the top reason among Democrats (26%) and independents (29%) alike. Republicans are the outlier here in that they give approximately equal weight to conserving for future generations' enjoyment (21%) and public lands' contribution to the economy and job creation (24%).

3) Voters say we can protect and conserve more public lands AND develop domestic energy sources.

Voters reject the idea that there must be a single-minded, "either/or" approach to public lands. When explicitly given the opportunity to choose a third option, a majority (55%) instead say the government should put conservation on equal ground with drilling for oil and gas. This is the case among independents (59%), Republicans (64%), hunters and anglers (57%), and even among people who rate oil and gas as very important to them personally (57%). Democrats, in contrast, are divided between putting drilling and conservation on equal ground (44%) and focusing more on conservation and protection (47%).

Consistent with voters' overall preference for a balanced approach to public lands, voters also strongly prefer that the Obama administration's "all-of-the-above" energy policy include more protection for public lands. Nearly twice as many voters want an "all-of-the-above" energy policy to include more protection for public lands (59%) as want the administration to focus strictly on expanding energy development (32%).

4) Voters strongly endorse several proposals designed to address drilling for oil and gas on public lands, particularly using money from leases to repair damage from drilling.

A large majority (78%) of voters strongly favor using some of the money collected from oil and natural gas drilling on public lands to repair damage caused by drilling to land, fish, and wildlife habitat. This proposal receives strong bipartisan support with 69% of Republicans and 86% of Democrats endorsing it. A proposal to use money from leases to research and develop alternative clean energy sources also receives strong support (63%) albeit more modestly among Republicans (52% compared with 76% of Democrats). Voters even are amenable to the idea of making oil and gas companies pay more money to drill on public lands. Nearly three in five (58%) voters—including 69% of Democrats, 57% of independents, and nearly half (47%) of Republicans—say they strongly favor making oil and gas companies pay similar rates to what they pay on state and private lands to ensure that taxpayers receive a fair return for use of energy resources.

Framing how payment is procured from oil and gas companies, however, is key for ensuring bipartisan support. In contrast to taking some of the money oil and gas companies already pay or increasing the cost of leasing public lands, charging an upfront fee to address potential damage likely is a nonstarter for Republicans. While 57% of voters overall strongly favor charging oil and gas companies an upfront fee to address damage that drilling might cause to public lands, only 36% of Republicans say the same.

¹The sample included approximately 150 voters from Colorado (150), Montana (150), New Mexico (152), and Oregon (151) as well as approximately 75 voters in the following five states: Arizona (78), Idaho (75), Nevada (83), Utah (77), and Wyoming (77). The sample is weighted to include each state relative to the size of its actual registered electorate.



Nevada Survey Results

Q1 The Virginia Range mustangs are a historic wild horse population that has lived in and around the Reno area for over a century. For the last three years, the state has partnered with a non-profit for the protection and management of the historic herd. Last year, the state abruptly terminated that Cooperative Agreement and decided instead to give away all the horses to a private party. Once transferred, the wild horses would become the property of the new owner, who would have the right to do what they want with the horses, including rounding them up and slaughtering them. Do you think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses, or transfer ownership to a private owner who could legally round the horses up and send them for slaughter?

Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses 75%

Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter..... 17%

Not sure 7%

Q2 Generally speaking do you think Nevada's wild horses should be protected from roundups and slaughter, or not?

Think Nevada's wild horses should be protected from roundups and slaughter 75%

Do not think Nevada's wild horses should be protected from roundups and slaughter 18%

Not sure 8%

Q3 I'm going to read you a series of statements on this issue, and after each one, ask if you strongly agree, somewhat agree, somewhat disagree or strongly disagree. Here's the first one: The public/private partnership for management of the Virginia Range horses is a model program to protect and manage a historic herd without costing taxpayers. Public/private partnerships can protect our natural resources while saving taxpayers money.

Strongly agree 47%

Somewhat agree..... 23%

Somewhat disagree 8%

Strongly disagree..... 7%

Not sure 14%

Q4 Here's the next one: The state legislature passed a law to authorize the Department of Agriculture to enter into cooperative agreements with non-profit organizations to protect and manage the Virginia Range horses. The state should follow the legislation and partner with nonprofit groups to manage the horses.

Strongly agree 53%

Somewhat agree..... 19%

Somewhat disagree 9%

Strongly disagree..... 8%

Not sure 11%





Q5 Here's the next one: The Agriculture Department says the program wasn't working and therefore wants to give away the horses -- even if it means the horses are eventually sold for slaughter in Mexico. The Agriculture Department should give away the horses instead of fixing the public/private partnership.

- Strongly agree* 16%
- Somewhat agree*..... 7%
- Somewhat disagree*..... 20%
- Strongly disagree*..... 51%
- Not sure* 7%

Q6 Here's the next one: Mustangs are a defining symbol of our state and the American West, and they should be protected and humanely managed, not slaughtered.

- Strongly agree* 77%
- Somewhat agree*..... 9%
- Somewhat disagree*..... 5%
- Strongly disagree*..... 6%
- Not sure* 3%

Q7 Having heard all the information in this poll, let me ask you again: Do you think the state should: continue the non-profit partnership to protect and manage the Virginia Range wild horses, or transfer ownership to a private owner who could legally round the horses up and send them for slaughter?

- Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses* 76%
- Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter*..... 17%
- Not sure* 7%

Q8 In general, what do you think is the best approach to managing the wild horse population: humane birth control, or roundups and slaughter?

- Humane birth control*..... 75%
- Roundups and slaughter*..... 14%
- Not sure*..... 11%

Q9 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, someone else, or did you not vote in the election?

- Donald Trump* 43%
- Hillary Clinton*..... 45%
- Someone else / Did not vote*..... 12%

Q10 If you are a woman, press 1. If a man, press 2.

- Woman* 53%
- Man*..... 47%

Q11 If you are a Democrat, press 1. If a Republican, press 2. If an independent or a member of another party, press 3.

- Democrat* 43%
- Republican*..... 38%
- Independent / Other* 19%

Q12 If you are Hispanic or Latino, press 1. If white, press 2. If African-American, press 3. If other, press 4.

- Hispanic / Latino* 17%
- White* 68%
- African American*..... 8%
- Other*..... 7%

Q13 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

- 18 to 45*..... 22%
- 46 to 65*..... 45%
- Older than 65*..... 32%





	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	75%	69%	80%	79%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	22%	15%	10%
Not sure	7%	9%	5%	10%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Wild Horses Should Be Protected From Slaughter Yes/No				
Think Nevada's wild horses should be protected from roundups and slaughter	75%	70%	79%	78%
Do not think Nevada's wild horses should be protected from roundups and slaughter	18%	22%	14%	15%
Not sure	8%	8%	7%	7%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Partnerships Can Protect Natural Resources Agree/Disagree				
Strongly agree	47%	50%	44%	52%
Somewhat agree	23%	23%	24%	19%
Somewhat disagree	8%	8%	9%	6%
Strongly disagree	7%	9%	6%	3%
Not sure	14%	10%	17%	20%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
State Should Partner with Nonprofits Agree/Disagree				
Strongly agree	53%	50%	55%	54%
Somewhat agree	19%	16%	20%	32%
Somewhat disagree	9%	14%	6%	4%
Strongly disagree	8%	12%	5%	3%
Not sure	11%	8%	14%	7%





	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Ag Dept Should Give Horses Away Agree/Disagree				
Strongly agree	16%	20%	14%	3%
Somewhat agree	7%	6%	8%	3%
Somewhat disagree	20%	16%	21%	31%
Strongly disagree	51%	49%	52%	55%
Not sure	7%	8%	6%	8%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Mustangs Are a Symbol and Should Be Protected Agree/Disagree				
Strongly agree	77%	70%	82%	81%
Somewhat agree	9%	8%	9%	12%
Somewhat disagree	5%	7%	4%	2%
Strongly disagree	6%	12%	2%	1%
Not sure	3%	3%	3%	4%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Informed State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	76%	69%	81%	80%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	21%	14%	10%
Not sure	7%	9%	5%	9%

	Base	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Best Approach to Managing Horses				
Humane birth control	75%	70%	79%	80%
Roundups and slaughter	14%	17%	14%	7%
Not sure	11%	13%	8%	13%





	Base	Gender	
		Wom...	Man
State Action on Wild Horses			
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	75%	76%	75%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	16%	18%
Not sure	7%	8%	7%

	Base	Gender	
		Wom...	Man
Wild Horses Should Be Protected From Slaughter Yes/No			
Think Nevada's wild horses should be protected from roundups and slaughter	75%	76%	73%
Do not think Nevada's wild horses should be protected from roundups and slaughter	18%	16%	19%
Not sure	8%	8%	7%

	Base	Gender	
		Wom...	Man
Partnerships Can Protect Natural Resources Agree/Disagree			
Strongly agree	47%	47%	48%
Somewhat agree	23%	22%	24%
Somewhat disagree	8%	8%	8%
Strongly disagree	7%	8%	7%
Not sure	14%	15%	13%

	Base	Gender	
		Wom...	Man
State Should Partner with Nonprofits Agree/Disagree			
Strongly agree	53%	57%	47%
Somewhat agree	19%	16%	22%
Somewhat disagree	9%	8%	11%
Strongly disagree	8%	8%	8%
Not sure	11%	10%	12%





	Base	Gender	
		Wom...	Man
Ag Dept Should Give Horses Away Agree/Disagree			
Strongly agree	16%	12%	19%
Somewhat agree	7%	6%	8%
Somewhat disagree	20%	20%	20%
Strongly disagree	51%	54%	47%
Not sure	7%	9%	6%

	Base	Gender	
		Wom...	Man
Mustangs Are a Symbol and Should Be Protected Agree/Disagree			
Strongly agree	77%	75%	78%
Somewhat agree	9%	9%	9%
Somewhat disagree	5%	5%	5%
Strongly disagree	6%	6%	7%
Not sure	3%	5%	1%

	Base	Gender	
		Wom...	Man
Informed State Action on Wild Horses			
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	76%	76%	76%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	16%	17%
Not sure	7%	8%	7%

	Base	Gender	
		Wom...	Man
Best Approach to Managing Horses			
Humane birth control	75%	73%	77%
Roundups and slaughter	14%	15%	14%
Not sure	11%	12%	9%





	Base	Party		
		Democrat	Republican	Independent / Other
State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	75%	81%	69%	74%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	14%	22%	16%
Not sure	7%	5%	9%	10%

	Base	Party		
		Democrat	Republican	Independent / Other
Wild Horses Should Be Protected From Slaughter Yes/No				
Think Nevada's wild horses should be protected from roundups and slaughter	75%	81%	69%	75%
Do not think Nevada's wild horses should be protected from roundups and slaughter	18%	14%	23%	16%
Not sure	8%	6%	9%	9%

	Base	Party		
		Democrat	Republican	Independent / Other
Partnerships Can Protect Natural Resources Agree/Disagree				
Strongly agree	47%	50%	44%	50%
Somewhat agree	23%	19%	33%	14%
Somewhat disagree	8%	7%	6%	14%
Strongly disagree	7%	5%	8%	9%
Not sure	14%	19%	9%	13%

	Base	Party		
		Democrat	Republican	Independent / Other
State Should Partner with Nonprofits Agree/Disagree				
Strongly agree	53%	59%	46%	54%
Somewhat agree	19%	15%	26%	15%
Somewhat disagree	9%	5%	11%	15%
Strongly disagree	8%	7%	10%	6%
Not sure	11%	15%	7%	11%





	Base	Party		
		Democrat	Republican	Independent / Other
Ag Dept Should Give Horses Away Agree/Disagree				
Strongly agree	16%	17%	16%	13%
Somewhat agree	7%	6%	9%	3%
Somewhat disagree	20%	18%	21%	19%
Strongly disagree	51%	54%	47%	53%
Not sure	7%	5%	7%	12%

	Base	Party		
		Democrat	Republican	Independent / Other
Mustangs Are a Symbol and Should Be Protected Agree/Disagree				
Strongly agree	77%	82%	71%	76%
Somewhat agree	9%	7%	12%	7%
Somewhat disagree	5%	4%	6%	6%
Strongly disagree	6%	5%	8%	5%
Not sure	3%	2%	3%	5%

	Base	Party		
		Democrat	Republican	Independent / Other
Informed State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	76%	84%	69%	73%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	12%	22%	17%
Not sure	7%	4%	10%	10%

	Base	Party		
		Democrat	Republican	Independent / Other
Best Approach to Managing Horses				
Humane birth control	75%	82%	70%	70%
Roundups and slaughter	14%	11%	19%	14%
Not sure	11%	8%	11%	16%





	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
State Action on Wild Horses					
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	75%	82%	72%	78%	84%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	15%	19%	17%	8%
Not sure	7%	2%	9%	5%	8%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Wild Horses Should Be Protected From Slaughter Yes/No					
Think Nevada's wild horses should be protected from roundups and slaughter	75%	78%	73%	81%	79%
Do not think Nevada's wild horses should be protected from roundups and slaughter	18%	13%	20%	15%	6%
Not sure	8%	8%	7%	3%	15%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Partnerships Can Protect Natural Resources Agree/Disagree					
Strongly agree	47%	34%	51%	43%	40%
Somewhat agree	23%	29%	21%	20%	39%
Somewhat disagree	8%	11%	8%	11%	1%
Strongly disagree	7%	-	9%	-	14%
Not sure	14%	25%	11%	27%	6%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
State Should Partner with Nonprofits Agree/Disagree					
Strongly agree	53%	46%	57%	48%	29%
Somewhat agree	19%	20%	17%	20%	35%
Somewhat disagree	9%	3%	9%	11%	19%
Strongly disagree	8%	3%	9%	10%	3%
Not sure	11%	28%	8%	12%	14%





	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Ag Dept Should Give Horses Away Agree/Disagree					
Strongly agree	16%	36%	14%	7%	8%
Somewhat agree	7%	4%	7%	5%	5%
Somewhat disagree	20%	23%	19%	34%	11%
Strongly disagree	51%	31%	53%	44%	70%
Not sure	7%	6%	7%	10%	5%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Mustangs Are a Symbol and Should Be Protected Agree/Disagree					
Strongly agree	77%	89%	74%	71%	91%
Somewhat agree	9%	7%	10%	3%	-
Somewhat disagree	5%	2%	6%	4%	2%
Strongly disagree	6%	1%	8%	6%	-
Not sure	3%	-	2%	16%	7%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Informed State Action on Wild Horses					
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	76%	81%	73%	79%	83%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	15%	18%	16%	6%
Not sure	7%	4%	8%	5%	11%

	Base	Race			
		Hispani- c / Lati...	White	African Americ...	Other
Best Approach to Managing Horses					
Humane birth control	75%	76%	74%	78%	76%
Roundups and slaughter	14%	14%	16%	13%	6%
Not sure	11%	10%	10%	9%	19%





	Base	Age		
		18 to 45	46 to 65	Older than ...
State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	75%	65%	78%	79%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	27%	16%	12%
Not sure	7%	7%	6%	10%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Wild Horses Should Be Protected From Slaughter Yes/No				
Think Nevada's wild horses should be protected from roundups and slaughter	75%	65%	76%	81%
Do not think Nevada's wild horses should be protected from roundups and slaughter	18%	24%	18%	12%
Not sure	8%	11%	6%	8%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Partnerships Can Protect Natural Resources Agree/Disagree				
Strongly agree	47%	38%	49%	51%
Somewhat agree	23%	20%	25%	23%
Somewhat disagree	8%	4%	10%	7%
Strongly disagree	7%	11%	7%	6%
Not sure	14%	27%	10%	13%

	Base	Age		
		18 to 45	46 to 65	Older than ...
State Should Partner with Nonprofits Agree/Disagree				
Strongly agree	53%	36%	58%	53%
Somewhat agree	19%	24%	17%	20%
Somewhat disagree	9%	4%	12%	8%
Strongly disagree	8%	14%	6%	8%
Not sure	11%	22%	7%	11%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Ag Dept Should Give Horses Away Agree/Disagree				
Strongly agree	16%	23%	15%	13%
Somewhat agree	7%	10%	3%	10%
Somewhat disagree	20%	16%	23%	18%
Strongly disagree	51%	43%	52%	53%
Not sure	7%	9%	7%	7%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Mustangs Are a Symbol and Should Be Protected Agree/Disagree				
Strongly agree	77%	64%	80%	77%
Somewhat agree	9%	15%	6%	10%
Somewhat disagree	5%	7%	3%	7%
Strongly disagree	6%	7%	7%	5%
Not sure	3%	7%	3%	2%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Informed State Action on Wild Horses				
Think the state should continue the non-profit partnership to protect and manage the Virginia Range wild horses	76%	66%	77%	81%
Think the state should transfer ownership to a private owner who could legally round the horses up and send them for slaughter	17%	28%	16%	11%
Not sure	7%	6%	7%	9%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Best Approach to Managing Horses				
Humane birth control	75%	59%	78%	81%
Roundups and slaughter	14%	29%	11%	9%
Not sure	11%	12%	10%	10%





Utah CD 2 Survey Results

Q1 Currently in the United States, wild horses are protected under federal law and slaughtering them is prohibited. Some in Congress are trying to overturn this ban to allow for mass slaughter of wild horses. Do you want Congress to continue the ban on horse slaughter OR overturn the ban and allow the slaughter of wild horses?

Want Congress to continue the ban on horse slaughter 63%
Want Congress to overturn the ban and allow the slaughter of wild horses 28%
Not sure 9%

Q2 By unanimous Act of Congress, wild horses and burros living on Western public lands have been protected as historic symbols of American freedom for nearly 50 years. But now, some in Congress propose to eliminate this protection, allowing for mass slaughter of more than 90,000 wild horses and the sale of wild horses to foreign slaughterhouses for human consumption. Do you think Congress should continue to protect wild horses from slaughter, or do you think we should end protections and allow slaughter of America's wild horses?

Prefer continuing protection of America's wild horses from slaughter 68%
Think we should end protections and allow slaughter of America's wild horses 27%
Not sure 5%

Q3 A 2013 study by the National Academy of Sciences concluded that administering birth control to wild horse herds provides an effective, humane and cost-effective way to manage America's wild horses. Nevertheless, some members of Congress want to abolish humane birth control as a method for controlling wild horse populations. This will increase current program costs for US taxpayers, and lead to the sale and slaughter of wild horses. Would you support or oppose the use of humane wild horse birth control programs instead of slaughtering wild horses?

Support the use of humane wild horse birth control as a means of controlling America's wild horse population 72%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population 19%
Not sure 9%

Q4 If your member of Congress were to support a measure that would allow the mass killing of wild horses and unrestricted sales of wild horses to foreign slaughterhouses, would you be less likely or more likely to support them, or would it not make a difference?

Less likely 57%
More likely 21%
Wouldn't make a difference 18%
Not sure 5%





Q5 Regardless of your position on horse slaughter, what do you think is the best reason for Congress to continue to protect wild horses: they're national symbols of freedom and part of the history of the American West; there's a proven, cost-effective and humane way to manage them; slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong; management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter; or something else?

- They're national symbols of freedom and part of the history of the American West* 33%
- There's a proven, cost-effective and humane way to manage them*..... 23%
- Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong* 8%
- Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter*..... 12%
- Something else* 19%
- Not sure* 4%

Q6 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, Libertarian Gary Johnson, Green Party candidate Jill Stein, or someone else?

- Donald Trump* 47%
- Hillary Clinton*..... 31%
- Gary Johnson* 4%
- Jill Stein* 0%
- Someone else*..... 17%

Q7 If you are a woman, press 1. If a man, press 2.

- Woman* 53%
- Man*..... 47%

Q8 If you are a Democrat, press 1. If a Republican, press 2. If an Independent, press 3.

- Democrat* 25%
- Republican*..... 52%
- Independent*..... 23%

Q9 If you are Hispanic, press 1. If white, press 2. If other, press 3.

- Hispanic*..... 10%
- White* 83%
- Other*..... 7%

Q10 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

- 18 to 45*..... 32%
- 46 to 65*..... 38%
- Older than 65*..... 30%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Continue or Overturn Ban on Horse Slaughter						
Want Congress to continue the ban on horse slaughter	63%	59%	70%	49%	100%	64%
Want Congress to overturn the ban and allow the slaughter of wild horses	28%	34%	19%	18%	-	33%
Not sure	9%	7%	11%	34%	-	3%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Congress Continue or End Protections for Horses						
Prefer continuing protection of America's wild horses from slaughter	68%	61%	76%	74%	100%	68%
Think we should end protections and allow slaughter of America's wild horses	27%	34%	19%	9%	-	30%
Not sure	5%	5%	5%	16%	-	2%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Horse Birth Control Support/Oppose						
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	72%	64%	82%	68%	100%	76%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	26%	12%	17%	-	12%
Not sure	9%	10%	6%	16%	-	13%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Representative Support Horse Slaughter Less/More Likely						
Less likely	57%	51%	66%	55%	100%	58%
More likely	21%	27%	16%	12%	-	14%
Wouldn't make a difference	18%	17%	15%	16%	-	27%
Not sure	5%	6%	4%	17%	-	2%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hnson	Jill Stein	Someon- e else
Best Reason to Protect Horses						
They're national symbols of freedom and part of the history of the American West	33%	37%	34%	28%	-	22%
There's a proven, cost-effective and humane way to manage them	23%	20%	28%	16%	100%	24%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	8%	6%	11%	33%	-	5%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	12%	10%	11%	15%	-	21%
Something else	19%	21%	13%	9%	-	26%
Not sure	4%	6%	3%	-	-	2%

	Base	Gender	
		Wom...	Man
Continue or Overturn Ban on Horse Slaughter			
Want Congress to continue the ban on horse slaughter	63%	65%	60%
Want Congress to overturn the ban and allow the slaughter of wild horses	28%	24%	33%
Not sure	9%	10%	7%

	Base	Gender	
		Wom...	Man
Congress Continue or End Protections for Horses			
Prefer continuing protection of America's wild horses from slaughter	68%	72%	63%
Think we should end protections and allow slaughter of America's wild horses	27%	23%	32%
Not sure	5%	5%	5%

	Base	Gender	
		Wom...	Man
Horse Birth Control Support/Oppose			
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	72%	75%	68%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	18%	19%
Not sure	9%	7%	12%





	Base	Gender	
		Wom...	Man
Representative Support Horse Slaughter Less/More Likely			
Less likely	57%	60%	53%
More likely	21%	21%	20%
Wouldn't make a difference	18%	15%	21%
Not sure	5%	4%	6%

	Base	Gender	
		Wom...	Man
Best Reason to Protect Horses			
They're national symbols of freedom and part of the history of the American West	33%	38%	28%
There's a proven, cost-effective and humane way to manage them	23%	26%	20%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	8%	6%	11%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	12%	9%	15%
Something else	19%	16%	22%
Not sure	4%	5%	3%

	Base	Party		
		Democr...	Republic...	Independe...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	63%	79%	53%	68%
Want Congress to overturn the ban and allow the slaughter of wild horses	28%	13%	36%	27%
Not sure	9%	8%	11%	5%

	Base	Party		
		Democr...	Republic...	Independe...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	68%	85%	58%	71%
Think we should end protections and allow slaughter of America's wild horses	27%	11%	37%	24%
Not sure	5%	4%	5%	5%





	Base	Party		
		Democr...	Republic...	Independe...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	72%	82%	64%	78%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	12%	25%	12%
Not sure	9%	6%	11%	9%

	Base	Party		
		Democr...	Republic...	Independe...
Representative Support Horse Slaughter Less/More Likely				
Less likely	57%	72%	47%	63%
More likely	21%	14%	26%	16%
Wouldn't make a difference	18%	10%	20%	19%
Not sure	5%	3%	7%	2%

	Base	Party		
		Democr...	Republic...	Independe...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	33%	37%	33%	30%
There's a proven, cost-effective and humane way to manage them	23%	20%	25%	22%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	8%	13%	5%	12%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	12%	18%	9%	13%
Something else	19%	10%	23%	20%
Not sure	4%	2%	6%	3%

	Base	Race		
		Hispa...	White	Other
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	63%	62%	63%	66%
Want Congress to overturn the ban and allow the slaughter of wild horses	28%	24%	29%	27%
Not sure	9%	14%	9%	7%





	Base	Race		
		Hispa...	White	Other
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	68%	78%	66%	69%
Think we should end protections and allow slaughter of America's wild horses	27%	20%	29%	21%
Not sure	5%	2%	5%	10%

	Base	Race		
		Hispa...	White	Other
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	72%	65%	72%	78%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	31%	18%	15%
Not sure	9%	4%	10%	6%

	Base	Race		
		Hispa...	White	Other
Representative Support Horse Slaughter Less/More Likely				
Less likely	57%	53%	57%	61%
More likely	21%	32%	20%	12%
Wouldn't make a difference	18%	8%	18%	22%
Not sure	5%	7%	5%	5%





	Base	Race		
		Hispa...	White	Other
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	33%	46%	32%	34%
There's a proven, cost-effective and humane way to manage them	23%	4%	26%	13%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	8%	4%	9%	7%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	12%	23%	10%	19%
Something else	19%	18%	19%	21%
Not sure	4%	4%	4%	5%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	63%	61%	63%	64%
Want Congress to overturn the ban and allow the slaughter of wild horses	28%	31%	28%	25%
Not sure	9%	8%	8%	11%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	68%	66%	68%	69%
Think we should end protections and allow slaughter of America's wild horses	27%	34%	25%	23%
Not sure	5%	-	7%	8%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	72%	65%	72%	78%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	22%	19%	16%
Not sure	9%	13%	9%	6%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Representative Support Horse Slaughter Less/More Likely				
Less likely	57%	58%	57%	55%
More likely	21%	23%	21%	18%
Wouldn't make a difference	18%	16%	18%	20%
Not sure	5%	3%	4%	7%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	33%	27%	34%	39%
There's a proven, cost-effective and humane way to manage them	23%	14%	27%	28%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	8%	7%	8%	10%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	12%	20%	8%	9%
Something else	19%	29%	18%	9%
Not sure	4%	3%	5%	5%





Nevada Survey Results

Q1 Currently in the United States, wild horses are protected under federal law and slaughtering them is prohibited. Some in Congress are trying to overturn this ban to allow for mass slaughter of wild horses. Do you want Congress to continue the ban on horse slaughter OR overturn the ban and allow the slaughter of wild horses?

- Want Congress to continue the ban on horse slaughter* 71%
- Want Congress to overturn the ban and allow the slaughter of wild horses* 19%
- Not sure* 9%

Q2 By unanimous Act of Congress, wild horses and burros living on Western public lands have been protected as historic symbols of American freedom for nearly 50 years. But now, some in Congress propose to eliminate this protection, allowing for mass slaughter of more than 90,000 wild horses and the sale of wild horses to foreign slaughterhouses for human consumption. Do you think Congress should continue to protect wild horses from slaughter, or do you think we should end protections and allow slaughter of America's wild horses?

- Prefer continuing protection of America's wild horses from slaughter* 78%
- Think we should end protections and allow slaughter of America's wild horses* 18%
- Not sure* 5%

Q3 A 2013 study by the National Academy of Sciences concluded that administering birth control to wild horse herds provides an effective, humane and cost-effective way to manage America's wild horses. Nevertheless, some members of Congress want to abolish humane birth control as a method for controlling wild horse populations. This will increase current program costs for US taxpayers, and lead to the sale and slaughter of wild horses. Would you support or oppose the use of humane wild horse birth control programs instead of slaughtering wild horses?

- Support the use of humane wild horse birth control as a means of controlling America's wild horse population* 74%
- Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population* 19%
- Not sure* 6%

Q4 If your member of Congress were to support a measure that would allow the mass killing of wild horses and unrestricted sales of wild horses to foreign slaughterhouses, would you be less likely or more likely to support them, or would it not make a difference?

- Less likely* 63%
- More likely* 17%
- Wouldn't make a difference* 15%
- Not sure* 5%





Q5 Regardless of your position on horse slaughter, what do you think is the best reason for Congress to continue to protect wild horses: they're national symbols of freedom and part of the history of the American West; there's a proven, cost-effective and humane way to manage them; slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong; management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter; or something else?

- They're national symbols of freedom and part of the history of the American West* 42%
- There's a proven, cost-effective and humane way to manage them*..... 25%
- Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong* 10%
- Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter*..... 10%
- Something else* 10%
- Not sure* 4%

Q6 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, Libertarian Gary Johnson, Green Party candidate Jill Stein, or someone else?

- Donald Trump* 42%
- Hillary Clinton*..... 45%
- Gary Johnson* 3%
- Jill Stein* 1%
- Someone else*..... 9%

Q7 If you are a woman, press 1. If a man, press 2.

- Woman* 53%
- Man*..... 47%

Q8 If you are a Democrat, press 1. If a Republican, press 2. If an Independent, press 3.

- Democrat* 42%
- Republican*..... 36%
- Independent*..... 22%

Q9 If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

- Hispanic*..... 17%
- White* 67%
- African American*..... 8%
- Other*..... 8%

Q10 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

- 18 to 45*..... 27%
- 46 to 65*..... 40%
- Older than 65*..... 33%

Q11 Congressional District

- 1*..... 17%
- 2*..... 29%
- 3*..... 29%
- 4*..... 25%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Continue or Overturn Ban on Horse Slaughter						
Want Congress to continue the ban on horse slaughter	71%	71%	78%	65%	77%	44%
Want Congress to overturn the ban and allow the slaughter of wild horses	19%	21%	16%	31%	20%	24%
Not sure	9%	8%	7%	4%	3%	32%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Congress Continue or End Protections for Horses						
Prefer continuing protection of America's wild horses from slaughter	78%	76%	82%	69%	77%	65%
Think we should end protections and allow slaughter of America's wild horses	18%	19%	14%	22%	23%	32%
Not sure	5%	5%	4%	8%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Horse Birth Control Support/Oppose						
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	74%	73%	81%	79%	11%	48%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	19%	22%	13%	15%	89%	33%
Not sure	6%	5%	6%	6%	-	19%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Representative Support Horse Slaughter Less/More Likely						
Less likely	63%	66%	65%	57%	77%	41%
More likely	17%	19%	16%	31%	14%	2%
Wouldn't make a difference	15%	11%	11%	10%	9%	52%
Not sure	5%	3%	8%	1%	-	5%





National Survey Results

Q1 Currently in the United States, wild horses are protected under federal law and slaughtering them is prohibited. Some in Congress are trying to overturn this ban to allow for mass slaughter of wild horses. Do you want Congress to continue the ban on horse slaughter OR overturn the ban and allow the slaughter of wild horses?

Want Congress to continue the ban on horse slaughter 75%
Want Congress to overturn the ban and allow the slaughter of wild horses 18%
Not sure 7%

Q2 By unanimous Act of Congress, wild horses and burros living on Western public lands have been protected as historic symbols of American freedom for nearly 50 years. But now, some in Congress propose to eliminate this protection, allowing for mass slaughter of more than 90,000 wild horses and the sale of wild horses to foreign slaughterhouses for human consumption. Do you think Congress should continue to protect wild horses from slaughter, or do you think we should end protections and allow slaughter of America's wild horses?

Prefer continuing protection of America's wild horses from slaughter 80%
Think we should end protections and allow slaughter of America's wild horses 15%
Not sure 6%

Q3 A 2013 study by the National Academy of Sciences concluded that administering birth control to wild horse herds provides an effective, humane and cost-effective way to manage America's wild horses. Nevertheless, some members of Congress want to abolish humane birth control as a method for controlling wild horse populations. This will increase current program costs for US taxpayers, and lead to the sale and slaughter of wild horses. Would you support or oppose the use of humane wild horse birth control programs instead of slaughtering wild horses?

Support the use of humane wild horse birth control as a means of controlling America's wild horse population 76%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population 15%
Not sure 9%

Q4 If your member of Congress were to support a measure that would allow the mass killing of wild horses and unrestricted sales of wild horses to foreign slaughterhouses, would you be less likely or more likely to support them, or would it not make a difference?

Less likely 65%
More likely 12%
Wouldn't make a difference 15%
Not sure 8%





Q5 Regardless of your position on horse slaughter, what do you think is the best reason for Congress to continue to protect wild horses: they're national symbols of freedom and part of the history of the American West; there's a proven, cost-effective and humane way to manage them; slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong; management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter; or something else?

- They're national symbols of freedom and part of the history of the American West* 41%
- There's a proven, cost-effective and humane way to manage them*..... 24%
- Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong* 12%
- Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter*..... 9%
- Something else* 10%
- Not sure* 4%

Q6 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, Libertarian Gary Johnson, Green Party candidate Jill Stein, or someone else?

- Donald Trump* 44%
- Hillary Clinton*..... 45%
- Gary Johnson* 3%
- Jill Stein* 1%
- Someone else*..... 7%

Q7 If you are a woman, press 1. If a man, press 2.

- Woman* 53%
- Man*..... 47%

Q8 If you are a Democrat, press 1. If a Republican, press 2. If an Independent, press 3.

- Democrat* 43%
- Republican*..... 32%
- Independent*..... 24%

Q9 If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

- Hispanic*..... 9%
- White* 74%
- African-American* 12%
- Other*..... 5%

Q10 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

- 18 to 45*..... 34%
- 46 to 65*..... 36%
- Older than 65*..... 30%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Continue or Overturn Ban on Horse Slaughter						
Want Congress to continue the ban on horse slaughter	75%	78%	73%	70%	83%	58%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	14%	20%	13%	17%	38%
Not sure	7%	8%	7%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Congress Continue or End Protections for Horses						
Prefer continuing protection of America's wild horses from slaughter	80%	86%	77%	70%	83%	58%
Think we should end protections and allow slaughter of America's wild horses	15%	9%	17%	13%	17%	38%
Not sure	6%	5%	6%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Horse Birth Control Support/Oppose						
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	74%	82%	56%	83%	52%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	15%	10%	15%	17%	40%
Not sure	9%	11%	7%	29%	-	8%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Representative Support Horse Slaughter Less/More Likely						
Less likely	65%	69%	65%	35%	68%	45%
More likely	12%	9%	10%	13%	17%	41%
Wouldn't make a difference	15%	15%	16%	17%	15%	7%
Not sure	8%	7%	8%	35%	-	7%



National Survey Results

Q1 Wild Free-Roaming Horses and Burros are one of two animals protected under federal law as national symbols of freedom. But now a plan is being pushed by livestock industry lobbyists and other special interests to round up and remove on a massive scale virtually all remaining wild horses that are currently roaming freely on public lands in the West. I'm going to read you some statements about the plan and ask you to tell me if you strongly support, somewhat support, somewhat oppose, or strongly oppose provisions of the plan. Here's the first one: The plan calls for the removal of more than two-thirds of the wild horse and burro populations living free today on public lands, reducing them to near extinction levels. Having heard this, do you strongly support, somewhat support, somewhat oppose, strongly oppose, or have no opinion on the mass removal of wild horses and burros from public lands?

<i>Strongly support</i>	7%
<i>Somewhat support</i>	8%
<i>Somewhat oppose</i>	14%
<i>Strongly oppose</i>	60%
<i>No opinion</i>	9%
<i>Not sure</i>	3%

Q2 Here's the next one: Once captured, most of the horses will be held in pens and pastures at a cost to taxpayers of hundreds of millions of dollars over the next decade. Wild horse groups are concerned that Congress will authorize the slaughter of the horses when it becomes too expensive to hold them. Having heard this, do you strongly support, somewhat support, somewhat oppose, strongly oppose, or have no opinion on the mass removal of wild horses and burros from public lands?

<i>Strongly support</i>	5%
<i>Somewhat support</i>	8%
<i>Somewhat oppose</i>	11%
<i>Strongly oppose</i>	67%
<i>No opinion</i>	7%
<i>Not sure</i>	2%



Q3 Here's the next one: Critics say this new plan was created to benefit the corporate cattle industry, which views wild horses as competition for cheap, taxpayer-subsidized grazing on public lands. Commercial livestock grazing on public lands costs taxpayers as much as \$500 million per year but produces less than 2 percent of America's beef. Having heard this, do you strongly support, somewhat support, somewhat oppose, strongly oppose, or have no opinion on the mass removal of wild horses and burros from public lands to further subsidize the commercial livestock industry?

<i>Strongly support</i>	5%
<i>Somewhat support</i>	8%
<i>Somewhat oppose</i>	14%
<i>Strongly oppose</i>	60%
<i>No opinion</i>	11%
<i>Not sure</i>	2%

Q4 Here's another one: The plan allows wild horses that remain free to be surgically sterilized. This involves forcibly removing the ovaries of mares through a painful surgical procedure that the National Academy of Sciences warns is "inadvisable for a field setting" due to the risk of bleeding and infection. Having heard this, do you strongly support, somewhat support, somewhat oppose, strongly oppose, or have no opinion on the surgical sterilization of wild horses and burros that are left on the range?

<i>Strongly support</i>	7%
<i>Somewhat support</i>	5%
<i>Somewhat oppose</i>	15%
<i>Strongly oppose</i>	64%
<i>No opinion</i>	8%
<i>Not sure</i>	2%

Q5 A safe and non-invasive alternative to risky surgical sterilization is a scientifically proven fertility control vaccine that can be delivered to female horses non-invasively by darting. This vaccine has been proven to successfully manage population growth while maintaining the natural behaviors wild horses need to survive and thrive. Knowing that this alternative exists, do you support the use of humane fertility control vaccines instead of invasive procedures to manage wild herds, or not?

<i>Support</i>	54%
<i>Oppose</i>	21%
<i>Not sure</i>	25%

Q6 After hearing more about this new proposed plan for massive removal of America's wild horses from public lands, do you think groups that raise money to protect animals and rescue wild horses should support or oppose the plan?

<i>Think they should support it</i>	20%
<i>Think they should oppose it</i>	55%
<i>Not sure</i>	25%

Q7 After hearing more about this new proposed plan for massive removal of America's wild horse population from public lands, do you support or oppose the plan?

<i>Support</i>	12%
<i>Oppose</i>	71%
<i>Not sure</i>	17%

Q8 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, someone else, or did you not vote in the election?

<i>Donald Trump</i>	44%
<i>Hillary Clinton</i>	46%
<i>Someone else / Did not vote</i>	10%



Q9 If you are a woman, press 1. If a man, press 2.
If other, press 3.

Woman 52%
Man..... 46%
Other..... 3%

Q10 If you are a Democrat, press 1. If a Republican,
press 2. If independent, press 3.

Democrat 43%
Republican..... 34%
Independent..... 23%

Q11 If you are Hispanic or Latino, press 1. If white,
press 2. If African-American, press 3. If other,
press 4.

Hispanic / Latino 9%
White 73%
African-American 12%
Other..... 6%

Q12 If you are 18-45 years old, press 1. If 46-65,
press 2. If older than 65, press 3.

18 to 45..... 36%
46 to 65..... 38%
Older than 65..... 26%

Q13 Mode

Phone 62%
Text..... 38%



	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose				
Strongly support	7%	10%	4%	7%
Somewhat support	8%	10%	6%	3%
Somewhat oppose	14%	16%	12%	12%
Strongly oppose	60%	49%	69%	69%
No opinion	9%	11%	7%	5%
Not sure	3%	3%	2%	4%

	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose				
Strongly support	5%	10%	1%	6%
Somewhat support	8%	8%	8%	4%
Somewhat oppose	11%	15%	8%	9%
Strongly oppose	67%	58%	74%	71%
No opinion	7%	8%	7%	6%
Not sure	2%	2%	1%	4%

	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose				
Strongly support	5%	8%	3%	6%
Somewhat support	8%	11%	5%	7%
Somewhat oppose	14%	17%	11%	9%
Strongly oppose	60%	48%	71%	64%
No opinion	11%	13%	9%	11%
Not sure	2%	3%	2%	3%

	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose				
Strongly support	7%	9%	4%	5%
Somewhat support	5%	5%	6%	2%
Somewhat oppose	15%	17%	12%	19%
Strongly oppose	64%	57%	70%	64%
No opinion	8%	9%	6%	7%
Not sure	2%	2%	1%	2%





	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose				
Support	54%	48%	59%	56%
Oppose	21%	23%	19%	17%
Not sure	25%	29%	21%	27%

	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Think Groups That Protect Wild Horses Should Support / Oppose Plan				
Think they should support it	20%	24%	16%	17%
Think they should oppose it	55%	46%	64%	53%
Not sure	25%	30%	20%	29%

	Bas- e	2016 Vote		
		Donal- d Tru...	Hillary Clint...	Someone els- e / Did not v...
Informed Plan for Massive Removal of Wild Horses Support / Oppose				
Support	12%	19%	7%	7%
Oppose	71%	60%	81%	71%
Not sure	17%	21%	11%	23%

	Bas- e	Gender		
		Wom...	Man	Oth...
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose				
Strongly support	7%	8%	5%	12%
Somewhat support	8%	5%	10%	15%
Somewhat oppose	14%	12%	15%	16%
Strongly oppose	60%	66%	54%	53%
No opinion	9%	7%	11%	4%
Not sure	3%	2%	4%	-





	Bas- e	Gender		
		Wom...	Man	Oth...
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose				
Strongly support	5%	6%	5%	-
Somewhat support	8%	7%	8%	15%
Somewhat oppose	11%	9%	14%	14%
Strongly oppose	67%	70%	63%	63%
No opinion	7%	6%	8%	8%
Not sure	2%	1%	2%	-

	Bas- e	Gender		
		Wom...	Man	Oth...
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose				
Strongly support	5%	6%	4%	5%
Somewhat support	8%	5%	11%	-
Somewhat oppose	14%	12%	15%	12%
Strongly oppose	60%	64%	57%	51%
No opinion	11%	11%	9%	32%
Not sure	2%	2%	3%	-

	Bas- e	Gender		
		Wom...	Man	Oth...
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose				
Strongly support	7%	8%	5%	3%
Somewhat support	5%	4%	7%	9%
Somewhat oppose	15%	12%	18%	26%
Strongly oppose	64%	67%	60%	57%
No opinion	8%	7%	8%	5%
Not sure	2%	2%	2%	-

	Bas- e	Gender		
		Wom...	Man	Oth...
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose				
Support	54%	57%	52%	44%
Oppose	21%	18%	23%	23%
Not sure	25%	24%	25%	33%





	Bas- e	Gender		
		Wom...	Man	Oth...
Think Groups That Protect Wild Horses Should Support / Oppose Plan				
Think they should support it	20%	21%	19%	6%
Think they should oppose it	55%	54%	57%	46%
Not sure	25%	24%	25%	48%

	Bas- e	Gender		
		Wom...	Man	Oth...
Informed Plan for Massive Removal of Wild Horses Support / Oppose				
Support	12%	10%	14%	23%
Oppose	71%	74%	69%	43%
Not sure	17%	15%	17%	34%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose				
Strongly support	7%	7%	8%	5%
Somewhat support	8%	7%	12%	3%
Somewhat oppose	14%	10%	16%	18%
Strongly oppose	60%	67%	54%	58%
No opinion	9%	8%	8%	12%
Not sure	3%	2%	3%	4%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose				
Strongly support	5%	5%	7%	4%
Somewhat support	8%	9%	10%	2%
Somewhat oppose	11%	6%	15%	16%
Strongly oppose	67%	72%	60%	65%
No opinion	7%	8%	5%	9%
Not sure	2%	0%	2%	4%





	Bas- e	Party		
		Democr...	Republic...	Independe...
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose				
Strongly support	5%	7%	6%	3%
Somewhat support	8%	7%	12%	4%
Somewhat oppose	14%	10%	14%	19%
Strongly oppose	60%	65%	54%	61%
No opinion	11%	10%	11%	10%
Not sure	2%	1%	3%	4%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose				
Strongly support	7%	10%	6%	2%
Somewhat support	5%	5%	6%	5%
Somewhat oppose	15%	10%	20%	16%
Strongly oppose	64%	68%	58%	65%
No opinion	8%	8%	7%	8%
Not sure	2%	1%	3%	3%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose				
Support	54%	61%	44%	56%
Oppose	21%	18%	26%	17%
Not sure	25%	21%	29%	27%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Think Groups That Protect Wild Horses Should Support / Oppose Plan				
Think they should support it	20%	24%	21%	10%
Think they should oppose it	55%	56%	53%	56%
Not sure	25%	19%	26%	34%

	Bas- e	Party		
		Democr...	Republic...	Independe...
Informed Plan for Massive Removal of Wild Horses Support / Oppose				
Support	12%	15%	13%	6%
Oppose	71%	74%	68%	70%
Not sure	17%	11%	19%	24%





	Bas-e	Race			
		Hispani-c / Lati...	Whit-e	African-Americ...	Othe-r
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose					
Strongly support	7%	11%	7%	6%	4%
Somewhat support	8%	4%	6%	19%	16%
Somewhat oppose	14%	3%	15%	16%	11%
Strongly oppose	60%	80%	60%	49%	49%
No opinion	9%	2%	9%	9%	10%
Not sure	3%	-	3%	-	10%

	Bas-e	Race			
		Hispani-c / Lati...	Whit-e	African-Americ...	Othe-r
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose					
Strongly support	5%	15%	5%	-	4%
Somewhat support	8%	4%	5%	22%	17%
Somewhat oppose	11%	2%	13%	6%	11%
Strongly oppose	67%	75%	68%	59%	49%
No opinion	7%	4%	7%	13%	9%
Not sure	2%	-	1%	-	10%

	Bas-e	Race			
		Hispani-c / Lati...	Whit-e	African-Americ...	Othe-r
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose					
Strongly support	5%	15%	4%	9%	4%
Somewhat support	8%	2%	7%	16%	11%
Somewhat oppose	14%	6%	16%	10%	6%
Strongly oppose	60%	66%	61%	56%	51%
No opinion	11%	9%	10%	10%	18%
Not sure	2%	2%	2%	-	10%

	Bas-e	Race			
		Hispani-c / Lati...	Whit-e	African-Americ...	Othe-r
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose					
Strongly support	7%	18%	4%	13%	4%
Somewhat support	5%	-	6%	6%	5%
Somewhat oppose	15%	8%	14%	14%	34%
Strongly oppose	64%	72%	67%	55%	36%
No opinion	8%	3%	7%	12%	10%
Not sure	2%	-	2%	-	10%





	Bas- e	Race			
		Hispani- c / Lati...	Whit- e	African- Americ...	Othe- r
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose					
Support	54%	44%	58%	43%	52%
Oppose	21%	24%	19%	27%	20%
Not sure	25%	32%	23%	31%	28%

	Bas- e	Race			
		Hispani- c / Lati...	Whit- e	African- Americ...	Othe- r
Think Groups That Protect Wild Horses Should Support / Oppose Plan					
Think they should support it	20%	25%	18%	31%	5%
Think they should oppose it	55%	53%	58%	40%	53%
Not sure	25%	22%	24%	28%	41%

	Bas- e	Race			
		Hispani- c / Lati...	Whit- e	African- Americ...	Othe- r
Informed Plan for Massive Removal of Wild Horses Support / Oppose					
Support	12%	11%	12%	13%	20%
Oppose	71%	71%	73%	67%	60%
Not sure	17%	18%	16%	20%	20%

	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose				
Strongly support	7%	10%	3%	8%
Somewhat support	8%	9%	6%	9%
Somewhat oppose	14%	12%	15%	15%
Strongly oppose	60%	59%	63%	57%
No opinion	9%	7%	10%	9%
Not sure	3%	3%	3%	2%





	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose				
Strongly support	5%	9%	2%	5%
Somewhat support	8%	10%	6%	7%
Somewhat oppose	11%	11%	12%	11%
Strongly oppose	67%	65%	68%	67%
No opinion	7%	4%	9%	8%
Not sure	2%	0%	3%	2%

	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose				
Strongly support	5%	8%	3%	6%
Somewhat support	8%	11%	6%	6%
Somewhat oppose	14%	12%	15%	14%
Strongly oppose	60%	59%	63%	58%
No opinion	11%	8%	10%	14%
Not sure	2%	1%	3%	2%

	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose				
Strongly support	7%	10%	3%	7%
Somewhat support	5%	5%	6%	4%
Somewhat oppose	15%	19%	12%	13%
Strongly oppose	64%	59%	67%	66%
No opinion	8%	5%	9%	9%
Not sure	2%	1%	3%	1%

	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose				
Support	54%	45%	58%	62%
Oppose	21%	25%	20%	15%
Not sure	25%	29%	22%	23%





	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Think Groups That Protect Wild Horses Should Support / Oppose Plan				
Think they should support it	20%	20%	17%	23%
Think they should oppose it	55%	59%	56%	49%
Not sure	25%	21%	27%	28%

	Bas- e	Age		
		18 t- o 45	46 t- o 65	Older than ...
Informed Plan for Massive Removal of Wild Horses Support / Oppose				
Support	12%	20%	7%	10%
Oppose	71%	65%	76%	72%
Not sure	17%	16%	17%	18%

	Bas- e	Mode	
		Pho...	Text
Plan Would Reduce Wild Horse Populations to Near Extinction Support / Oppose			
Strongly support	7%	9%	3%
Somewhat support	8%	10%	4%
Somewhat oppose	14%	15%	11%
Strongly oppose	60%	56%	66%
No opinion	9%	8%	10%
Not sure	3%	2%	4%

	Bas- e	Mode	
		Pho...	Text
Plan Would Be Costly to Taxpayers and Result in Slaughter of Horses Support / Oppose			
Strongly support	5%	7%	3%
Somewhat support	8%	10%	4%
Somewhat oppose	11%	13%	9%
Strongly oppose	67%	62%	74%
No opinion	7%	7%	8%
Not sure	2%	2%	2%





	Bas- e	Mode	
		Pho...	Text
Critics Say Plan Created to Benefit Corporate Cattle Industry Support / Oppose			
Strongly support	5%	7%	3%
Somewhat support	8%	9%	6%
Somewhat oppose	14%	13%	14%
Strongly oppose	60%	57%	65%
No opinion	11%	12%	9%
Not sure	2%	2%	3%

	Bas- e	Mode	
		Pho...	Text
Plan Allows Remaining Wild Horses to be Surgically Sterilized Support / Oppose			
Strongly support	7%	9%	2%
Somewhat support	5%	6%	3%
Somewhat oppose	15%	13%	18%
Strongly oppose	64%	63%	66%
No opinion	8%	7%	8%
Not sure	2%	1%	3%

	Bas- e	Mode	
		Pho...	Text
Safe and Non-Invasive Alternative to Surgical Sterilization Support / Oppose			
Support	54%	56%	52%
Oppose	21%	19%	23%
Not sure	25%	25%	25%

	Bas- e	Mode	
		Pho...	Text
Think Groups That Protect Wild Horses Should Support / Oppose Plan			
Think they should support it	20%	24%	13%
Think they should oppose it	55%	48%	67%
Not sure	25%	28%	20%



	Bas- e	Mode	
		Pho...	Text
Informed Plan for Massive Removal of Wild Horses Support / Oppose			
Support	12%	14%	10%
Oppose	71%	70%	72%
Not sure	17%	16%	18%

October 28, 2019

The Honorable David Bernhardt
Secretary, U.S. Department of Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Bernhardt,

We, the undersigned veterinarians, write today to express our concern with the Bureau of Land Management's (BLM) continued interest in pursuing the study of the surgical sterilization procedure known as "ovariectomy via colpotomy" on wild horses. While we understand the BLM's need to manage populations of wild horses, we are concerned about the agency's chosen method for study when more humane methods are already available. As such, we urge the BLM to abandon any future plans to pursue the experimental study of this procedure on wild mares.

Not only is ovariectomy via colpotomy far more invasive, inhumane, and risky than other non-surgical methods of fertility control, it is also more invasive and inhumane than the techniques that veterinarians use on domestic horses in the rare circumstances where some form of ovariectomy is clinically necessary.

The BLM's continued focus on conducting experiments studying ovariectomy via colpotomy raises serious concerns. Ovariectomy via colpotomy is a painful surgical procedure done blindly through an incision in the vagina, allowing access into the abdominal cavity for a rod-like tool, called an ecrasure, to sever and remove the ovaries. This procedure can be dangerous when performed on domestic horses, let alone wild horses whose response to sedatives and analgesics is much less predictable. Even in a controlled setting, this procedure can be accompanied by a high rate of complications, sometimes as high as 4 percent, including risks of infection, trauma, post-operative pain, hemorrhage, abdominal adhesions, evisceration, abscess formation, abortion, neuropathies, and even death. Indeed, part of BLM's own experimental goals include seeking to quantify morbidity and mortality.

The use of this procedure, in the manner that the BLM has proposed to study its efficacy and safety since 2016, is especially disconcerting given that the BLM does not intend to provide postoperative antibiotics and has stated that no veterinary interventions will be undertaken for any recovering horses once returned to the range. The associated risks are exacerbated by the fact that, by the agency's own admission, the surgeries will be conducted in an operating space that "may not be entirely sterile" at the agency's corrals. Following the experiments, the BLM intends to conduct the procedure on mares held in trap sites on the range, under conditions that are even less controlled and sterile than in the holding pens.

The National Academy of Sciences (NAS), in a 2013 report commissioned by the BLM, explicitly warned the agency against employing ovariectomy via colpotomy on wild horses. As stated in the report, "the possibility that ovariectomy may be followed by prolonged bleeding or

peritoneal infection makes it inadvisable for field application.” Similarly, in 2015, an NAS research review panel warned that conducting the procedure on wild (vs. domestic) horses could cause the “mortality rate to be higher than the 1% reported in the published literature” and stated that proposals for less invasive sterilization methods “would be safer – with less risk of hemorrhage and evisceration – and probably less painful.”

Further, the American College of Veterinary Surgeons (ACVS) describes laparoscopic surgery as the best method for ovariectomy, noting that “with the advent of laparoscopic (keyhole) surgery, all other techniques have become relatively dated.” The ACVS explains that laparoscopic surgery provides far greater “visualization and access” and is “minimally invasive,” especially in comparison to ovariectomy via colpotomy, which involves removing the ovaries “with a crushing-type instrument.” Put plainly, more humane surgical options exist (to say nothing of non-invasive immunocontraceptive vaccines or new research into intrauterine devices) that the BLM could consider for study.

Finally, two major academic institutions, Oregon State University (OSU) and Colorado State University (CSU), terminated partnerships with the BLM to provide veterinary observation and minimal welfare oversight for past iterations of the ovariectomy experiments. Yet, the BLM continues to pursue research proposals to study this procedure even in the absence of such outside veterinary and behavioral expertise. As federal lawmakers noted earlier this year when criticizing the BLM’s aggressive plan to move forward with the ovariectomy experiments, “at an absolute minimum, independent veterinary and welfare oversight (not unlike what we presume the BLM was hoping to achieve through partnerships with CSU, and before that, OSU) is necessary if a project of this type is to move forward in any respect.”

We hope the BLM will reconsider this misguided plan and ultimately stop any future pursuit of this archaic and inhumane procedure. As veterinarians, we swore an oath to uphold the welfare of all animals and work to prevent needless suffering. For the reasons discussed above, we call upon you to reevaluate the proposed surgery in light of the inability to provide wild horses with the required aftercare, pain management, and sterile conditions necessary to ensure their health and wellbeing. We urge you to direct the BLM to drop any further consideration of ovariectomy via colpotomy procedures for wild horses on the range.

Thank you for your consideration.

Sincerely,

Arlo Andersen, DVM
Massachusetts

Amy Marder, DVM
Massachusetts

Arlo Bane, DVM
Illinois

Barbara M. Peterson, DVM
Illinois

Barbara Schmidt, DVM
Alaska

Bernard Rollin, PhD
Colorado

Becky Jessup, DVM
Montana

Bernhard Mayer, DVM
Louisiana

Brenda Hemken, DVM
Illinois

Byron Mass, DVM
Oregon

Carla Rasmussen, DVM
Washington

Carol Buchanan, DVM
Texas

Charles Brown, DVM
New York

Charles Westfield, DVM
New Jersey

Chris Miller, DVM
Washington, DC

Christopher Puzio, DVM
New York

Clinton Pohl, DVM
Texas

David Stansfield, BVSC
North Carolina

Donna Burge, DVM
Virginia

Donna Peck, DVM
New Hampshire

Ed Schantzler, DVM
New York

Elizabeth Koskenmaki, DVM
California

Eugenia Nieto, DVM
California

Gail S. Wolfe, DVM
Michigan

Gary Block, DVM
Rhode Island

Gigi Gaulin, DVM
Georgia

Heather R. Garland, DVM
North Carolina

J Ken Leaman, DVM
Washington

Ja Wilson, DVM
Oregon

James Mancuso, DVM
New York

Jana Tuckerman, DVM
Ohio

Jennifer Enger, DVM
Connecticut

Jennifer Maas, DVM
Massachusetts

Jerry Dorsam, DVM
Colorado

Jo Michaelson, DVM
Connecticut

John E. Russell, DVM
Texas

Julia N. Allen, PhD, DVM
Washington

Julie Ryan, DVM
California

Katherine Johnson, DVM
Washington

Kathleen Smiler, DVM
Michigan

Kathryn Glendrange, DVM
California

Kathryn Denzine, DVM
Illinois

Kelly Palm, DVM
California

Kenneth Litwak, PhD, DVM
Ohio

Kevin Dralle, DVM
New Mexico

Kira Packan, DVM
North Carolina

Krista Lorenz, DVM
Montana

Leonard Marcus, DVM
Massachusetts

Linda Wolf, DVM
Minnesota

Linda Vukovich, DVM
Illinois

Lindsay Batson, DVM
North Carolina

Lisa Anderson, DVM
New Hampshire

Lisa Grim, DVM
California

Lisa Jacobson, DVM
Colorado

Lisa Lewis, DVM
North Carolina

Lisa White, DVM
Tennessee

Lynae Davis, DVM
Tennessee

Maci Paden, DVM
Washington

Marci L. Sauls, DVM
South Carolina

Marcy Rosendale, DVM
California

Mark Meddleton, DVM
New Mexico

Mary Kraeszig, DVM
Indiana

Meg Williams, DVM
Illinois

Michael O'Connor, DVM
California

Michael Widener, DVM
Washington

Nathan Keefer, DVM
California

Nena Winand, DVM
New York

Pamela Corey, DVM
New York

Patricia Hogan, DVM
New Jersey

Patricia A. Zinna, DVM
New Jersey

Penny Serio, DVM
Louisiana

Shauna Roberts, DVM
Illinois

Susan Tasillo, DVM
Colorado

Sylvia Heerens, DVM
New Jersey

Tiffany Diab, DVM
Colorado

Timothy Schacht, DVM
Michigan

Viktor Reinhardt, PhD, DVM
California

Wendy Leich, DVM
New Jersey

Yolanda Skinner, DVM
Louisiana



Congress of the United States
House of Representatives
Washington, DC 20515

June 21, 2019

The Honorable David Bernhardt
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Bernhardt:

We write today to express our concern with the Bureau of Land Management's (BLM) proposed surgical sterilization experiment to be conducted on wild horses in the Warm Springs Herd Management Area in Oregon (DOI-BLM-ORWA-B 050-2019-0013-EA (Spay Feasibility and On-Range Outcomes Environmental Assessment)).

While we understand the BLM's need to manage populations of wild horses, we are concerned about the rationale behind the decision to employ the "ovariectomy via colpotomy" method as a means of mass sterilization and are seeking clarification as to whether the agency has taken into account some of the unusual circumstances and disconcerting factors surrounding this project. In light of the November 2018 federal court ruling against the BLM, effectively blocking the agency from conducting the prior iteration of these experiments due to concerns over potential First Amendment public observation rights violations and because certain changes to the experimental protocol appeared arbitrary and capricious^[1], we would urge the BLM to abandon plans to pursue these experiments.

In its comprehensive 2013 report outlining strategies for improving wild horse management in the United States, the National Academy of Sciences (NAS) explicitly warned against employing ovariectomy via colpotomy on wild horses, noting that the "possibility that ovariectomy may be followed by prolonged bleeding or peritoneal infection makes it inadvisable for field application."^[2] In 2015, a NAS panel charged with considering various research proposals recommended against funding an ovariectomy via colpotomy project, noting that the procedure did not warrant further research, while also indicating that complication rates may be higher than expected.

It is our understanding the current proposal is substantially similar to, and indeed attempts to revive portions of, the discarded 2016 (DOI-BLM-OR-B000-2015-0055-EA) and 2018 (DOI-

BLM-ORWA-B050-2018-0016-EA) proposals on which the BLM sought to partner first with Oregon State University (OSU) and then with Colorado State University (CSU) in conducting and overseeing surgical sterilization experiments on wild horses.

In 2016, OSU withdrew from this project, leading the BLM to find a new academic institution – Colorado State University – to partner with for the 2018 proposal. CSU’s experts were slated to monitor the procedure and provide follow-up welfare assessments of the horses that underwent the surgery. However, on August 8, 2018, CSU terminated its partnership with the BLM in conducting the ovariectomy research study such that the university would no longer be involved in any capacity. On August 22, 2018, the BLM announced it would move forward with the project regardless, dropping plans to partner with an academic institution to help oversee and carry out the experiment and issuing a revised Environmental Assessment without the CSU components. On November 13, 2018, a U.S. District Court granted a preliminary injunction halting the project for the aforementioned reasons, and later that month the Interior Board of Land Appeals formally vacated the Decision Record authorizing the experiments. Indeed, in a positive turn of events, the BLM announced in February of 2019 that it planned to return some of the rounded-up horses to the range and administer scientifically-proven immunocontraceptive vaccines to stabilize population growth.

We ask that you shed light on the BLM’s reversal and new decision to push forward with the ovariectomy project – after three failed attempts to undertake the surgical sterilization experiments – as well as the decision to forgo working closely with an academic institution for the purposes of conducting this type of research study. At what stage did the BLM decide that identifying an academic partner that would provide expertise in equine veterinary medicine and welfare was no longer necessary to the project?

It is especially perplexing that in the new 2019 EA, as well as in the 2018 revised EA, the BLM continues to rely on CSU’s Institutional Animal Care and Use Committee (IACUC) approval as a justification for continuing the project, despite CSU’s withdrawal. The IACUC’s approval was premised on CSU’s participation and ability to provide oversight; the proposed experiment fundamentally changed at the point where CSU removed itself (and its team of veterinary and behavioral experts) from the project – most notably, through the absence of the welfare observations, which formed a crux of the proposal published on June 29, 2018, but are no longer a component of the project the BLM is attempting to yet again undertake.

The BLM received thousands of comments in opposition to the experiment. However, the current and previous proposals do not appear to incorporate any substantive revisions based on public input. Again, we would ask that the agency refrain from implementing this controversial mass surgical sterilization project given the agency’s statutory mandate to uphold the welfare of these animals and the serious constitutional concerns that have been raised.

The BLM is charged with protecting wild horses under the landmark 1971 Wild and Free-Roaming Horses and Burros Act.^[3] From a welfare perspective, the “spay” experiment raises serious concerns. Ovariectomy via colpotomy (where a rod and chain is inserted blindly in order to sever the ovaries) carries risks of infection, trauma, hemorrhage, evisceration, and even death. Indeed, part of the stated experimental goal is to quantify morbidity and mortality (the 2018 EA

also considered factors such as the incidence of aborted foals resulting from ovariectomizing pregnant mares). It seems that the agency understands the risky nature of the procedure but is nevertheless aiming to quantify precisely how dangerous it is using federally-protected animals. This is especially disconcerting given the BLM's pronouncement that no post-operative antibiotics will be administered and that no veterinary interventions will be undertaken for any recovering horses returned to the range. The risk of infection or other complications is exacerbated by the fact that, by the agency's own admission, the surgeries will be conducted in an operating space that "may not be entirely sterile".^[4]

At an absolute minimum, independent veterinary and welfare oversight (not unlike what we presume the BLM was hoping to achieve through partnerships with CSU and, before that, OSU) is necessary if a project of this type is to move forward in any respect. From a broader perspective, we would urge the BLM to drop this controversial plan and instead actively pursue humane and scientifically-supported fertility control projects (e.g., the Porcine Zona Pullucida vaccine) that enjoy broad support among key stakeholders and the public at large and that pose fewer harms to the welfare of federally protected wild horses.

Thank you for your consideration.

Sincerely,



Earl Blumenauer
Member of Congress



Ro Khanna
Member of Congress



Andy Levin
Member of Congress



Ann McLane Kuster
Member of Congress

[1] *Ginger Kathrens, et al. v. Ryan Zinke, et al.*, Case No. 18-cv-1691.

[2] National Research Council. 2013. *Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/13511>.

[3] The Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195). See "Section 1333. Powers and duties of the Secretary": "The Secretary is authorized and directed to protect and manage wild free-roaming horses and burros as components of the public lands ..."

[4] DOI-BLM-ORWA-B050-2019-0013-EA, "Spay Feasibility and On-Range Outcomes", Page 30.

Brian K. Fitzpatrick

Brian K. Fitzpatrick
Member of Congress

Lucille Royal Allard

Lucille Roybal-Allard
Member of Congress

Steve Cohen

Steve Cohen
Member of Congress

Nydia M. Velázquez

Nydia Velázquez
Member of Congress

Jan Schakowsky

Jan Schakowsky
Member of Congress

Paul D. Tonko

Paul Tonko
Member of Congress

Vern Buchanan

Vern Buchanan
Member of Congress

Kathleen M. Rice

Kathleen M. Rice
Member of Congress

Bonnie Watson Coleman

Bonnie Watson Coleman
Member of Congress

John Katko

John Katko
Member of Congress

Dina Titus

Dina Titus
Member of Congress

Barbara Lee

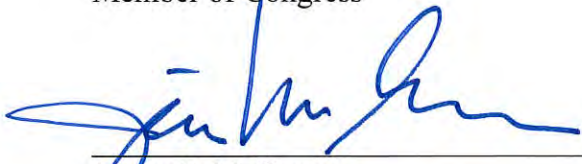
Barbara Lee
Member of Congress



John Yarmuth
Member of Congress



Ted Lieu
Member of Congress



James P. McGovern
Member of Congress



Mark DeSaulnier
Member of Congress



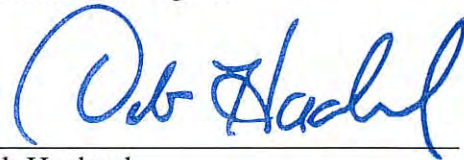
J. Luis Correa
Member of Congress



Katie Porter
Member of Congress



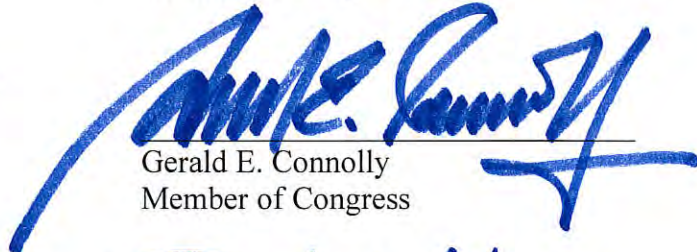
Donald S. Beyer
Member of Congress



Deb Haaland
Member of Congress



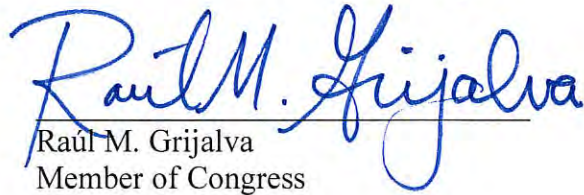
Julia Brownley
Member of Congress



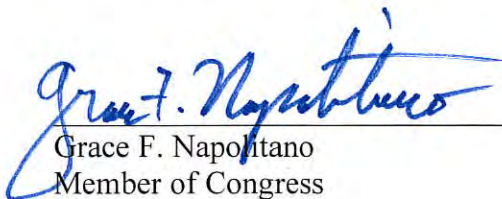
Gerald E. Connolly
Member of Congress



Joe Neguse
Member of Congress



Raúl M. Grijalva
Member of Congress



Grace F. Napolitano
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Matt Gaetz
Member of Congress

United States Senate

WASHINGTON, DC 20510

July 17, 2019

The Honorable David Bernhardt
Secretary, U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Bernhardt:

We are writing to express our concern with the Bureau of Land Management's current proposal to test a controversial surgical sterilization method known as "ovariectomy via colpotomy" on federally protected horses in the Warm Springs Herd Management Area (DOI-BLM-ORWA-B 050-2019-0013-EA).

The proposal, which was released earlier this summer, marks the agency's fourth attempt to proceed with these surgical sterilization experiments, despite two major academic institutions withdrawing their support from previous iterations of the project, significant public opposition to implementing this plan, and a federal court ruling enjoining the BLM from conducting the experiments.¹

The specific surgical procedure in question involves the manual insertion of a metal rod to blindly locate and sever the ovaries of wild mares. The surgeries – with as many as 25 being performed per day – would be performed at a holding facility and corral, which by the BLM's own admission may not provide aseptic operating conditions (thus further exacerbating the potential for complications to arise). Horses would remain conscious during the procedure and would receive minimal post-operative care.

In the National Academy of Sciences' "Using Science to Improve the BLM Wild Horse and Burro Program" – the comprehensive report on management strategies commissioned by the BLM – experts directly advised against employing the "ovariectomy via colpotomy" method. As the NAS noted, "the possibility that ovariectomy may be followed by prolonged bleeding or Peritoneal infection makes it inadvisable for field application." Indeed, numerous equine veterinarians have criticized the procedure given the risks of pain to the horses subjected to these ovariectomies, the need for lengthy and careful post-operative monitoring, the possibility of severing other organs due to the blind nature of the insertion, and the subsequent risks of infection, trauma, or death.

To this last point, the BLM's stated experimental goal is to quantify the rate of mortality and morbidity from conducting these surgeries on wild horses – an apparent recognition of the significant welfare risks to these federally protected animals. The 2018 iteration of the

¹ *Ginger Kathrens, et al. v. Ryan Zinke, et al.*, Case No. 18-cv-1691.

experiments – which a federal court blocked from proceeding – also sought to quantify the incidence of aborted foals after performing ovariectomies on pregnant mares.

From a broader perspective, the rather troubling and usual history of the ovariectomy experiments raises serious questions about the validity and merit of pursuing this project. Both Oregon State University and Colorado State University terminated partnerships with the BLM in helping to conduct and oversee the experiments, thereby removing any outside and independent veterinary oversight. A federal court ruled against the BLM in the 2018 proposal in part because of the lack of meaningful independent observation. Once OSU and CSU dropped out, rather than seek another research institution with experts in equine behavior and veterinary care, the BLM unilaterally decided to proceed alone, essentially asking the public to take the agency's word for it that it would provide an unbiased assessment of the outcome.

The BLM has received thousands of comments opposing the surgical sterilization experiments – many of which have called for the agency to implement fertility control options that enjoy broad support. As recently as February of 2019, the BLM announced that it would implement an immunocontraceptive vaccine program to manage the Warm Springs HMA horses – an encouraging development given the scientific consensus that such vaccines are safe, appropriate, and practical. We would ask the BLM to explain its decision to backtrack on this decision to implement a far more widely supported and humane fertility control strategy.

Wild horses are of course protected under the landmark Wild and Free-Roaming Horses and Burros Act and the BLM must take seriously its charge to protect these icons from “harassment or death.” That the agency would attempt to expend taxpayer dollars pushing through a highly controversial project that could result in injuries and infections to, or even the death of, horses under its authority may ultimately contravene its mandate under the law.

We urge the BLM to drop this controversial plan and instead actively pursue humane and scientifically-supported fertility control projects, such as the Porcine Zona Pellucida vaccine, that enjoy broad support and pose significantly less risk of harm to the welfare of federally protected wild horses. At a minimum, independent veterinary and welfare oversight is necessary if this project is to move forward.

Thank you for your prompt attention to this matter and we look forward to your response.

Sincerely,



Cory A. Booker
United States Senator



Tom Udall
United States Senator

Kamala D. Harris
United States Senator

Edward J. Markey
United States Senator

Richard Blumenthal
United States Senator

Robert Menendez
United States Senator

Christopher A. Coons
United States Senator

Dianne Feinstein
United States Senator

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN WILD HORSE
PRESERVATION CAMPAIGN, *et al.*,

Plaintiffs,

v.

KEN SALAZAR, Secretary of the Department
of the Interior, *et al.*,

Defendants.

Civil Action No. 11-02222 (BAH)
Judge Beryl A. Howell

MEMORANDUM OPINION AND ORDER

This case involves a challenge by nonprofit groups and individual citizens to administrative decisions made by the Interior Department’s Bureau of Land Management (“BLM”) in 2008 and 2011, which, *inter alia*, authorize the rounding up, castrating, and returning of gelded (or castrated) wild horses to public land in Nevada. *See* Complaint (“Compl.”), ECF No. 1, ¶ 1. The Plaintiffs¹ allege that these administrative decisions violate the Wild Free-Roaming Horses and Burros Act (“WHA”), 16 U.S.C. §§ 1331-1340, the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321-4370f, the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 551-706, and BLM’s regulations. Compl. ¶¶ 1-2. On March 16, 2012, the Plaintiffs filed a Motion for Summary Judgment. ECF No. 18. In that Motion, the Plaintiffs relied, *inter alia*, on the declarations of four leading wild horse experts: (1) Dr. Anne

¹ The Plaintiffs in this case are the American Wild Horse Preservation Campaign (“AWHPC”), which is a “broad-based coalition of public interest groups, environmentalists, humane organizations, and historical societies representing over ten million supporters,” Compl. ¶ 4; the Western Watersheds Project (“WWP”), a “nonprofit conservation group . . . that protects and restores western watersheds and wildlife through education, public policy initiatives, and litigation — with a particular focus on public lands management in eight western states including Nevada,” *id.* at 8; the Cloud Foundation, a 501(c)(3) nonprofit organization based in Colorado “dedicated to the preservation of wild horses and burros on public lands in the western United States including in the Pancake Complex,” *id.* at 12; Craig Downer, a “fourth generation Nevadan” who is a “renowned wildlife ecologist,” *id.* at 14; and Arla Ruggles, who is “a photographer with a professional and personal interest in the Pancake Complex wild horse herds, including the Jakes Wash herd.” *Id.* at 16.

Perkins (Ex. A), (2) Dr. Bruce Nock (Ex. B), (3) Dr. Jay Kirkpatrick (Ex. C), and (4) Dr. Allen Rutberg (Ex. D) (collectively, the “Expert Declarations”). *Id.*, Ex. A-D. The Defendants now seek to strike the portions of the Plaintiffs’ Motion for Summary Judgment and supporting memorandum that rely on the Expert Declarations. Pending before the Court is the Defendants’ Expedited Motion to Strike Extra-Record Evidence and Memorandum in Support, ECF No. 19 (“Motion to Strike”), in which the Defendants seek to bar consideration of the Expert Declarations on grounds that (1) these declarations are not part of the Administrative Record (“AR”), and (2) the Plaintiffs erred in not seeking leave of the Court to supplement the AR with the Expert Declarations in accordance with the scheduling order, *see* Minute Order (Dec. 22, 2011) (“The plaintiffs shall file any motion to compel completion or supplementation of the Administrative Records or for review of extra-record documents by February 28, 2012.”). For the reasons explained below, the Court denies the Defendants’ Motion. The Court concludes that the Expert Declarations are part of the AR, so the Court also denies Defendants’ request, *see* Motion to Strike at 2, for “leave to file responsive evidence” and for an adjustment of the summary judgment briefing schedule.

I. BACKGROUND

A. OVERVIEW OF PLAINTIFFS’ CLAIMS

This case arises from a challenge to BLM’s administrative decisions related to the management of wild horse populations on public lands, and particularly BLM’s decision to round up horses, castrate the males, and then return the gelded (or castrated) horses (“geldings”) to public land. Although the Plaintiffs’ claims relate particularly to BLM’s 2008 and 2011 administrative decisions affecting wild horses in an area known as Pancake Complex² located in

² The Pancake Complex is an area of 1,166,099 acres of mostly public lands in central Nevada. Pls.’ Mem. in Supp. of Mot. for Summ. J., ECF No. 18 (“Pls.’ Summ. J. Mem.”), at 8. The Pancake Complex consists of the Pancake

central Nevada, the Plaintiffs argue that BLM's approach in Nevada is a "prototype for BLM wild horse management across the West" Pls.' Mem. in Opp. to Fed. Defs.' Mot. to Strike, ECF No. 22 ("Pls.' Mem."), at 2.

In 2011, two of the Plaintiffs in this case (AWHPC and WWP) were involved in a related lawsuit against BLM, challenging BLM's plans for the management of wild horses in the White Mountain and Little Colorado HMAs in Wyoming. BLM's plans for those two HMAs in Wyoming called for the round-up and removal of female horses and the castration of male horses, which would then be returned to the range. *See Am. Wild Horse Preservation Campaign v. Salazar*, 800 F. Supp. 2d 270, 271 (D.D.C. 2011) (Jackson, J.). The Plaintiffs relied on the same four Expert Declarations that are the subject of the pending Motion. *Id.* at 273 (noting that "all of the Declarations attached to plaintiffs' motion for preliminary injunction addressed the environmental, behavioral, genetic, physiological, aesthetic, social, and/or ecological effects of the particular population management approach embodied in the modified decision: castration."). Before a decision on the merits of Plaintiffs' challenges was released, however, BLM abandoned its rounding up and gelding plan while the lawsuit was pending. Despite the Plaintiffs' requests to proceed with the lawsuit because BLM had other proposed actions pending that included a gelding program, *see id.*, the Plaintiffs' claims were dismissed as moot. *Id.* at 271. Following dismissal of that case, the Plaintiffs claim that BLM has considered using the gelding approach in other areas in both Wyoming and Nevada, including the Tri-State-Calico Complex in Nevada, the Great Divide Basin HMA in Wyoming, and the Red Desert Complex in Wyoming, but in the face of opposition has withdrawn this method in each of these locations. Pls.' Mem. at 5; *see also* Declaration of Suzanne Roy, ECF No. 22, Ex. A (dated Apr. 9, 2012) ("Roy Decl.") ¶ 7.

Herd Management Area ("HMA") (855,000 acres), the Sand Springs West HMA (157,436 acres), and the Jakes Wash HMA (153,663 acres). *Id.*; *see also* BLM Pancake Complex Decision, AR 21-22 (the AR was manually filed with the Court, rather than filed on ECF, due to the large volume of the AR).

Notably, in each of the prior Wyoming and Nevada proceedings in which the gelding approach was considered by BLM, AWHPC submitted statements by the same experts whose declarations are at issue here. Roy Decl. ¶¶ 6-7; Pls.' Mem at 5. As AWHPC points out, "all of these declarations had been submitted to the [BLM] on several occasions long before BLM issued the decision that is challenged in this case, and specifically with reference to the agency's failure to consider the environmental impacts of its proposed strategy of returning gelded male horses to the range." Roy Decl. ¶ 1.

On November 28, 2011, BLM again announced plans to "pilot" a gelding program. BLM's Egan Field Office in Ely, Nevada released the Pancake Complex Final Decision ("Pancake Complex Decision") announcing that the BLM Egan and Tonopah Field Offices in Nevada had determined that there were "excess wild horses . . . present within and outside the boundaries" of the Pancake Complex, and proposing a "pilot" program involving the gelding approach to manage the horse population. *See* Decision Record, AR 11. BLM explained that the proposed action "is a pilot management alternative that calls for a phased-in approach [involving] gradually removing excess animals, implementing fertility control, adjusting sex ratios, and managing a portion of the herd as a non-breeding population of geldings." *Id.*

On December 14, 2011, following BLM's announcement about the Pancake Complex Decision, the Plaintiffs filed a Complaint challenging two decisions of BLM: (1) the 2008 Ely Resource Management Plan ("RMP"), and its accompanying Final Environmental Impact Statement ("FEIS"), in which the Plaintiffs claim that BLM authorized the removal of all wild horses in the "Jakes Wash" area of Nevada and a substantial reduction in the wild horse population in the Pancake Complex, and (2) BLM's November 28, 2011 Pancake Complex Decision, in which BLM sought to implement the Ely RMP with, *inter alia*, a "pilot"

management program of castrating wild horses and returning these “geldings” to the range, without considering the various environmental impacts of this approach, and without preparing an Environmental Impact Statement (“EIS”). *See* Compl.; Pls.’ Summ. J. Mem. at 1.

In their Complaint, Plaintiffs allege that BLM has (1) “violated its obligations under the WHA to ‘protect and manage’ these ‘wild and free-roaming’ horses as ‘living symbols of the historic and pioneer spirit of the West’ and to ensure that ‘all management activities shall be at the minimal feasible level,’” Compl. ¶ 1 (quoting 16 U.S.C. §§ 1331, 1333(a)); (2) “violated its obligations under the [NEPA] by failing to adequately analyze the environmental consequences of its decision on the individual wild horses or the herds as a whole; failing to consider reasonable alternatives such as reducing the amount of livestock permitted on these lands; and failing to prepare an [EIS],” *id.* ¶ 1; (3) “violat[e] its own resource management plan for this area of public lands which requires it to ‘protect’ and ‘maintain’ viable, ‘self-sustaining’ herds of ‘wild’ horses while retaining their ‘free-roaming’ nature . . . ,” *id.* ¶ 2, and (4) “violated its obligations under the [APA] by failing to consider the impacts of its actions on both the individual horses and wild populations as a whole; failing to explain the basis for its management choices; and failing to respond to significant comments in opposition to these management actions, including sworn declarations from biologists and others concerning the significant adverse [e]ffects such actions will have on these wild horses,” *id.* The Plaintiffs ask that the Court enjoin the Defendants “from taking any further actions to roundup and remove any wild horses from the Pancake Complex, including Jakes Wash, until they have fully complied with the provisions of [the WHA, NEPA, and the APA].” *Id.* at 34.

The Plaintiffs have moved for Summary Judgment on their claims, relying in part on the Expert Declarations, which raise concerns about the management of wild horse populations

using the method of gelding male horses. *See* ECF No. 18, Exs. A-D.

B. MOTION TO STRIKE

Before responding to the Plaintiffs' Motion for Summary Judgment, the Defendants moved to strike the Expert Declarations and any reference to them in the Plaintiffs' Motion for Summary Judgment. ECF No. 19. The Defendants claim that these Expert Declarations are not part of the AR because the comments submitted by the Plaintiffs in 2011 during the 30-day public comment period on the Preliminary Environmental Assessment ("PEA") for the Pancake Complex Decision did not include the four Expert Declarations. A brief overview of the circumstances surrounding this comment period, and leading up to the Plaintiffs' filing of their Motion for Summary Judgment, is helpful to understanding the Defendants' pending Motion, and why this Court must deny the Motion.

On September 28, 2011, less than one month after the August 8, 2011 dismissal of the lawsuit against BLM over its proposed gelding plan for two HMAs in Wyoming, BLM through its Egan Field Office announced its plans to include a gelding component in a horse roundup in the Pancake Complex. *See* AR 151. The Pancake Complex proposal called for the gathering of approximately 65 to 70% of the wild horses every two to three years with the goal of removing approximately 800 to 1,000 excess horses per gather for a period of six to ten years. *See* AR 162. The proposal said that "[a]pproximately 200 stallions would be gelded (castrated) and released back into the HMA's representing a non-reproductive component in the HMA." *Id.* at 163. According to BLM's proposal, the "targeted number of geldings would also be phased-in over two to three gather cycles in order to observe how the geldings are transitioning into the overall population as well as utilizing their habitat." *Id.* BLM's Egan Field Office announced a 30-day comment period for the PEA for the Pancake Complex Decision, with all public

comments to be received no later than October 28, 2011. *See* Motion to Strike at 2; AR 151.

AWHPC responded to the proposal on October 28, 2011 by submitting via facsimile transmission to the Egan Field Office detailed comments opposing the proposed decision. AR 646-64. The comments emphasized that BLM included in its proposal only “anecdotal” information about the expected impact of gelding on stallions, and referenced no scientific studies or data. *Id.* at 652. The comments also noted that the PEA “fails entirely to consider the impacts of sterilization on stallions . . . as well as their behavior and therefore impact on the herd.” *Id.*

Of most relevance to the instant Motion, AWHPC’s comments relied heavily on the Expert Declarations. The comments stated that “the impacts of sterilization on wild horses can be severe, affecting both their physiology and ability to survive, as well as their behavior and therefore impact on the herd” and requested that BLM “[p]lease see expert declarations from Drs. Allen Rutberg, Dr. Anne Perkins, Dr. Jay Kirkpatrick and Dr. Bruce Nock for details (Attachments 3-6).” *Id.* The comments also provided lengthy excerpts of the Expert Declarations. *See id.* at 652-53. The comments, for example, quoted Dr. Kirkpatrick, the Director of Science and Conservation Biology at Zoo Montana and a “foremost authority on wildlife reproductive biology” as stating that “[c]astrating horses will effectively remove the biological and physiological controls that prompt these stallions to behave like wild horses. This will negatively impact the place of the horse in the social order of the band and the herd.” *Id.* The comments also quote Dr. Nock, a faculty member at Washington University School of Medicine, as stating, *inter alia*, that “[g]elding (removing a horse’s testes) will have irreversible effects on both the individual horse and the herd . . . In my professional opinion, releasing a castrated horse into a wild herd is an inhumane management approach that certainly does not

‘protect’ or ‘help preserve’ wild horses in any sense of the word.” *Id.* at 653. AWHPC’s comments, relying on the Expert Declarations, are indisputably part of the AR. *See* AR 646-64.

The parties dispute, however, whether the Expert Declarations relied on in AWHPC’s comments are part of the AR because they were not received before the end of the comment period. Although the comments included a list of “Attachments” that referenced the four Expert Declarations, *see* AR 664, AWHPC concedes that the Expert Declarations were not attached to the comments faxed to BLM before the comment period deadline. These declarations were only referenced and quoted in the text of the comments as well as cited in the list of references at the end of the comments. *See* Declaration of Deniz Bolbol, ECF No. 22, Ex. D (dated Apr. 6, 2012) (“Bolbol Decl.”) ¶ 7. AWHPC points out that the Expert Declarations were, instead, sent in an email within two hours after the deadline for the comments period. The comments in the AR suggest that the attachments would be emailed separately; at the top of the comments, it is noted “Via Email (with attachments): PancakeComplex@blm.gov” and “Via Fax (without attachments): 775-289-1910.” AR 646. It is unclear from the record, however, whether BLM ever received the Expert Declarations by email. While AWHPC assumed that the Expert Declarations had been received and would be considered in the agency’s decision-making process, *see* Bolbol Decl. ¶ 14, BLM argues that it never received the Expert Declarations by email and the Expert Declarations were not considered. Fed. Defs.’ Reply in Supp. of Defs.’ Mot. to Strike, ECF No. 23 (“Def’s.’ Reply”), at 3 n.1 (citing Declaration of Ruth A. Thompson, ECF No. 19, Ex. C (dated Mar. 30, 2012) (“Thompson Decl.”) ¶ 15).

The Communications Director for AWHPC, Deniz Bolbol, states that, after the comments were submitted by facsimile to BLM, she sent three emails to BLM between 1:49 A.M. and 1:57 A.M. on October 29, 2011. Bolbol Decl. ¶ 7. The first email was a “courtesy copy” of the

comments that were earlier faxed to BLM on October 28, 2011. The second email contained six of the twelve attachments referenced in AWHPC's comments (including all four of the Expert Declarations), and the third email contained the remaining six attachments. *Id.* On Sunday, October 30, 2011, Bolbol received an "error message" from her email provider "indicating that BLM's email server did not accept" one of the three email messages, namely the second email message containing the four Expert Declarations. *Id.* at ¶ 9. On October 31, 2011, the first business day following the end of the comment period, Bolbol called and left a voicemail message for a BLM Ely Field Office employee (Ruth Thompson) explaining the situation and requesting a call back. *Id.* Bolbol then emailed two employees of BLM's Ely Field Office (Ruth Thompson and Rosemary Thomas) explaining the email error message and requesting confirmation that the email attachments had been received. *Id.* On Tuesday, November 1, 2011, Bolbol again emailed the same two employees of BLM's Ely Field Office and informed them that, since she had not yet heard back from them, she would re-send the emails to ensure that BLM had them. *Id.* at ¶ 10. Bolbol then resent the emails, along with all of the attachments. This time she sent the emails with fewer attachments, and did not receive any error messages, "leading [her] to believe that the messages had been properly received by BLM." *Id.*³

On November 3, 2011, Bolbol received an email from Ruth Thompson, replying to Bolbol's email of October 31, 2011, noting that the Ely District BLM received two emails from Bolbol. Email from Ruth Thompson to Deniz Bolbol, ECF No. 19, Ex. A (dated Nov. 3, 2011, 10:11 A.M.). Thompson noted that the second email "was not received possibly due to the attachments being too large. The total message size including attachments must not exceed 4 megabytes. If there were any attachments please send fewer attachments per message or use a

³ Apparently, BLM contends that it did not receive the Expert Declarations as email attachments with the November 1, 2011 emails. Thompson Decl. ¶¶ 11, 15.

compression utility to reduce the attachment size.” *Id.* Thompson emphasized, however, that “[r]egardless of whether or not BLM received all of these messages, the fact is these messages were sent after the comment period closed. Therefore we are unable to include these comments into the EA.” *Id.* Bolbol replied arguing that “[t]he attachments are supportive of the letter itself and it [is] unreasonable that the BLM is not willing to accept attachments to public comments sent within the public comment period.” Email from Deniz Bolbol to Ruth Thompson, ECF No. 19, Ex. A (dated Nov. 3, 2011, 11:08 A.M.). Thompson replied by email again, noting that the Ely District BLM did receive the comments by fax on October 28, 2011 but noting that no “documentation” was received until after the public comment period had closed. Email from Ruth Thompson to Deniz Bolbol, ECF No. 19, Ex. A (dated Nov. 3, 2011, 1:36 P.M.)

On November 4, 2011, Bolbol emailed Thompson, stating that “we wanted to make sure that the documents referenced in our comments are properly considered as part of the administrative record for the PEA.” Email from Deniz Bolbol to Ruth Thompson, ECF No. 19, Ex. A (dated Nov. 4, 2011, 11:14 A.M.). The email listed the 12 attachments that were referenced in AWHPC’s comments, including the Expert Declarations:

3. Declaration of Dr. Anne Perkins – In the possession of the BLM pursuant to Civil Action No. 11-1352 (ABJ), American Wild Horse Preservation Campaign, et al. v. Ken Salazar, Secretary, Department of Interior, et. al.
4. Declaration of Dr. Allen Rutberg – In the possession of the BLM pursuant to Civil Action No. 11-1352 (ABJ).
5. Declaration of Dr. Jay Kirkpatrick – In the possession of the BLM pursuant to Civil Action No. 11-1352 (ABJ).
6. Declaration of Dr. Bruce Nock – In the possession of the BLM pursuant to Civil Action No. 11-1352 (ABJ).

Email from Deniz Bolbol to Ruth Thompson, ECF No. 19, Ex. A (dated Nov. 4, 2011, 11:14 A.M.). The email further stated that “[a]lthough [the BLM] is already in possession of 11 out of 12 of the referenced documents, we wanted to provide you with another copy of these records

via email. Similarly, as a courtesy, we emailed the BLM an electronic copy of the comments, which you acknowledge receiving on October 28, 2011. The emailed version of the faxed comments was received by your office one hour and 47 minutes after the comment deadline (i.e. at 1:47 a.m. on Saturday, October 29, 2011). Again, since the referenced attachments in AWHPC's comments on the Pancake Complex PEA are already in the possession of the BLM, we fully expect that these records will be considered as part of the administrative record for this EA." *Id.*

On February 14, 2012, BLM lodged a 10,972-page administrative record, which it provided to Plaintiffs' counsel the next day. Pls.' Mem. at 10 (citing Declaration of William S. Eubanks II, ECF No. 22, Ex. E (dated Apr. 9, 2012) ("Eubanks Decl.") ¶ 2). The Plaintiffs state that Plaintiffs' counsel confirmed that AWHPC's comments were in the AR and then, "assuming that such comments necessarily included the supporting attachments, . . . devoted his scant remaining time to sifting through the balance of the record . . ." Pls.' Mem. at 10. The Plaintiffs explain that it only came to the attention of Plaintiffs' counsel on February 29, 2012, the day after motions for supplementation of the administrative record were due pursuant to this Court's scheduling order, that the attachments to AWHPC's comments (including the Expert Declarations), were not included in the AR. *Id.* (citing Eubanks Decl. ¶ 4).

After realizing that the attachments were not included in the AR, Plaintiffs' counsel "immediately contacted BLM's counsel . . . request[ing] that the attachments be included with the supplemental Administrative Record filing that BLM had already agreed to file." Pls.' Mem. at 10. According to the Plaintiffs, BLM's counsel responded, however, that "[b]ecause the additional documents were submitted after the comment period had closed, BLM did not consider the documents in making the decisions challenged in this litigation, and therefore they

are not part of the administrative record.” *Id.* at 10-11 (citation omitted).⁴ Plaintiffs’ counsel informed Defendants’ counsel that the Plaintiffs still planned to rely on the Expert Declarations in their Motion for Summary Judgment “because of Plaintiffs’ view that these attachments should have been part of the record because they were in BLM’s possession at the time it made its decision, and that, in any case, under D.C. Circuit case law . . . , the Court can consider the documents because they are extra-record evidence of BLM’s failure to consider relevant factors required by NEPA and the APA.” *Id.* at 11. According to the Plaintiffs, Defendants’ counsel responded, “I understand your position and that you need to do what you feel you must do.” *Id.* (quoting Eubanks Decl. ¶ 6).

Without seeking leave of the Court to supplement the AR with the Expert Declarations, on March 16, 2012, the Plaintiffs filed their Motion for Summary Judgment, relying on the Expert Declarations. ECF No. 18. In support of their Motion, Plaintiffs stated that “[a]lthough BLM takes the position that these expert declarations should not be considered by the Court in this case, BLM clearly had all of these declarations in its possession when it decided to use gelding in the Pancake Complex on November 28, 2011, and hence these materials were clearly before the agency when it made this decision, and therefore must be considered part of the Administrative Record.” *Id.* at 15-16 n.6. The Plaintiffs note that “if necessary, Plaintiffs can formally move the Court to require BLM to include them in the record.” *Id.*

II. STANDARD OF REVIEW

Under the APA, “the focal point for judicial review should be the administrative record already in existence, not some new record made initially in the reviewing court.” *Camp v. Pitts*,

⁴ The Defendants clarify that while Defendants’ counsel initially told the Plaintiffs that the Expert Declarations were not included in the administrative record because they were received after the comment period, the Expert Declarations that the Plaintiffs intended to attach to their comments were actually never received by BLM. *See* Defs.’ Reply at 3 n.1 (citing Thompson Decl. at ¶ 15).

411 U.S. 138, 142 (1973). An agency's designation of the record "is entitled to a strong presumption of regularity." *Pac. Shores Subdiv. v. U.S. Army Corps of Eng'rs*, 448 F. Supp. 2d 1, 6 (D.D.C. 2006) (citation omitted). At the same time, "[i]f a court is to review an agency's action fairly, it should have before it neither more nor less information than did the agency when it made its decision" because "[t]o review less than the full administrative record might allow a party to withhold evidence unfavorable to its case" *Walter O. Boswell Memorial Hospital v. Heckler*, 749 F.2d 788, 792 (D.C. Cir. 1984). An agency "may not skew the record in its favor by excluding pertinent but unfavorable information, [n]or may the agency exclude information on the grounds that it did not 'rely' on the excluded information in its final decision." *Fund for Animals v. Williams*, 391 F. Supp. 2d 191, 197 (D.D.C. 2005) (citations omitted). Instead, the "record must include all documents that the agency directly or indirectly considered." *Id.* at 196 (citations and quotation marks omitted). The "whole record include[s] all materials that might have influenced the agency's decision, and not merely those on which the agency relied in its final decision." *County of San Miguel v. Kempthorne*, 587 F. Supp. 2d 64, 71 (D.D.C. 2008) (citation and quotation marks omitted).

"To overcome the strong presumption of regularity to which an agency is entitled, a plaintiff must put forth concrete evidence that the documents it seeks to 'add' to the record were actually before the decisionmakers." *Franks v. Salazar*, 751 F. Supp. 2d 62, 67 (D.D.C. 2010) (citation omitted). "A plaintiff cannot merely assert, however, that materials were relevant or were before an agency when it made its decision . . . Instead, the plaintiff must identify reasonable, non-speculative grounds for its belief that the documents were considered by the agency and not included in the record." *Id.* (citations, quotation marks, and emphasis omitted).

The D.C. Circuit has explained that courts "do not allow parties to supplement the record

unless they can demonstrate unusual circumstances justifying a departure from this general rule.” *City of Dania Beach v. FAA*, 628 F.3d 581, 590 (D.C. Cir. 2010). The record may be supplemented in three circumstances: “(1) if the agency deliberately or negligently excluded documents that may have been adverse to its decision, (2) if background information was needed to determine whether the agency considered all the relevant factors, or (3) if the agency failed to explain administrative action so as to frustrate judicial review” *Id.* (citation and quotation marks omitted); *see also County of San Miguel*, 587 F. Supp. 2d at 72 (explaining that “a party seeking to supplement the record must establish that the additional information was known to the agency when it made its decision, the information directly relates to the decision, and it contains information adverse to the agency’s decision”).

III. DISCUSSION

On March 30, 2012, the Defendants filed the instant Motion, moving to strike the Expert Declarations appended as exhibits to the Plaintiffs’ Motion for Summary Judgment and the parts of Plaintiffs’ memorandum in support of their Motion for Summary Judgment that rely on these declarations.⁵ The Defendants posit three grounds for exclusion of the Expert Declarations, arguing that (1) the Declarations are not part of the certified AR because BLM did not receive or consider them in its decision process and the contents of the AR are “entitled to a strong presumption of regularity,” Motion to Strike at 4 (quoting *Pac. Shores Subdiv.*, 448 F. Supp. 2d at 6 (citation omitted)); (2) the Plaintiffs’ citation to the Expert Declarations in their comments does not mean that the Declarations themselves are part of the AR; and (3) supplementation of the AR is inappropriate because the Plaintiffs never moved the Court, in accordance with the scheduling order, to supplement the AR. These arguments are not persuasive.

⁵ At the request of the Defendants, with the consent of the Plaintiffs, the Court stayed summary judgment briefing deadlines pending a decision on this Motion. *See* Minute Order (Apr. 3, 2012).

The Court will deny the Motion to Strike because the Plaintiffs have shown that AWHPC's timely-filed comments opposing the Pancake Complex Decision clearly cite, and rely extensively on, the Expert Declarations that were already known to BLM, were directly related to and adverse to the agency's decision, and should have been considered part of the AR. *See County of San Miguel*, 587 F. Supp. 2d at 72 (explaining that "a party seeking to supplement the record must establish that the additional information was known to the agency when it made its decision, the information directly relates to the decision, and it contains information adverse to the agency's decision"). First, BLM was in possession of the Expert Declarations when it made the Pancake Complex Decision shortly after the dismissal as moot of related litigation, in which the Expert Declarations were filed, in the District Court of the District of Columbia. *See Am. Wild Horse Preservation Campaign v. Salazar*, 800 F. Supp. 2d 270, 273 (D.D.C. 2011) (Jackson, J.). Not only was BLM in possession of the Expert Declarations from the dismissed lawsuit relating to an HMA in Wyoming, but BLM also possessed the scientific evidence regarding BLM's gelding approach to wild horse management presented by these same Declarants in connection with BLM's proposed administrative actions in three other HMAs in both Wyoming and Nevada. Roy Decl. ¶¶ 1, 6-7. One part of an agency – here, the Egan Field Office – may not simply remain studiously ignorant of material scientific evidence well known to the agency and brought directly to its attention in timely-filed comments. Second, AWHPC's timely-filed comments opposing the Pancake Complex Decision cite to, quote from, and rely extensively on the Expert Declarations of which BLM was already aware. *See* AR 652 ("Please see expert declarations from Drs. Allen Rutberg, Dr. Anne Perkins, Dr. Jay Kirkpatrick and Dr. Bruce Nock for details (Attachments 3-6)"). Thus, the scientific evidence contained in these Expert Declarations should have been considered by BLM and supplementation of the AR with

these Expert Declarations should not, therefore, impose any burden on the agency. The Court is persuaded that this is an exceptional circumstance where supplementation of the Administrative Record is appropriate.⁶

First, the Defendants' argument that the Expert Declarations are not part of the certified AR because BLM did not receive or consider them in its decision process is unavailing. While the contents of the AR are indeed "entitled to a strong presumption of regularity," *Pac. Shores Subdiv.*, 448 F. Supp. 2d at 6, the Plaintiffs in this case have rebutted the presumption of record regularity where it is evident that the agency was aware of and in possession of the four specific Expert Declarations on which the Plaintiffs relied extensively in their comments. *See County of San Miguel*, 587 F. Supp. 2d at 71 (explaining that the "whole record include[s] all materials that

⁶ Even if these Expert Declarations were not part of the AR, the Court would likely consider them as extra-record evidence. Extra-record evidence "consists of evidence outside of or in addition to the administrative record that was not necessarily considered by the agency." *Nat'l Mining Ass'n v. Jackson*, Nos. 10-1220, 11-295, 11-0446, 11-0447, 2012 U.S. Dist. LEXIS 56595, *16 (D.D.C. Apr. 20, 2012) (citation omitted). In *Esch v. Yeutter*, the D.C. Circuit stated that extra-record evidence could be considered in the following eight circumstances: "(1) when agency action is not adequately explained in the record before the court; (2) when the agency failed to consider factors which are relevant to its final decision; (3) when an agency considered evidence which it failed to include in the record; (4) when a case is so complex that a court needs more evidence to enable it to understand the issues clearly; (5) in cases where evidence arising after the agency action shows whether the decision was correct or not; (6) in cases where agencies are sued for failure to take action; (7) in cases arising under the National Environmental Policy Act; and (8) in cases where relief is at issue, especially at the preliminary injunction stage." *Esch v. Yeutter*, 876 F. 2d 976, 991 (D.C. Cir. 1989). Following *Esch*, the D.C. Circuit "appears to have narrowed these exceptions to four: (1) when the agency failed to examine all relevant factors; (2) when the agency failed to explain adequately its grounds for its decision; (3) when the agency acted in bad faith; or (4) when the agency engaged in improper behavior." *Nat'l Mining Ass'n*, 2012 U.S. Dist. LEXIS 56595, at *17; *see also Cape Hatteras Access Pres. Alliance v. United States DOI*, 667 F. Supp. 2d 111, 115 (D.D.C. 2009) (noting that the *Esch* exceptions are narrower than some courts have found). Here, under the exceptional circumstances of this case where BLM had before it Expert Declarations raising specific scientific concerns about the gelding approach and the Defendants state that they made a final decision without considering the Expert Declarations, the Court would consider the Expert Declarations as extra-record evidence in determining whether the agency examined all relevant factors. *See Nat'l Mining Ass'n*, 2012 U.S. Dist. LEXIS 56595, at *19 (noting that "extra-record evidence will only be considered if it is needed to assist a court's review"); *Cape Hatteras Access Pres. Alliance*, 667 F. Supp. 2d at 115 (explaining that the *Esch* exceptions "are generally more appropriately applied in actions contesting the procedural validity of agency decisions, but even if they are not so limited, it is clear that they were to be sparingly applied to only those cases where extra-record evidence was necessary to make judicial review effective"); *Pac. Shores Subdiv.*, 448 F. Supp. 2d at 6 ("Consideration of extra-record information is appropriate when simply reviewing the administrative record is not enough to resolve the case.").

might have influenced the agency's decision, and not merely those on which the agency relied in its final decision") (citation and quotation marks omitted). Even if the "pilot" approach in Nevada was a site-specific decision by the Egan and Tonopah Field Offices, in consultation with the Nevada State Director of BLM, *see* Declaration of Alan Shepherd, ECF No. 23, Ex. A (dated Apr. 16, 2012) ("Shepherd Decl.") ¶¶ 11-12, these offices must have been aware of the very recent litigation in federal court related to BLM's gelding approach. Furthermore, as the Plaintiffs point out, AWHPC had earlier submitted comments on July 18, 2011 and reports by the same experts in opposing efforts by another Nevada Field Office to include a gelding component at the Tri-State Calico Complex in Nevada. *See* Pls.' Surreply in Opp. to Fed. Defs.' Motion to Strike ("Pls.' Surreply") at 5. It thus seems highly unlikely that the Nevada State Director of BLM, who requested that gelding be included in gather plans in Nevada, was not aware of the Expert Declarations that offered a strong critique of the practice of gelding.⁷ *See* Shepherd Decl. ¶ 11. Even if the Nevada decision-makers were not aware of the Expert Declarations before the lapse of the comment period on the Pancake Complex Decision, however, the Plaintiffs specifically brought the Expert Declarations to their attention and asked the agency to consider them in their timely-filed comments. While an agency decisionmaker "is not obligated to include every potentially relevant document existing within its agency," in an AR, *Pac. Shores Subdiv.*, 448 F. Supp. 2d at 6, "those documents that were directly or indirectly considered by the [agency's] decisionmaker(s) should be included in the administrative record." *Id*; *see also* *Ctr. for Biological Diversity v. United States BLM*, No. C-06-4884-SI, 2007 U.S. Dist. LEXIS 81114, at *12 (N.D. Cal. Oct. 18, 2007) (allowing supplementation of the

⁷ This Court does not hold that every field office of BLM is responsible for being cognizant of federal litigation involving subject areas under their supervision, but where declarations are pointed out to a field office by a party in their timely-filed comments about a proposed program, and are directly related to the specific program under consideration (in this case, gelding), it would seem irresponsible for the field office not to take note of earlier highly relevant federal litigation.

administrative record with evidence that was before the agency and considered directly or indirectly). Where the Defendants admit that the parts of the Expert Declarations relied on by the Plaintiffs in their comment letter are part of the AR, *see* Defs.’ Reply at 7 n.2, where the Plaintiffs referred BLM to the Expert Declarations in their timely-filed comments, where the Expert Declarations as a whole were before BLM in very recent prior litigation, and where the Expert Declarations were related and adverse to the Pancake Complex Decision, the Court concludes that the Expert Declarations should be included in the administrative record. *See, e.g., Ad Hoc Metals Coalition v. Whitman*, 227 F. Supp. 2d 134, 139 (D.D.C. 2002) (allowing supplementation of the administrative record with transcript from proceedings held after the end of the comment period where the transcript was “directly related to the issue decided in the final rule,” and “was adverse to the agency’s position,” and where the agency cosponsored the proceedings).

Second, the Defendants’ argument that the Plaintiffs’ citation to the Expert Declarations in their comments does not make them part of the AR is, in this case, unavailing. The Defendants cite to *In re Delta Smelt Consol. Cases*, No. 09-cv-1053, 2010 WL 2520946, at *3-4 (E.D. Cal. June 21, 2010), for the proposition that mandating agencies to “track down documents referenced in, but not attached to, a comment letter” would be an “unworkable rule.” Defs.’ Reply at 6-7. The Court agrees with the Defendants and the *In re Delta* court that a general rule that “would permit a party to force into the record any number of references, regardless of relevance, simply by attaching to a comment letter a list of references on a particular subject” would indeed be an “unworkable rule.” 2010 WL 2520946 at *4. The Plaintiffs here seek no such rule, however; instead, the Plaintiffs argue that the specific Expert Declarations on which they relied extensively in their timely-submitted comments, and which they requested that BLM

examine, and which were already before BLM in related litigation, and the substance of which was before BLM in other administrative proceedings, are properly part of the AR. The Court agrees. This case is distinguishable from *Marcum v. Salazar*, 751 F. Supp. 2d 74, 80 (D.D.C. 2010), where the Court denied plaintiffs' Motion to supplement the record with court filings and materials related to an earlier case before the same court. In *Marcum*, the Court found that "neither the materials' purported relevance nor plaintiffs' references to [the earlier litigation] during the permitting process constitute concrete evidence that the [agency] considered the materials, either directly or indirectly." *Id.* To the contrary, in this case, the Plaintiffs have shown that they specifically directed the agency to the Expert Declarations in their timely-filed comments and later, less than two hours after the comment period ended, attempted to submit the Expert Declarations to the agency. These efforts, and AWHPC's persistent attempts to ensure that the Expert Declarations were part of the AR, as described *supra* 8-11, constitute evidence that BLM considered the materials at least indirectly.

This case is more analogous to *Styrene Info. & Research Ctr., Inc. v. Sebelius*, No. 11-1079, 2012 U.S. Dist. LEXIS 44214 (D.D.C. Mar. 30, 2012) (Walton, J.), where the plaintiffs sought to supplement the administrative record with reports that were prepared by subgroups of an Expert Panel. While the defendants there argued that the Department of Health and Human Services' National Toxicology Program never considered the subgroup reports, because they were not included in the Expert Panel's final report, the Court disagreed, finding that the subgroup reports were "an integral part of the Expert Panel's peer review process and influenced the Expert Panel's recommendation," even though they were not "ultimately passed on to the final decisionmaker." *Id.* at *14-15. The Court found that the plaintiffs rebutted the "presumption of regularity" of the AR because, *inter alia*, the administrative record included

several references to the subgroup reports. “These references,” the Court noted, “suggest that the Expert Panel substantively considered scientific information and advice contained in the subgroup reports, and was aware of the Expert Panel’s reliance on this information and advice.” *Id.* at *16. The Court concluded that the AR should be supplemented “with the missing subgroup reports” based upon the agency’s consideration of the subgroup reports “at least indirectly;” the “pertinent scientific information” in the reports, which would “assist the Court in conducting its arbitrary and capricious review under the APA;” and the fact that supplementing the AR would not “be overly burdensome for the agency, as it already possesses the reports.” *Id.* at *17. Here, too, the extensive reliance on the Expert Declarations in the Plaintiffs’ comments, which are part of the AR, suggest that the scientific information included in the Expert Declarations was before the decision-makers and considered. The Court finds no reason to exclude the complete Expert Declarations from the AR merely because of a technical problem in forwarding copies of the Expert Declarations to the Defendants in a timely manner.

Indeed, to the extent that BLM argues that it was incumbent on the Plaintiffs to provide copies of the Expert Declarations on which the Plaintiffs relied heavily in their comments, the Court disagrees. BLM was on notice, and in possession, of the Expert Declarations.⁸ While it would have been a courtesy for the Plaintiffs to include a copy of the Expert Declarations already possessed by BLM along with their comments relying on these Expert Declarations, they were not required to do so. Had the Plaintiffs’ comments opposing the Pancake Complex Decision been untimely, then BLM would have been justified in refusing to consider the comments and the Expert Declarations on which they relied. *See, e.g., Appalachian Power Co. v. EPA*, 249

⁸ Even if the Defendants were unaware of where they could retrieve these Expert Declarations when they were cited in AWHPC’s timely-filed comments, AWHPC provided the Defendants the docket number for the case in which these Declarations were filed on November 4, 2011, so the docket citations were available three weeks before the Defendants released their final Pancake Complex Decision on November 28, 2011.

F.3d 1032, 1059 (D.C. Cir. 2001) (“An agency is not required to consider issues and evidence in comments that are not timely filed.”) (citing *Personal Watercraft Indus. Ass’n v. Dep’t of Commerce*, 48 F.3d 540, 543 (D.C. Cir. 1995) (“Agencies are free to ignore such late filings”)). The comments and the “issues and evidence in [the] comments” were, however, timely filed. As such, they should have been considered as part of the AR. *See, e.g., Env’t Council of Sacramento v. Slater*, 184 F. Supp. 2d 1016, 1029 (E.D. Cal. 2000) (supplementing an administrative record with attachments to a comment letter where “plaintiffs provided defendants during the public comment period . . . several letters which laid out the specifics of their contention” and the “attachments [that were never received by the federal defendants because of a mistake of the non-federal defendant] supplemented their efforts by offering full, but not new, evidence of the [programs’] shortcomings”); *see also Ad Hoc Metals Coalition*, 227 F. Supp. 2d at 140 (rejecting argument that “late-filed comments always can be ignored for purposes of the administrative record” and noting that “[w]hile the comment period must end at some point, where highly relevant information comes to light one month later because of an agency’s own initiative, prior to promulgation of a final rule and with a sufficient amount of time remaining that the ultimate decision can be influenced . . . such information should be included in the record.”).

Third, the Defendants’ argument that supplementation of the AR is inappropriate because the Plaintiffs never moved the Court, in accordance with the scheduling order, to supplement the AR is also unavailing. The Defendants argue that “Plaintiffs had ample notice of BLM’s position that the attachments were not in the AR and an opportunity to move to compel record supplementation within the Court’s schedule” but the Plaintiffs did not move for record supplementation. Motion to Strike at 9. “Plaintiffs’ disregard for both the schedule and proper

procedures for supplementing an AR,” the Defendants argue, “should not be rewarded.” *Id.* While the Court takes seriously its scheduling order, given the volume of the AR, and Plaintiffs’ assumption that the Expert Declarations were incorporated in the AR, the Court will excuse the Plaintiffs from not earlier seeking leave to supplement the AR. Accordingly, the Court finds that the Expert Declarations are part of the AR and will consider them in its decision on the Plaintiffs’ Motion for Summary Judgment.

Finally, the Court turns to the Defendants’ request for “leave to file responsive evidence in support of their cross-motion for summary judgment as well as an appropriate adjustment of the summary judgment briefing schedule” should the Court allow consideration of the Expert Declarations. Motion to Strike at 2. Specifically, the Defendants seek to “explain why the [Expert Declarations] (i) address the particularities of the gather plan in Wyoming rather than the Pancake Complex and therefore are inapposite, and (ii) present views considered by the BLM decisionmakers who chose, based on the evidence available at the time, to take a course different than Plaintiffs’ preferred alternative.” Defs.’ Reply at 2. Plaintiffs have noted that they “vigorously oppose this request.” Pls.’ Mem. at 21. The Court denies the request. If the Defendants would like to consider and respond to the Expert Declarations as part of the AR, BLM should seek a remand of its Pancake Complex Decision for reconsideration in light of the Expert Declarations. *See Fla. Power & Light Co. v. Lorion*, 470 U.S. 729, 744 (1985) (“If the record before the agency does not support the agency action, if the agency has not considered all relevant factors, or if the reviewing court simply cannot evaluate the challenged agency action on the basis of the record before it, the proper course, except in rare circumstances, is to remand to the agency for additional investigation or explanation”). The Defendants have provided no compelling reason for the Court to allow them additional time to supplement the evidence in

light of the Expert Declarations that were part of the AR at the time the Pancake Complex Decision was made.

Accordingly, it is hereby

ORDERED that the Defendants' Expedited Motion to Strike Extra-Record Evidence, ECF No. 19, is DENIED; it is further

ORDERED that the Defendants' request to file evidence responsive to the Expert Declarations in support of their cross-motion for summary judgment and for an adjustment in the briefing schedule is DENIED; it is further

ORDERED that the Defendants shall file their cross-motion for summary judgment on or before May 28, 2012. Plaintiffs' Opposition/Reply shall be filed on or before June 14, 2012. Defendants' Reply shall be filed on or before June 28, 2012. Plaintiffs shall file the Joint Appendix, pursuant to Local Civil Rule 7(n), by July 5, 2012. The Court will schedule oral argument on the motions if need be, pursuant to the parties' request, *see* Joint Stipulation, ECF No. 10, at 4.

SO ORDERED.

Date: May 9, 2012

/s/ Beryl A. Howell

BERYL A. HOWELL
United States District Judge

APPENDIX B
NRC REVIEW OF OREGON PROPOSALS 2015



United States Department of the Interior
Bureau of Land Management
National Wild Horse and Burro Program
1340 Financial Boulevard
Reno, Nevada 89502-7147



In Reply Refer To:
4700 (WO261)

Memorandum

To: District Manager, Burns District Bureau of Land Management
From: Paul Griffin, Ph.D.
Wild Horse and Burro Program, Research Coordinator, Bureau of Land Management, 2150 Center Ave., Building C, Fort Collins, Colorado, 80526
Subject: National Research Council's 2015 report to BLM

Mr. Cain,

In reference to the proposed Mare Sterilization Research Environmental Assessment, I am providing you the following information in support of your analysis. This letter includes the internal deliberations provided to BLM by the National Research Council regarding the three proposed wild horse sterilization studies that would take place in Burns, Oregon.

On March 6, 2014, the BLM made public its request for applications to a research program titled "Wild horse and burro sterilization or contraception – development of techniques and protocols." The National Research Council provided scientific reviews of research proposals that BLM received in response. The National Research Council's report to BLM (NRC 2015) included a letter and two appendices. In order to ensure that the reviews of those proposals were rigorous, confidential, and unbiased, the specific critiques of proposals were sent to BLM as nonpublic attachments labeled Appendix A and Appendix B. I also note here that, for administrative reasons including available funding, the specific proposals that BLM chose to fund were a subset of the proposals recommended in NRC (2015).

In this letter, I am quoting, in their entirety, the paragraphs of text in Appendix A that pertain to the three Oregon studies under your consideration, other than personally identifiable information. These proposals were labeled proposals 8, 9, and 19 by the review committee of the National Research Council (2015). After that text I am also copying over complete page images from the specific reviews of those three proposals from Appendix B, except again with personally identifiable information removed.

Sincerely,

A handwritten signature in black ink that reads "Paul Griffin".

Paul Griffin

Literature Cited

National Research Council. 2015. Review of proposals to the Bureau of Land Management on Wild Horse and Burro sterilization or contraception; a letter report. Committee for the review of proposals to the Bureau of Land Management on Wild Horse or Burro Sterilization or Contraception. The National Academies Press.

Quoted text from Appendix A of NRC (2015), related to proposed Burns, Oregon studies
"Appendix A

Recommended Proposals

In its public session with the Bureau of Land Management (BLM), the committee understood that the agency was looking for research projects that would yield results quickly and ones that may take more time to come to fruition. With that in mind, it has grouped the recommended proposals into ones that can be completed and (if successful) have their results implemented in 2 years or less, ones that may yield practical results in the medium term (2–5 years), and ones that hold promise to yield results in the long term (5–10 years). A strategy for setting funding priorities among the projects and ways in which BLM could work with the investigators to strengthen their proposals are suggested in the last section of this appendix.

RESEARCH PROPOSALS ON STERILIZATION THAT COULD BE COMPLETED IN 2 YEARS OR LESS

The committee grouped Proposals 8, 9, 12, and 10 because they all focused on permanent sterilization through straightforward surgical procedures or, in the case of Proposal 10, a single injection. They all also had relatively low budgets and should be completed within 2 years. The committee believes that all four proposals feature methods that could be used safely in the near future (1–3 years from now) and therefore recommends them all for funding (Table A-1). When these research activities have concluded, BLM will be in a position to evaluate which approach or combination of approaches works best under what conditions, such as time of year, open or pregnant mares, stage of pregnancy, and the terrain and size of the population in the Herd Management Area where a gather, sterilize, and release program is planned. It can then proceed with the best options, having evaluated the merits of each approach. With regard to Proposal 10, the committee does not think that treatment of stallions will have an effect on the population growth rate of herds. However, BLM will capture stallions with mares and foals when it conducts gathers, and having an easy-to-apply, one-dose treatment option available for all mature animals would be optimal for the agency. It should fund Proposal 10 to verify whether such an injection can be safely developed for free-ranging stallions.

The committee also examined a proposal on conducting ovariectomies on free-ranging mares: Proposal 19, Functional assessment of ovariectomy (spaying) via colpotomy of wild mares as an acceptable method of contraception and wild horse population control; PI, [*personally identifiable information omitted here*]. Ovariectomy is regularly conducted on domestic mares, but some of the protocols used in domestic animals after surgery would not be applicable to free-ranging mares because they cannot be held still for 48 hours. The committee did not view this as a research proposal because the procedure is already done regularly in mares and therefore it contains no science or experimentation related to technique. For that reason, the committee did not group Proposal 19 with the research proposals listed in Table A-1. Nevertheless, it evaluated the usefulness of ovariectomy as a tool for population-growth suppression and the risks associated with it. Details of the committee's conclusions (including the effects of ovariectomy on fetuses before 90 days of gestation, from 90 to 120 days of gestation, and after 120 days of gestation) are in Appendix B. In short, the committee believes that this procedure could be operationalized immediately to sterilize free-ranging mares but that the techniques in Proposals 8, 9, and 12 would be less invasive. If the research projects of Proposals 8, 9, or 12 prove successful, their procedures should replace the procedure described in Proposal 19."

The following four pages are copies from NRC (2015) Appendix B, Proposal Review Comments. These are the reviews for the three proposed studies that would take place in Burns, Oregon, but with personally identifiable information redacted.

Proposal Number: 8

Proposal Title: Hysteroscopy and laser ablation of the oviduct papillas as a minimally invasive method of sterilization in standing, sedated wild horses and burros

Principal Investigator: [REDACTED] Oregon State University

Funding Recommendation: Fund.

COMMITTEE DISCUSSION SUMMARY

The objective of this proposal is to sterilize nonpregnant mares by hysteroscopic laser ablation of the oviductal papilla while the mares are under standing sedation. Fertility would be assessed by allowing treated mares to mate with a fertile stallion.

The committee finds the simplicity of this proposal to be its greatest strength. The procedure is minimally invasive and would require only restraint in the stocks with standing sedation. In practiced hands, the entire procedure should take 20–30 minutes per horse. With some training, many veterinarians could become proficient in performing this procedure. There is no question that the laser would damage the oviductal papilla. Whether the scar damage is sufficient to sterilize the mare permanently is the question at hand in this proposal.

The committee considered this proposal in conjunction with Proposals 9 and 12, which also aim to sterilize mares through minimally invasive procedures. The committee concludes that Proposals 8, 9, and 12 should all be funded. The budgets for these proposals are not large, and each should be completed in a short period (no more than 2 years). When these research activities have concluded, BLM would be in a position to evaluate which approach or combination of approaches works best under what conditions, such as time of year, open or pregnant mares, stage of pregnancy, and the terrain and size of the population in the Herd Management Area where a gather, sterilize, and release program is planned.

That being said, a number of improvements could be made in Proposal 8, and the committee is skeptical about one important factor. The committee is not confident that many mares gathered from an HMA would be eligible for this procedure because it is aimed at nonpregnant mares. Free-ranging mares are extremely sound reproductively, and many are in foal by the age of 2 years. Free-ranging mares that are not pregnant after the age of 2 years are probably subfertile. Therefore, the procedure would be applicable primarily to subfertile mares or yearlings that are 8 months old and/or weigh around 300 kg. The committee is not confident that many gathered horses will fit that description. It would not be practical to conduct a gather to perform only this procedure given the likelihood of a low number of candidate fillies and subfertile mares.

Regarding the low number of candidates for this procedure, the committee wonders whether inducing early embryonic death is acceptable. If it were acceptable, this procedure could be used in early spring in most mares. Abortion itself would not be induced because any embryos lost would simply be resorbed by the mare rather than expelled.

Another option would be to use this approach in tandem with the 1-year PZP vaccine. A gather could be conducted in year 1 to treat all captured mares with the PZP vaccine, after which they would be released. That would help to ensure a large number of nonpregnant mares when a gather occurred in the following year. That approach would add expense by requiring two

gathers in consecutive years, but infertility after the second year would be permanent (assuming that the procedure is successful), and the need for future gathers would be obviated for some time.

With regard to improving the proposal, many details are omitted or assumed by the investigators. The committee interprets the proposal to indicate that the investigators plan to use 50 mares from a BLM holding facility in Burns, Oregon. If that is the case, it could be stated more clearly. No control group of mares is mentioned. Similarly, it is not said how the fertility of the stallion given access to the mares would be determined. And, methods for capturing, sedating, and minimizing pain and stress in the animal are not described or addressed.

Another issue not addressed in the proposal is tubal pregnancies. The investigators report that if a mare is bred in the preceding 6-7 days, tubal pregnancy may result. In an animal with a 21-day cycle, 5% of open mares would be expected to be in estrus on any given day, so in 6-7 days as many as 30% of open mares could have been recently bred. Tubal pregnancy would be a painful, iatrogenic condition and should be considered as a welfare concern.

A proof-of-concept study could be carried out quickly with domestic mares before the technique is introduced to the horses in Burns or perhaps the step in Burns could be skipped entirely. Using domestic mares that could be easily handled would allow well-managed breeding (via artificial insemination) with semen of known fertility. Pregnancy status could then be diagnosed within 2 weeks of insemination. After proof of the concept, the technique could be moved into a free-ranging herd to test the difficulty of using it in true field conditions.

The committee was confused by the statement at the end of the proposal: "Beginning in the spring, assuming our experimental population has remained at Burns. . . ." It is not clear why the investigators cannot assume that the experimental population would still be available. If that population were not available, this would be another justification for conducting the experiment in domestic mares to which access could be guaranteed from the start to the finish of the experiment.

Finally, BLM would need to invest in many expensive endoscopes and have access to a number of trained veterinarians if the procedure is to have an effect on the population growth rate of a herd. The costs for the proposed project are appropriate, although the indirect costs included in the budget are higher than the 15% for the Wild Horse and Burro Program.

Proposal Number: 9

Proposal Title: Minimally invasive tubal ligation of wild horse and burro mares as a method of contraception and population control

Principal Investigator: [REDACTED] Oregon State University

Funding Recommendation: Fund.

COMMITTEE DISCUSSION SUMMARY

The procedure put forward in this proposal uses a flexible endoscope inserted through the anterior vagina to cauterize and transect the oviduct. Before treatment, the mare would be sedated, and then the abdomen would be distended with filtered air or carbon dioxide to aid in visualization of the ovaries and oviducts. The endoscope would pass through an incision in the anterior vagina and be used to visualize each oviduct, and the oviduct would be cauterized and transected. An epidural would be performed if necessary. The ligation of the oviduct would render the mare permanently sterile but still able to cycle normally. The investigators plan to perform this procedure on pregnant mares.

The committee is concerned that the ovaries may not be visible in late pregnancy because the mare's ovaries are pulled medially and anteriorly as the pregnant uterus moves over the pelvis and down to the floor of the abdomen. The collapse of the anterior vagina would also prevent passage of the endoscope in pregnant mares. Conducting this study would answer whether or not those concerns are warranted.

The committee considered this proposal in conjunction with Proposals 8 and 12, which also aim to sterilize mares through minimally invasive procedures. The committee concludes that Proposals 8, 9, and 12 should all be funded. The budgets for these proposals are not large, and each should be completed in a short period (no more than 2 years). When these research activities have concluded, BLM will be in a position to evaluate which approach or combination of approaches works best under what conditions, such as time of year, open or pregnant mares, stage of pregnancy, and the terrain of and size of the population in the Herd Management Area where a gather, sterilize, and release program is planned.

The committee offers some caveats regarding this proposal. The major risk to the mare would be abdominal pain in the 24 hours after the procedure. Injection of lidocaine or similar products into the ovary or oviduct during the procedure is not mentioned. Given the experience of some committee members, this additional step is recommended for pain management.

The proposal could be written more clearly and with more detail. It states that mares would be restrained in a hydraulic, padded chute that is specifically and successfully designed for routine processing of free-ranging horses. However, no further information is provided regarding animal-handling facilities. It is also unclear whether the investigators would have access to the number of animals (50) that are proposed for use in this study.

The committee is skeptical of the claim that four horses could be treated in an hour. Given the time needed to inflate the abdomen, two is more likely. There is also the issue of skilled practitioners: this approach would require more training than the form of sterilization discussed in Proposal 8.

The costs for the proposed project are appropriate, although the indirect costs included in the budget are higher than the 15% for the Wild Horse and Burro Program.

Proposal Number: 19

Proposal Title: Functional assessment of ovariectomy (spaying) via colpotomy of wild mares as an acceptable method of contraception and wild horse population control

Principal Investigator: [REDACTED] Oregon State University

Funding Recommendation: Fund with nonresearch money.

COMMITTEE DISCUSSION SUMMARY

This proposal focuses on demonstrating the value of ovariectomy in free-ranging horses. The investigator proposes to evaluate the feasibility of using surgery as a management tool in controlling the growth rate of free-ranging horse herds.

The proposal contains no science or experimentation related to technique. Colpotomy, as described in this proposal, is not a new technique; the only novelty in the proposal is that the procedure would be performed on free-ranging rather than domestic horses. The committee did not consider this difference to be a matter of research.

Nevertheless, the committee evaluated the proposal's usefulness as a tool for population growth suppression and the risks associated with it.

Ovariectomy via colpotomy is a relatively common procedure and a standard veterinary practice that is performed widely by practitioners in domestic horses. The death rate associated with the procedure is low. Domestic mares are typically cross-tied to keep them standing for 48 hours post-surgery to prevent evisceration through the unclosed incision in the anterior vagina. That protocol would not be possible with free-ranging mares because they cannot be held still for so long. Therefore, there is some concern that the investigator may see more fatalities after surgery than the 1% quoted in the protocol, which is based on domestic mares. The procedure should be 100% effective in sterilizing treated mares.

The proposal does not state at what early stage of pregnancy a mare would be excluded from the study. The mare's ovaries and their production of progesterone are required during the first 70 days of pregnancy to maintain the pregnancy. It is the opinion of the committee that if this procedure were performed in the first 90 days of pregnancy, the fetus would be resorbed or aborted by the mother. If performed after 120 days, the pregnancy should be maintained. The effect of ovary removal on a pregnancy at 90–120 days of gestation is unpredictable because it is during this stage of gestation that the transition from corpus luteum to placental support typically occurs. The proposal also does not state how long it would take to perform the procedure on a mare. That would be useful information for BLM to have in assessing its practicality.

The committee believes this procedure could be operationalized immediately to sterilize mares, with the caveat that fatalities may be higher than the 1% reported in the literature. The sterilization techniques put forward in Proposals 8, 9, and 12 would be safer—with less risk of hemorrhage and evisceration—and probably less painful. Therefore, if the techniques in Proposals 8, 9, and/or 12 prove to be successful after the research has been conducted, the committee thinks that these techniques should replace Proposal 19's method of ovariectomy via colpotomy as surgical approaches for permanent sterilization.

Ovariectomy

Ovariectomy is a procedure that generally is performed to remove an abnormal ovary. Occasionally, an ovariectomy is performed in fillies or mares which have particularly bad behavior during their heat cycle in an effort to make them more

By Michael Ball, DVM | Sep 17, 2001 | Article, Cancer, Mare Care, Veterinary Practice

ADVERTISEMENT

Ovariectomy is a procedure that generally is performed to remove an abnormal ovary. Occasionally, an ovariectomy is performed in fillies or mares which have particularly bad behavior during their heat cycle in an effort to make them more manageable. Ovarian problems that might indicate an ovariectomy include tumors, hematomas, and, rarely, abscesses.

Ovarian tumors account for approximately 6% of neoplastic (abnormal growth) conditions in the horse. The most common ovarian problem in the horse by and large is a granulosa thecal cell tumor. These tumors are benign in the sense that they do not metastasize (invade and spread to other parts of the body), but they can exert some severe physiological effects via hormones that they secrete (see below).

Another benign ovarian tumor that occurs in the mare is called a teratoma. Other malignant or invasive tumors do occur (carcinomas), but are rare when compared to granulosa thecal cell tumors. Hematomas are generally a result of excessive hemorrhage from an ovulated follicle and usually resolve spontaneously, but may take up to 3-5 months to do so. Ovarian abscesses are very rare.

As we discuss tumors, cancer, and the various “-omas,” I think it is again important to define the terminology as this is another area where words are often used inappropriately and confuse the true meaning of what we are trying to say. The following are defined by Dorland’s Medical Dictionary.

- **Tumor:** Latin for “swelling”—note that an abscess as well as a pimple could be called a tumor and does not necessarily mean cancer.
- **Cancer:** Any malignant cellular tumor.
- **The suffix -oma:** Latin for “a tumor or morbid growth.”
- **Carcinoma:** A malignant tumor (cellular) tending to invade local tissues and to give rise to metastases.
- **Malignant:** Having the properties of invasiveness and metastasis (malign is Latin for “bad or evil”).
- **Metastasis:** Transfer of disease from one organ or part of the body to another not directly connected to it (the movement of abnormal cells with respect to malignant tumors).
- **Benign:** Not malignant (Latin for “good or kind”).

Granulosa thecal cell tumors are large, benign, steroid-producing tumors that often are associated with behavioral changes and/or poor reproductive performance.

These tumors have been reported in mares of all ages, but have the highest frequency in mares between five and nine years of age. The abnormal cell growth occurs in cells that naturally produce sex hormones, i.e., testosterone, estrogen, etc., and therefore can cause excessive production of those hormones.

A common finding in mares with a granulosa thecal cell tumor which are exhibiting stallion-like behavior is a high level of the male sex hormone testosterone. The level of such hormones in the blood's serum can be measured, but, as can be imagined, in very small amounts. A serum level of 100 picograms/milliliter (that's 0.000000000001 grams) is generally associated with stallion-like behavior in a mare.

Other clinical signs are intermittent or continuous estrus and nymphomania, also related to excessive production of various sex hormone steroids by the abnormal ovary. If the mare is breeding, poor reproductive performance also is related to excessive hormone production. There is negative feedback on the normal ovary that essentially makes it small and inactive.

The second benign tumor is called a teratoma. Tera is Greek for "a wonder or a monster"; thus the monster swelling definition alludes to the character of this strange tumor. Teratomas are benign and do not secrete steroids that arise from "germ" cells within the ovary. Germ cells are the cells genetically programmed to become eggs and therefore contain the genetic material for all the components of the body. It is that fact that leads to the bizarre nature of these tumors; teratomas might contain cartilage, skin, bone, hair, nerves, and even teeth—something right out of the new TV series "Dark Skies." Because these tumors do not secrete sex hormones, there is no negative feedback on the other ovary and reproductive performance is generally not affected. These tumors are often discovered as incidental findings on reproductive examination.

The diagnosis of an ovarian abnormality is generally made by rectal palpation. Both ovaries can be evaluated in very good detail via rectal palpation. Complete examination is important. As mentioned above, in cases of ovarian hematoma and teratoma, the other ovary usually is functioning normally. In the case of granulosa thecal cell tumors, the other ovary is usually small and inactive.

History also plays an important role in diagnosis. Mares with granulosa thecal cell tumors often have behavioral changes as mentioned above and/or poor reproductive

performance if they are used for breeding.

Ultrasonography can be extremely valuable in assessing an ovarian mass. Hematomas have a characteristic ultrasonographic “texture,” as do granulosa thecal cell tumors and teratomas. Hematomas are usually a single mass with a very homogeneous texture, whereas granulosa thecal cell tumors generally are multiloculated, fluid-filled structures, but they also can be one large fluid-filled structure. When imaging a teratoma, there are often characteristic shadows caused by more dense structures such as teeth or bone.

Hormone assays can also be performed on the blood to gain laboratory support for the evidence of a granulosa thecal cell tumor. The levels of testosterone, estrogen, and progesterone can be quantitated, but not all granulosa thecal cell tumors produce enough of these to show a significant elevation.

It is a case where a positive test means something, but a negative test means nothing.

A newer test that measures the blood level of the hormone inhibin has been reported to be more accurate. The diagnosis of an abnormal ovary that requires removal usually can be arrived at given the history and findings of rectal palpation and ultrasonography.

Removing the Ovary

The decision to remove the normal ovaries from a filly or mare in an effort to eliminate behavioral problems during estrus must be carefully thought over for obvious reasons—once they’re gone, they’re gone! Certainty that the behavioral problem outweighs the breeding potential is paramount. My personal opinion is that all other potential causes for the behavioral problem should be ruled out and hormone therapy, such as Regumate or progesterone, should be proved ineffective.

The treatment of choice for granulosa thecal cell tumors is surgical removal. The surgical approach depends on the size of the abnormal ovary and preference of the surgeon. A common approach for tumors that are 15 centimeters or less in diameter is through the flank. The incision is made in the center of the para-lumbar fossa (flank) between the last rib and the point of the hip. This procedure is usually performed with the horse under general anesthesia, but occasionally is done with the

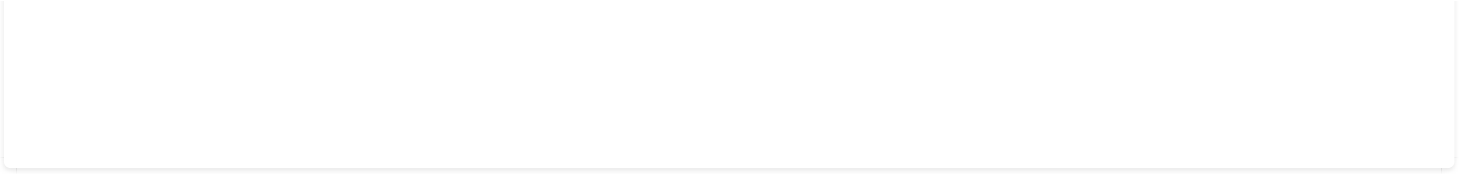
horse standing while under heavy sedation and local anesthesia. One of the main benefits to the flank approach is an overall decreased convalescent period. The other approaches that are performed if the tumor is large or out of surgeon preference via the ventral mid-line or low on the flank.

Once the ovary is exposed, regardless of the approach, the pedicle (connective stalk of the ovary) must be ligated in order to tie off the ovarian artery. The ovarian pedicle is composed of the ovarian artery and vein, nerves, and connective tissues. It is extremely important that the ligation be secure as fatal hemorrhage has been reported to occur via the ovarian artery. The pedicle can be ligated by hand, using suture material or more commonly using surgical stapling instruments. The use of surgical stapling instruments for aid in removal of ovarian tumors was reported in 1988 by Rick Duran, DVM, Diplomate ACVS, in the Equine Veterinary Journal. A 1993 article by Scott Palmer, VMD, Diplomate ACVS, in the Journal of the American Veterinary Medical Association reported on a standing laparoscopic laser technique for ovariectomy.

Another technique that is commonly used for the elective removal of normal ovaries for behavior modification is called a colpotomy. Colp is Greek for “vagina” and indicates the approach for this procedure. The horse is standing and heavily sedated and an epidural anesthetic is performed. An incision made deep inside the vagina above the cervix is the opening into the abdominal cavity for ovary removal. The ovarian pedicle is ligated by crushing and excised at the same time using an instrument called an ecraseur. Advantages of the method include being relatively inexpensive, not requiring general anesthesia, and not leaving an external scar.

Regardless of the method used for ovariectomy, this procedure is generally a painful one and the use of peri-operative analgesics is important. The horses often are hospitalized for 3-7 days and very carefully monitored in the immediate post-operative period for any signs of hemorrhage, which is a serious complication that can occur.

For mares which were showing behavioral changes related to a granulosa thecal cell tumor, their behavior rapidly (sometimes within a week) returns to normal. In addition, there is generally an improvement in reproductive performance in 5-6 months, although they might not begin cycling until the following spring, depending on the time of year the tumor is removed.



February 1, 2016

To Whom It May Concern:

I graduated from Veterinary School at the University of California, Davis (UCD) in 1983 and completed a three-year Surgical Residency at UCD in 1997. I have spent 33 years in solo and joint practices in northern California. My Sonoma-based solo practice includes a mix of concentrated barn show horses (hunter jumper, eventing, western and endurance disciplines), rural ranch horses, ranches that have mustangs (adopted from BLM), quarter Horses used for trail riding and a varied group of owners with geriatric and mini horses.

In 2012, I became the attending veterinarian for Montgomery Creek Ranch (MCR), a 2000-acre sanctuary that is home to 245 wild horses and burros. Only 45 horses at the ranch are being gentled/trained with the majority of the herd remaining wild.

Over the last three years, I set up a deworming/vaccination protocol for MCR, managed many emergencies involving complex lacerations (some standing/ some under injectable anesthesia), colics/chokes (combining NGT/laxatives/ fluids and IV fluids when necessary), septic foal management/plasma transfusions, angular limb splinting and prolonged care, splint fracture/club foot referrals of young horses for surgery, internal abscess diagnosis/prolonged antibiotic care, respiratory issues, radiographic evaluation of limb trauma/bone sequestra, performed dental care, complex management of a pregnant mare with Purpura Hemorrhagica/Strangles that resulted in abortion of the foal (due to the necessary treatment) and repeated uterine flushes to remove the retained placenta (the mare did survive), Ocular injuries, sedation for complex foot trims on some of the wild foals with conformational abnormalities and unfortunately managing the occasional septic joint/tendon sheath, extensive small colon impaction requiring euthanasia (surgical referral would have been impossible). And of course, I have performed many castrations of wild colts, stallions and burros.

None of these procedures could have been performed without a hydraulic chute as all the procedures required IV sedation and safe accessibility to the horses. My varied and extensive experience working on wild horses in a hydraulic chute has helped me become acutely aware of the benefits but limitations of this apparatus which is similar to the versions used at BLM facilities.

Because of the above experiences and particularly considering the complex sedation or anesthetic requirements of the wild horses I have treated, I can say without hesitation the mare sterilization research plan proposed by the BLM poses significant risk to the welfare, health and survivability of the mares used in this study. The proposed BLM project includes 225 mares being sterilized with one of three interventional procedures, the most concerning of which (Standing Colpotomy) will render mares Ovariectomized.

In domestic mares, this standing procedure has widely recognized, significant risks and has been replaced by Laparoscopy (though Ovariectomies are not a common surgery in domesticated mares). The risks associated with Colpotomies performed in wild mares are likely to be magnified to potentially life-threatening levels for multiple reasons.

Colpotomies are rarely performed in horses today. (The last and only one I witnessed was 35 years ago at UCD performed by a reproduction specialist). In 33 years of practice, I have referred two domesticated mares for unilateral ovariectomies done as flank procedures. During my surgical residency at UCD ('94-'97), I never performed or witnessed Colpotomies despite UCD's extensive caseload in the surgery department.

Historically, Colpotomies were occasionally done in some practices to manage adverse behaviors of mares, small tumors or to produce "jump mares" for breeding programs. With less invasive surgical procedures currently available and pharmaceutical options for behavioral issues (Altrenogest and Regumate), surgical management via Colpotomy is rarely considered in domestic mares.

Currently, when ovariectomies need to be done (to manage granulosa cell tumors for example), Laparoscopy is the procedure of choice unless the tumor is too large, in which case a ventral midline or flank approach (Laparoscopy site could be enlarged for smaller tumors) would be chosen. Only the affected ovary would be removed unless concern with the other. Incisions with Laparoscopy are small and external. Compared to Colpotomies, surgical prep is much less complex, visualization of the procedure is constant (not blind), surgical ligation is much safer (with Colpotomies, the ecraseur hopefully crushes the ovarian pedicle vessels adequately) and the risk of complications/peritoneal contamination/bleeding are much lower with ligation of the pedicle.

My specific concerns regarding the safety of the BLM's research project, as described in the "Mare Sterilization Research EA" include:

- 1). Sedative levels required to perform a painful, standing surgical procedure vary greatly in wild horses (often requiring 2-3 times (or more) doses used in domesticated horses). With painful stimuli or over/under sedation levels, some wild horses sit or lay down in the chute (very dangerous if the procedure is underway). Other horses tend to "explode" in the chute regardless of the "squeeze" being implemented and heavy sedation on board. In either case, if the ecraseur was being "crimped" and the mare reacted adversely resulting in dislodgement of the ecraseur, excessive/life threatening hemorrhage could result. The operator's arm could also be at risk of serious injury if the mare's position within the chute cannot be maintained.

(Adding an abdominal strap to hold the mare up would potentially compress the abdominal contents/pregnancy and make surgical approach even more difficult/more risky that abdominal contents (bowel) would be forced up in abnormal positions.

2). The success and safety of Colpotomies is partially dependent on the extensive surgical experience of the operator. Every board certified surgeon I spoke with expressed concern over Colpotomies being performed on these wild mares and in the proposed setting (BLM facilities) instead of in a surgical facility. Each of these surgeons reported experience with or anecdotal reports of complications to mares during and after Colpotomies. Each questioned the validity of using this procedure when less invasive, less painful, safer procedures could be chosen for these mares in this study.

(The validity of sterilizing mares in wild herds is another concern altogether and will be dealt with below.)

3). The post operative care/management proposed for these mares is minimal compared to the significant post operative recommendations for domesticated mares. These recommendations include keeping mares tied in a tie stall/tie line to prevent them from laying down/rolling to reduce risk of post operative hemorrhage or herniation of bowel thru the vaginal incisions that must be left open for second intention healing. These measures are advised since excessive post-operative hemorrhage or herniation of bowel thru the vaginal incisions would not be survivable.

The study proposed by the BLM includes one dose of Excede and a tetanus vaccine. I have concerns this antibiotic choice/protocol may be very insufficient to protect these mares post-operatively with the level of potential contamination likely with this procedure. Domesticated mares would be treated with a more aggressive antibiotic choice for 7-10 days post operatively (monitoring daily for complications). Insufficient antimicrobials could result in peritonitis (also not likely survivable). NSAIDs post-op are used to a limited degree for pain management since they can influence clot formation initially (since NSAIDs affect platelet function). The wild mares will not be provided with post-surgical pain relief, according to the study description and presumably turned out in a communal paddock with no restraint.

4). According to the description, Colpotomies will be performed on 100 mares, 75 of whom will be at various stages of pregnancy.

I have consulted with Dr. Mary Scott (a Diplomate with the American College of Theriogenologists) who also expressed experienced concern with the safety, efficacy and need of this procedure proposed in this projected study and setting. She confirmed that ovariectomy performed before 50 days of gestation will cause pregnancy loss. If Ovariectomy occurs between days 50 and 70 of gestation, many mares will abort. By 100 + days of gestation, the fetoplacental unit is providing significant hormonal support of the pregnancy and by that stage the ovaries are not essential to maintain a pregnancy. Research mares ovariectomized at 140-210 days of gestation did not abort. However, in a wild mare, the stress of surgery (particularly a painful, standing procedure) and potential for post-op infection are significant risks to

the maintenance of the pregnancy. Either or both could precipitate an abortion. Abortion in later stages of pregnancy can have its own set of complications.

The BLM has not addressed this risk or considered how post-procedure abortions/retained placentas resulting in complex care complications from retained placenta (necessitating uterine lavages to remove retained placenta remnants) or the management of compromised foals born prematurely... would be cared for.

5). Lastly I am concerned about the use of this procedure in the wild, due to the concerning potential disruption of the normal social behaviors of post ovariectomized mares and how this will affect their role within the herd once they return to their families.

According to Dr. Mary Scott: As described in a recent article in the Journal Equine Veterinary Education: following ovariectomy, the majority of mares will show heat (receptivity to the stallion) for prolonged periods of time. Dr. Scott explained that this has been shown to be due to secretion of hormones from the adrenal gland. Importantly, removal of the ovaries takes away the primary tissue that is capable of producing enough progesterone to completely block receptive behavior. The degree of receptivity can vary and an ovariectomized mare might initiate the social contact but not allow mating and this could result in aggression, chasing and injury for either the mare(s) or the stallion. It is my understanding that in a typical wild herd, the mares are bred by the stallion, become pregnant and the stallion and his band of pregnant mares coexist without sexual tension. I would be concerned if many mares in the herd were showing persistent receptivity, it would cause social havoc, including the potential for the OVX mares to migrate to other bands... with a re-occurring issue resulting in subsequent bands they attempt to join.

To summarize: introduction of ovariectomized mares to wild herds could be very damaging to the normal behavioral socialization/structure and healthy interactions of the bands.

Dr Scott's additional thoughts were:

"My opinion is that the predominating concern with the proposed study is the significant risk of Colpotomy to the health/life of the mares during the surgery and post operatively, because they are wild animals and cannot be handled or treated in the same manner as domesticated mares. To reduce the risk of evisceration of bowel through the Colpotomy incision, it is recommended that mares should be maintained in a tie stall for up to 7 days and then restricted to a small paddock turn out for 2 weeks following the surgical procedure. These guidelines were developed because the risk of post operative hemorrhage or evisceration are real".

6) I (Dr. Kelly) seriously question the validity or need for this procedure, given its risks and associated concerns. I understand that this project has been proposed to manage "overpopulation" in the wild herds in the US. I believe (from what I have heard) the PZP immunocontraceptive vaccine is a much safer, more cost-effective tool for

achieving this goal. Whether done yearly, every other year or even annually on partial herds in the West, population growth reduction will be achieved through rendering vaccinated mares infertile for a period of time. A benefit of PZP is that it can be applied via remote darting or hand injection, and has minimal impacts on behavior - horses retain their female/mare behavioral status in the herds/families in which they live. If mares are “spayed” they likely will not.

In conclusion, I believe that the BLM’s plan to conduct ovariectomy via in particular Colpotomy on wild mares is inappropriate and inhumane because: 1) the BLM is subjecting open and pregnant mares to a barbaric surgical procedure most DVM’s prefer to no longer use (because of the significant risks of life threatening complications of the procedure intra-operatively and inherent post op complication risks; 2) the BLM cannot provide wild mares with the very necessary post-operative management, a fact that will place the mares at higher risk of fatality post operatively than domestic mares; 3) the majority of mares in the study will be pregnant and will be at risk of abortion due to severe stress and significant physical compromise they will experience during the procedure. For these reasons, I do not believe that the BLM should proceed with this experiment. Much safer and less invasive options are available that maintain the normal herd behaviors and social interaction.

While the other proposed procedures - tubal ligation and hysteroscopically-guided laser ablation - hold greater promise because they are less invasive and do not involve removal of the ovaries, issues regarding monitoring, post-operative care and inappropriateness for pregnant mares remain. In addition, these procedures have never been performed in wild horses previously. As a result, they should be attempted on domestic mares first in order to evaluate any adverse effects post-procedure. In addition, currently the BLM intends to utilize as many as 125 horses in these procedures, however, the BLM could assess the potential for these procedures with a much smaller number of horses and still gain valid scientific results.

Thank you for your consideration.

Robin Kelly DVM
PO BOX 886
Kenwood, California 95452 (707) 775. 9501



July 24, 2011

Lance C. Porter
Field Manager
Rock Springs Field Office
Bureau of Land Management
280 Highway 191 North
Rock Springs, Wyoming 82901

re: Modified Decision Record, WY-040-EA11-124 (June 13, 2011/June 22, 2011)

Dear Mr. Porter:

I wish to put on record my strong objections to the decision of the Rock Springs Field Office to manage the wild horses on the White Mountain and Little Colorado HMA's as "non-reproducing" or "minimally reproducing" herds. If implemented, either plan would create a semi-free-roaming herd of domestic horses, where the Wild Free-Roaming Horses and Burros Act of 1971 (P.L. 92-195) requires that true wild horses belong.

I write as a Ph.D. zoologist with significant research experience in wild horse behavior and fertility control, and as a former member of the BLM's Wild Horse and Burro Advisory Board (1998-2000). As a member of the Advisory Board, I drafted the first set of BLM guidelines for the use of immunocontraception in wild horse herds (dated April 29, 1999).

The language of the Green River Resource Management Plan is very clear, and consistent with the stated goals of the BLM's Wild Horse and Burro Program. "The objectives for management of wild horses are to...protect, maintain, and control viable, healthy herds of wild horses while retaining their free-roaming nature." Neither the "non-reproducing herd" described in the June 13 Decision Record nor the "minimally-reproducing herd" described in the June 22 Modified Decision Record achieves those objectives.

The horse herds described in the decision records are not viable, and are not meant to be viable. Biologists speak of herd viability in two senses, demographic viability -- the ability to compensate for death or emigration of its members by reproduction and natural immigration -- and genetic viability, the ability to maintain sufficient genetic diversity to keep animals healthy, fertile and capable of raising healthy offspring. By design, the proposed management plans do not achieve herd viability under either definition. By sharply reducing -- or eliminating -- the reproductive capacity of the herd, it becomes unable to respond to environmental challenges or the loss of membership through attrition, and without intervention it will go extinct. Genetically, gelding (or spaying) removes the animal from the gene pool as effectively as if he (or she) had been removed from the range, thus further reducing the number of animals available to maintain

genetic diversity and accelerating inbreeding. From a genetic viewpoint, the projected population of 274 horses spread over two HMA's becomes only 97 horses if 177 of them are geldings. Under the original Alternative D, of course, the effective population size is intended to be zero. Under either scheme, AML would be maintained artificially by importing horses from other HMA's. From a conservation and population ecology viewpoint, these are no longer wild horses.

They would also not be wild horses from a behavioral viewpoint. They will not retain their "free-roaming nature," except in the literal sense that they will be able to move around the HMA's without physical restraint. Wild horses typically live in reproductive bands consisting of adult mares, their dependent offspring, and one or more stallions whose lives revolve around trying to protect mares from harassment by other stallions and securing exclusive reproductive access to the mares for themselves; and bachelor bands of stallions whose lives revolve around displacing band stallions and acquiring or re-acquiring reproductive access to mares. Mares, meanwhile, simultaneously bond to one another and compete with each other for access to water, food, and other resources for themselves and their foals. Neither geldings nor spayed mares participate in these fundamental processes of wild horse behavior. Since nearly 2/3 of the horses remaining on the HMA's under modified alternative D would be geldings, the population as a whole will not reflect wild horse behavior.

In that context, I refer also to objective 3 under the Green River Herd Management Plan, which is to "provide opportunity for the public to view wild horses." Under either alternative D, members of the public who view horses at these HMA's will be completely misled and mis-educated about the nature of wild horses and their behavior.

Since the mid-1970's, the BLM has looked to various fertility control technologies to reduce the "excess" population of wild horses. I have been involved with that effort since 1992, both as a researcher contributing to the testing of PZP immunocontraception of wild horses, and as a formal and informal advisor to the BLM on fertility control policy. I can personally attest that, with respect to PZP, BLM has moved very cautiously, subjecting proposed research projects to intensive scrutiny, and discussing, revising, and adopting strict and specific guidelines for its use. Before approving PZP research projects, the BLM has required extensive testing in laboratory and captive settings, detailed documentation of minor side effects, and maintenance of detailed records on treated individuals – even for minor variants of vaccines whose safety and efficacy have been scrutinized for decades. For field use, guidelines adopted by BLM require the adoption of detailed use protocols, extensive NEPA compliance and public involvement, population modeling (to demonstrate long-term viability under the prescribed treatment regime), and other conditions. All this scrutiny, evaluation, and planning has been directed at a vaccine that is demonstrably reversible, has no serious adverse health effects, has no disruptive behavioral effects, preserves genetic viability better than management by gather and removal, and is cost effective.

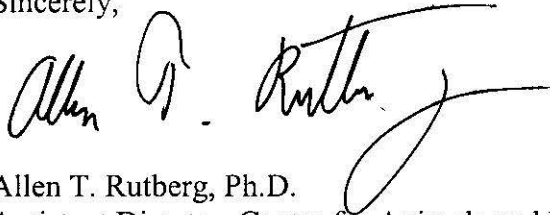
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To the individual wild horses, their bands, and their populations, the reproductive interventions described in Alternative D and Modified Alternative D are, by contrast with PZP, highly invasive, intrusive, and disruptive. Yet they have not been exposed to serious evaluation by either the agency or the public.

Given that PZP represents a better tested, better scrutinized, and far more benign management alternative for fertility control in wild horses; that the language of the Act dictates that, “All management activities **shall** be at the minimal feasible level” (§1333(a)); and that public input was limited to a 30-day comment period on a draft EA in which the proposed alternative was not chosen for implementation, I do not see a defensible justification for implementing the massive sterilization actions contained in the chosen alternatives.

I ask you to reconsider your decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen T. Rutberg". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Allen T. Rutberg, Ph.D.
Assistant Director, Center for Animals and Public Policy
Tufts-Cummings School of Veterinary Medicine

Disclaimer: The opinions expressed here are my own, and do not in any way represent those of Tufts University or any of its divisions.

Sworn Statement of Dr. Jay Kirkpatrick

1. I hold a B.S. in Biology from East Stroudsburg State College, and a Ph.D. in Reproductive Physiology from The College of Veterinary Medicine at Cornell University.

2. I currently work as the Director of The Science and Conservation Center in Billings, Montana. Prior to this position, I was an Associate Adjunct Professor in the Department of Population Health and Reproduction within the School of Veterinary Medicine at University of California, Davis. Concurrently, I was a Senior Staff Scientist for the Deaconess Research Institute in Billings, Montana. I also spent more than two decades working as an Associate Professor of Physiology in the Department of Biology at Montana State University-Billings, Montana. I also spent thirty years working with the U.S. Department of Interior, National Park Service, Bureau of Land Management (BLM), researching reproductive biology and chemical fertility control in wild horses.

3. For the past forty years I have dedicated my work as research scientist to studying wildlife fertility control. I have conducted research in a variety of areas including: reversible contraception in free-roaming herds, ovarian function in mares chronically treated with porcine zonae pellucidae (PZP), long-term effects immunocontraception of wildlife, and mechanisms of reproductive self-regulation in free-roaming ungulates. I was also integrally involved in the construction of a laboratory for wildlife immunocontraception research. In addition to this work, I have published more than seventy peer reviewed articles and peer reviewed book chapters on these topics.

4. Throughout my career I have been actively involved in many professional organizations. Since 1999, I have served as a Professional Fellow for the Association of Zoos and Aquariums (AZA), and for the past twenty years I have been a Member of the AZA

Contraceptive Advisory Group and the American Association of Zoo Veterinarians. In addition to these positions, I was a long-time member of the Society for Experimental Biology and Medicine and the Society for Study of Reproduction. A copy of my curriculum vita is attached, as Attachment A.

5. I have spent considerable time living, recreating, and working on the public lands in the Western United States, including six years working as a Park Ranger at Rocky Mountain National Park in Estes Park, Colorado. The wild horses that roam public lands are an integral part of the landscape and the ecological systems that comprise these areas.
6. I am familiar with the proposed BLM roundup in the Jackson Mountains Herd Management Area ("HMA"), which includes a proposal to return 44 geldings (castrated male horses) to the HMA. Based on my review of the pertinent scientific literature, I oppose this approach to herd management. It is extremely intrusive for the individual horses and not viable for the herds as a whole.
7. If stallions are sterilized as proposed by BLM, there will be massive changes in social organization and behavior. As a research scientist, current collaborator with the National Park Service with regard to wild horse management, and former BLM contractor who worked extensively on chemical fertility control in wild horses, I believe capturing and castrating – a non-reversible sterilization technique – wild male horses, and then releasing them back into the herds, is incompatible with the BLM's mandate to protect and retain the free-roaming nature of wild horses. This is true anywhere that BLM manages wild horses, meaning that geography plays no role in the level impact that would occur to horses and their herds as a result of this irreversible approach, because the impacts would be uniform across their range.

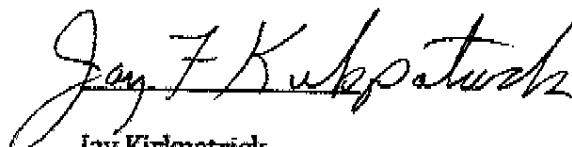
8. The very essence of the wild horse, that is, what makes it a wild horse, is the social organization and social behaviors that differ significant from domesticated horses. Geldings (castrated male horses) no longer exhibit the natural behaviors of non-castrated stallions. We know this to be true from hundreds of years' experience with gelded domestic horses. Furthermore, gelded stallions will not keep their bands together, which is an integral part of a viable herd. These social dynamics were molded by millions of years of evolution, and will be destroyed if the BLM returns castrated horses to the Jackson Mountains HMA.
9. Reproduction in male horses is a complex cycle that moves from the horse's brain to the testes and back again. Reproductive steroids, such as testosterone [T], affect the higher levels of the brain and cause a variety of a stallion's behaviors. These higher levels of the brain also send neural messages to the hypothalamus. The hypothalamus, in turn, stimulates the production and release of a protein hormone known as gonadotropin releasing hormone (GnRH). The GnRH, in turn, stimulates the anterior pituitary to produce and release follicle stimulating hormone (FSH) and luteinizing hormone (LH). The protein hormones stimulate the testes. Testosterone causes the aggressive behavior associated with successful stallions. These higher levels of the brain signal the hypothalamus to release GnRH, which in turn signals the pituitary to secrete FSH and LH. The FSH causes sperm production and the LH causes the testes to produce testosterone, which then feeds back to the brain, and on and on. This is a serious and significant alteration of normal physiological and behavioral functions for horses so treated and again, inconsistent with the law.
10. A major flaw in the plan to geld stallions and return them to the range both generally and at the Jackson Mountains HMA, is the fact that this will have absolutely no effect on reproductive rates of mares on the same range. As long as the harem band is intact and a

fertile stallion is at the head of it, mares will get pregnant regardless of the number of gelded stallions on the range. Indeed, the proposed action calls for 78 stallions (in addition to 44 geldings) – which is many more than is necessary to impregnate the 52 mares that will remain in the HMA. Further, gelded male horses will not become harem stallions, affecting social dynamics and behavior. But, beyond that, as explained above, the gelded stallions no longer even represent wild horses; they will quickly become the biologic anomaly that domestic horses have become. Finally, an emphasis on male fertility control to attempt to limit reproduction and “manage” any population of wildlife (deer, elk, horses) is superfluous; females have offspring – not males. Thus, as BLM has long recognized, population growth suppression must focus primarily, if not only, on limiting female reproduction. Since gelding does not further that goal, there is no scientific basis for returning geldings to the Jackson Mountains HMA under the circumstances.

11. The age priority given in the EA for removal actually runs counter to the objective of slowing reproduction. The removal of young animals from mares simply increases reproductive performance of those mares, a phenomenon known as compensatory reproduction (see Kirkpatrick and Turner 1991, *Compensatory reproduction among feral horses*. *J. Wildlife Manage.* 55:649-652). This action simply exacerbates the situation. Instead removal should focus on mares in the primary reproductive age class of five to ten years.
12. Castrating horses will effectively remove the biological and physiological controls that prompt these stallions to behave like wild horses. This will negatively impact the place of the horse in the social order of the band and the herd. For this reason, I oppose the BLM’s proposed method of managing the Jackson Mountains HMA. There are less intrusive, more humane, and more sustainable forms of fertility control available to the BLM, which find

much more support in the scientific literature, and which comport with BLM's past understanding and handling of these issues with respect to wild horse population control.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


Jay Kirkpatrick

Executed this 25th day of April, 2012.

RESEARCH ARTICLE

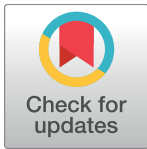
Reimmunization increases contraceptive effectiveness of gonadotropin-releasing hormone vaccine (GonaCon-Equine) in free-ranging horses (*Equus caballus*): Limitations and side effects

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Abstract

Wildlife and humans are increasingly competing for resources worldwide, and a diverse, innovative, and effective set of management tools is needed. Controlling abundance of wild-life species that are simultaneously protected, abundant, competitive for resources, and in conflict with some stakeholders but beloved by others, is a daunting challenge. Free-ranging horses (*Equus caballus*) present such a conundrum and managers struggle for effective tools for regulating their abundance. Controlling reproduction of female horses presents a potential alternative. During 2009±2017, we determined the long-term effectiveness of GnRH vaccine (GonaCon-Equine) both as a single immunization and subsequent reimmunization on reproduction and side effects in free-ranging horses. At a scheduled management roundup in 2009, we randomly assigned 57 adult mares to either a GonaCon-Equine treatment group ($n = 29$) or a saline control group ($n = 28$). In a second roundup in 2013, we administered a booster vaccination to these same mares. We used annual ground observations to estimate foaling proportions, social behaviors, body condition, and injection site reactions. We found this vaccine to be safe for pregnant females and neonates, with no overt deleterious behavioral side effects during the breeding season. The proportion of treated mares that foaled following a single vaccination was lower than that for control mares for the second ($P = 0.03$) and third ($P = 0.08$) post-treatment foaling seasons but was similar ($P = 0.67$) to untreated mares for the fourth season, demonstrating reversibility of the primary vaccine treatment. After two vaccinations, however, the proportion of females giving birth was lower ($P < 0.001$) than that for control mares for three consecutive years and ranged from 0.0 ± 0.16 . The only detectable adverse side effect of vaccination was intramuscular

L14AS00048) to DLB. Additionally, NPS provided funding (2008–2010), as well as significant in-kind support each year of the investigation.

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swelling at the vaccination site. Regardless of vaccine treatment (primary/secondary), approximately 62% (34/55) of immunized mares revealed a visible reaction at the vaccine injection site. However, none of these mares displayed any evidence of lameness, altered gait or abnormal range of movement throughout the 8 years they were observed in this study. Our research suggests that practical application of this vaccine in feral horses will require an initial inoculation that may provide only modest suppression of fertility followed by reimmunization that together could result in greater reduction in population growth rates over time.

Introduction

Anthropogenic disturbance of landscapes and natural resources is pervasive across much of the earth, resulting in increased conflict between humans and wildlife and a need for effective resource management [1]. Humans indeed have tried to control animal abundance in some capacity for over 13,000 years [2]. Regulating abundance of wild animals using fertility control or contraception is a relatively new development, emerging only 50 years ago [3]. Such tools are appealing to wildlife managers and stakeholders because they present a non-lethal solution for regulating abundance when species pose a risk to human interests and safety, and when wildlife densities are high enough to disrupt ecosystem function [4,5].

Feral horses (*Equus caballus*) present perhaps one of the most unique wildlife management problems worldwide. Humans have spent centuries propagating and dispersing domestic horses to every continent except Antarctica over the last several centuries, only to have inadvertently created expansive feral populations that now compete with humans, wildlife, and domestic animals for resources [6]. The unique relationship between humans and horses has resulted in a precarious dichotomy, with the struggle for relief from conflict and resource competition challenged by a mutualistic societal view where feral horses are perceived as part of our social environment. This struggle is elevated in the United States, where federal law (*P. L. 92±195*, as amended) provides protection for feral horses and burros (*Equus asinus*) on large expanses of public land, and establishes guidance for their management as a wildland species [7].

Current methods of population control for free-ranging horses in the U.S. involve periodic removals and adoption or sale of surplus animals, or maintaining excess animals in long-term holding facilities which are expensive, resource intensive, and unsustainable [8]. Clearly, more efficient, cost effective, and humane approaches to reducing feral horse densities on public lands are needed. Controlling the fertility of female horses offers a potential complementary or alternative strategy for limiting the growth of some populations [9].

A promising immunological approach to contraception in feral horses and other wild ungulate species involves immunization against gonadotropin-releasing hormone (GnRH), a small neuropeptide that performs an obligatory role in mammalian reproduction [10]. When conjugated to a highly immunogenic carrier protein and combined with a potent adjuvant, GnRH vaccination actively stimulates a persistent immune response resulting in prolonged antibody production against endogenous GnRH. These antibodies induce transient infertility by binding to GnRH, thus preventing attachment to receptors on pituitary gonadotropes, suppression of gonadotropin release, and ultimately ovulation in females [11, 12]. As anti-GnRH antibodies decline over time, the availability of endogenous GnRH increases and treated animals generally regain normal fertility [13±17].

The GnRH-based contraceptive agent known as GonaCon-Equine (National Wildlife Research Center, Fort Collins, CO, USA; [18] is registered by the United States Environmental Protection Agency as a restricted-use pesticide for contraception of adult female feral horses and burros. A single immunization with this or earlier versions of this vaccine (more generally referred to as GonaCon) have been shown to induce extended infertility (≥ 2 yr) in numerous wild ungulate species including captive and free-ranging elk (*Cervus elaphus*) [15±17] white-tailed deer (*Odocoileus virginianus*) [18±20], bison (*Bison bison* [21]), and feral horses [22± 24]. However, multiple years of infertility are only experienced in a fraction of vaccinated animals. In free-ranging elk, for example, there was approximately a 90% treatment effect the first year after vaccination but this declined to 50% by the second year; with no measurable effect by year three [16]. Similar declines in effectiveness have been reported for captive feral horses treated with the same vaccine [22].

Booster vaccinations generally result in a more profound and longer-lasting antibody production due to the anamnestic (cell memory) response [25]. Traditional veterinary vaccinology suggests that non-replicating vaccines most often require two initial doses 2±6 weeks apart followed by booster vaccinations every 1±3 years [26]. Repeat immunizations using a variety of GnRH vaccines in domestic horses improves contraceptive efficacy and suppress behavioral and physiological estrus [27±29]) However, these GnRH vaccines differ from GonaCon-Equine in that they incorporate different protein carrier molecules and adjuvants, and are formulated for short duration (< 1 yr.) effectiveness. They are also administered on a more traditional vaccination schedule with a primary set of immunizations followed by periodic boosters.

Other forms of wildlife fertility control vaccines have adopted comparable initial and booster recommendations [30±32]. However, this intensive vaccination schedule places significant logistical barriers on application in free-ranging animals. GonaCon vaccine is formulated with highly immunostimulating mycobacteria as a component of the adjuvant. This may prolong the initial and subsequent booster vaccination windows for optimum efficacy as initial antibody concentrations are maximal 2±12 months post-primary vaccination [15]. GonaCon vaccine is one of the rare exceptions among animal vaccines in that the formulation initiates high antibody titers that remain elevated in some individuals after a single-injection ; however, little research has been conducted to evaluate booster doses of this vaccine in any free-ranging wild ungulate [17, 24] or domestic species [33]. While a single immunization against GnRH may be preferred from a practical perspective, there may be a more optimal vaccination schedule that balances the need for minimizing animal handling or contact while maximizing vaccine effectiveness. Thus, it's imperative to investigate the safety and long-term effectiveness of repeat vaccination and to evaluate its potential to limit fertility in this long-lived and perennially pregnant species.

In female wild ungulates, adverse side effects following a single immunization against GnRH appear to be minimal. Evaluation of biological side effects has been reported for numerous wild ungulate species including white-tailed deer [13, 34], elk [15, 16, 35], feral pigs [36], bison [21], and free-ranging horses [17, 24]. A summary of results from these investigations indicate that GonaCon is reversible, safe for use in pregnant females, does not significantly change social behaviors [37] or negatively affect neonatal development, survival, or maturation [15, 35]. No adverse effects of vaccination have been shown to be related to general health, body condition, blood chemistry parameters, or hematology of treated animals. The most apparent pathological side effect has been the development and persistence of non-debilitating granulomatous and often purulent inflammation at the site of injection. In all studies, where post-mortem examinations have been conducted, injection-site lesions were pervasive, but in some species, such as white-tailed deer and elk, they were not apparent antemortem. Likewise,

in cases where injection-site reactions have been documented, no clinical evidence of lameness, impaired mobility, or depression, have been reported [13, 15–17, 21, 24, 34, 35].

While documentation of contraceptive efficacy and side effects of GonaCon have been described for a variety of wild ungulates, similar evidence for feral horses is limited. To our knowledge, only two long-term (≥ 3 years) empirical investigations have been conducted using GonaCon-Equine. These include a clinical trial with captive feral mares [22] and the other with free-ranging mares in a natural environment [23]. In the study with free-ranging horses, vaccination significantly reduced foaling rates of treated females, however, effectiveness was inconsistent over time and was substantially lower than that reported for captive feral mares treated with the same vaccine [22]. Furthermore, neither of these studies integrated revaccination as a strategy to increase vaccine efficacy. Lastly, these inquiries provide little quantitative evidence of the reversibility of the effects of this vaccine, the presence or absence of adverse side effects related to inoculation of pregnant mares, and neither examined the potential for increased side effects with reimmunization.

Knowledge of the effects of GonaCon-Equine on equid fetal health, neonatal survival, and body condition is largely anecdotal, whereas injections site reactions to booster immunization and the efficacy of revaccination are limited to two investigations [24, 33]. Clearly, additional research is needed to further define the long-term therapeutic effectiveness and contraindications of this potential technology before resource managers can make informed decisions regarding its practical application for stabilizing the growth rate of free-ranging feral horse populations.

Consequently, the fundamental objectives of this investigation were: 1) to determine the duration, effectiveness, and reversibility of both a single immunization and subsequent reimmunization against GnRH in suppressing reproductive rates of free-ranging mares in a natural environment, 2) to determine the safety and adverse side effects (if any) in free-ranging mares including assessment of general health, body condition, effects on current pregnancy, injection site reactions, and neonatal health and survival and, 3) to compare the effects of a single vaccination against GnRH on time budgets and social behaviors [37] to similar behaviors following reimmunization. Based on evidence from prior studies with feral horses and other wildlife species, we predicted ($H_{1.}$) that a single vaccination against GnRH would suppress fertility for multiple years with decreasing effectiveness over time but would not result in permanent infertility. Furthermore, we surmised ($H_{2.}$) that the anamnestic immune response to revaccination would be more effective and longer lasting in suppressing fertility than the initial immunization alone. Moreover, we reasoned ($H_{3.}$) that except for localized inflammatory reactions at the injection site, we would not observe other adverse side effects (i.e. lameness, detrimental effects on existing pregnancy, neonatal health and survival, body condition, behavioral changes). Apart from determination of return to normal fertility of treated mares, these objectives and hypotheses were addressed and accomplished in this investigation.

Materials and methods

Study area

We conducted this research in the South Unit of Theodore Roosevelt National Park (THRO), USA (45°55'N/103°31'W). This unit is located near the town of Medora in southwestern North Dakota and encompasses approximately 19,000 ha of native vegetation. The landscape is topographically diverse and consists of eroded badlands with gullies and ravines separated by relatively large upland plateaus and small erosion-resistant buttes capped by scoria. Elevation ranges from 683 m to 870 m. Its continental climate is characterized by short, arid summers (mean temperature 21°C) and long, cold winters (mean temperature -12°C) [38].

Precipitation is irregular in amount and distribution with a long-term annual mean of 38 cm with most of this falling as rain showers from April to June [39].

Vegetation is primarily mixed-grass prairie dominated by needle-and-thread grass (*Hesperostipa comata*), western wheatgrass (*Pascopyrum smithii*), threadleaf sedge (*Carex filifolia*), blue gramma (*Boutelous gracilis*), and little blue-stem (*Schizachyrium scoparium*). Cottonwood (*Populus deltoides*) gallery forests occur along perennial water courses while hardwood stands of green ash (*Fraxinus pennsylvanica*) and chokecherry (*Prunus virginiana*) dominate the upland drainages. Dense stands of Rocky Mountain juniper (*Juniper scopulorum*) are common on steep north-facing slopes [40].

Besides feral horses, sympatric wild ungulate species include bison, elk, mule deer (*Odocoileus hemionus*), white-tailed deer, and pronghorn (*Antilocapra americana*). Horses and bison are confined to the South Unit of the Park by a 1.8 ± 2.4 m woven-wire boundary fence. Currently, horse numbers are controlled through periodic live capture and removal of select individuals. Free-ranging horses at THRO are classified by the National Park Service (NPS) as "feral livestock" and managed as a "historical demonstration herd". The most recent estimate of population size (2017) is 150 ± 175 horses and the Park has set a management goal for this herd at approximately 50 ± 90 animals.

The social structure of this population consists of 14 ± 16 social groups (bands) that include a single dominant stallion, subdominant stallions, and 1 ± 5 adult mares, yearlings, and foals of both sexes. Males greater than 1 year of age that have not acquired a band are usually found in ephemeral bachelor groups of 3 ± 6 individuals. These bands are non-territorial and are spatially distributed across the South Unit primarily east of the Little Missouri River. All horses are known by unique coloration and markings and have been previously identified and assigned individual identifiers by managers. Photographs of each animal from birth to adulthood assist in the identification of individuals. Age, reproductive history, and genealogy data for each animal has been maintained since 1993.

In spring/summer 2009, we collected pre-treatment data on all mares and bands within THRO. The purpose of this effort was: 1) to determine the sample size and sampling intensity required to achieve acceptable statistical power ($\geq 80\%$) to detect fixed differences ($\geq 50\%$) in foaling proportions of experimental groups, 2) to assess unknown logistical limitations of locating and identifying specific study mares within bands of horses, and 3) to train field technicians to observation protocols, and collect pre-treatment time budget and social behavioral data.

Experimental animals and treatments

Primary vaccination (2009–2013). During a scheduled management roundup at THRO (18–23 October 2009), 160 horses were guided by helicopter into permanent corrals and handling facilities. An attempt was made to capture the entire population to maximize sample sizes for this research project and to remove excess horses to meet desired herd management objectives. A total of 57 adult mares (2 ± 17 years of age) and associated foals, and band stallions, were captured, identified, treated, and retained in the Park for this experiment. Using a randomized complete block design, we established two experimental groups consisting of a Gona-Con-Equine treatment group ($n = 29$) and a saline control group ($n = 28$). Mares were paired (blocked) based on age and pregnancy status such that animals within a block were as similar as possible. Within each block, individual mares were then randomly assigned to either a control or treatment group.

Equine veterinarians and a reproductive specialist, blinded to treatment status, assessed the general health, body condition, pregnancy status, and approximate gestational stage of each

mare. We determined pregnancy status and gestational age by transrectal palpation and ultrasonography of the reproductive tract [41]. We collected whole blood (up to 50 mL) via jugular venipuncture (BD Vacutainer SST; Becton Dickinson and Co., Franklin Lakes, NJ) then centrifuged these samples at the capture site, and temporarily stored serum in cryovials at -20°C . We later transferred frozen serum on dry ice to Fort Collins, Colorado, where it was stored at -80°C . We also assessed serum for exposure to common pathogens known to cause abortions in horses (e.g. equine herpesvirus-1, equine infectious anemia, equine viral arteritis and contagious equine metritis) that could confound the interpretation of treatment-induced infertility [42].

We applied treatments while mares were restrained in a squeeze chute. Females in the treatment group received an intramuscular injection in the lower left gluteal musculature, by hand-held syringe (18-gauge, 3.8 cm needle) containing GonaCon-Equine (2.0 mg GnRH conjugate + adjuvant; 2.0 mL). The vaccine contained multiple synthetic copies of GnRH coupled to a large immunogenic carrier protein (Blue Carrier; Biosonda, Santiago, Chile) that was combined with a water-in-oil adjuvant containing killed *Mycobacterium avium* ssp. *avium* (Adju-Vac, National Wildlife Research Center) [18]. Mares in the control group were injected in a similar manner, with an equal volume of physiologic saline solution (0.9% NaCl; 2.0 mL). We chose to inject the vaccine into the gluteus muscle (~ 15 cm distal to the point of the hip) rather than the neck because of greater safety for hand-injection, enhanced detection of potential injection site reactions under field conditions, and the preferred location for potential remote dart delivery of the vaccine.

Secondary vaccination (2013±2017). Four years later, during 23±25 September 2013, we similarly rounded up the entire THRO horse population and moved and handled them through existing corrals and chute systems to remove excess animals from the Park. Given this unique opportunity and endorsement from the Park, we retained all available mares previously immunized and control mares, retreated them, assessed pregnancy status, and determined body condition using techniques identical to those applied at the 2009 roundup. Two mares in the control group and 4 mares in the treatment group died between 2009±2013 and therefore, were not available for this experiment. We attributed these mortalities to malnutrition, dystocia, broken appendage, and unknown causes not related to treatments. The one exception in our 2013 protocol was that we injected the booster vaccination into the opposite (right) hip from where the primary (left hip) vaccination was previously administered. This provided the opportunity to simultaneously evaluate injection site reactions related to both immunizations. Treatment mares again received 2.0 mL GonaCon-Equine and control mares 2.0 mL saline.

Field measurements

Using 2±3 trained technicians and occasional equally trained volunteers, we conducted field measurements and observations consistently from year to year. Prior to field observations, technicians were provided with photographic images of individual horses and required to recognize them by band association, natural markings, and pelage coloration. They were also trained or had previous experience in identifying prepartum characteristics of pregnancy (e.g., enlarged abdomen, mammary gland development, waxing teats, behavior, etc.), as well as, body condition scoring, and the appearance and classification of injection site reactions to the vaccine. We collected all data from ground surveys (foot, vehicle, horseback) using binoculars and spotting scopes. Although technicians were unaware of treatment assignments of individual mares, the presence of injection site reactions in several GonaCon-treated mares could have revealed their treatment designation.

Reproduction. We predicted that pregnant females inoculated with GnRH at the fall gathers of 2009 and 2013 would give birth to a healthy foal the following spring (2010 or 2014) and presumably be infertile during subsequent breeding seasons. Thus, the effects of the primary or booster vaccinations on reproduction (foaling proportions) would not be observed until the 2011 and 2015 foaling seasons, respectively. These are the first breeding seasons that a treatment or retreatment effect on mare fertility could be detected when using foaling observations to assess successful contraception by the vaccine.

We determined the effectiveness, duration of effects, and reversibility of the primary and booster vaccinations on reproduction by comparing foaling proportions of treated and control mares during 1 March to 31 December 2009±2017. We chose to use the term vaccine “effectiveness” rather than “efficacy” because it more realistically represents how GonaCon-Equine affects fertility under more natural field conditions compared to a controlled clinical trial [43, 44]. We defined vaccine effectiveness (VE) as the proportional reduction in annual foaling (F = number of mares with a foal/ total number of mares in a treatment group) between control and treated mares. Vaccine effectiveness is equivalent to relative risk reduction (RRR) in medical statistics and was calculated from the risk ratio ($RR = \frac{F_{Trt}}{F_{Con}}$) where F_{Con} = foaling proportion of the control mares, and F_{Trt} = the foaling proportion of the treated mares. Risk ratio was calculated using the *fmsb* package in program R [45±47] and we then solved for VE as follows:

$$VE = \frac{F_{Con} - F_{Trt}}{F_{Con}} = 1 - \frac{F_{Trt}}{F_{Con}} = 1 - RR$$

Each year of the study, we estimated annual foaling proportions by locating all bands to identify individual mares and determine the presence or absence of foals. During the intensive sampling period (1 March±1 August), we attempted to observe 95% or greater of all experimental mares and foals (when present) at least weekly and 100% of them every two weeks, then opportunistically until 31 December. We did not attempt to assess contraceptive effect based on visual characteristics of pregnancy but did use these criteria to prioritize weekly observations of individual mares. Instead, we defined foaling as a parturition event or neonatal foal by side, as detected by direct observation. We matched foals with dams through observations of nursing and repeated close association during feeding, bedding, and traveling [48, 49]. We collected neonatal data at first sighting of a foal and estimated date of birth by observing the foal's level of activity, presence of an umbilicus, and elapsed time since the dam was last observed pregnant [50]. We photographed and estimated the age of each new foal when first observed, recorded its sex, general health (vigorous, average, poor), markings, and band association, and gave it a unique identifier; then entered these observations into a herd database. Finally, we assessed the utility of using foaling proportions as a proxy for pregnancy proportions by comparing pregnancy proportions determined at the time of each gather in 2009 and 2013 to foaling proportions observed in 2010 and 2014.

Side effects

Behavioral. We repeated three behavioral measurements with the same treatment groups of mares that were previously conducted during an earlier phase of this project [37]. We proposed that, if greater contraceptive effectiveness after reimmunization against GnRH was achieved, it would potentially provide a larger and more statistically powerful sample size of contracepted animals in which to detect behavioral changes related to this vaccine (if they occurred).

We completed an intensive behavioral study during an earlier phase of this larger GnRH study during 2009±2010 [37]. To make these analyses directly comparable to that prior study, we followed the same behavioral sampling design as that described previously [50]. Briefly, this included blocking observations into three daylight time periods (08:00±12:00 h, 12:01±16:00 h, and 16:01±20:00 h) with observations conducted during the primary breeding season, 1 March±1 August 2014. Each observation session included collection of a 20-min instantaneous scan sample of time budgets at 1 min intervals for each adult band member (≥ 1 year old), and all-occurrence data collection for social interactions [37].

Primary behavior categories included feeding, resting, locomotion, maintenance, and social behaviors [51]. Social behavior data included herding, reproduction, agonism, harem-tending, and harem-social behavior, and were collected at all occurrences throughout the observation sessions. Harem-social behavior was not collected through all-occurrence sampling in our previous study; however, it was collected during the scan sample in the previous study and was worthy of further consideration here. We defined this category as interactions between two individuals that did not meet the definition of the other all-occurrence behaviors (e.g. allogrooming and non-reproductive olfactory investigation).

We observed all horses from the nearest distance that did not elicit attention to the presence of the observer, typically 50±200 m. All observations were conducted using a 15±45 × 600 mm spotting scope or 10 × 42 mm binoculars when the distance between horses and observers was too far to allow unassisted detailed observation. We observed each band of horses weekly or bi-weekly in conjunction with other field assessments.

Physiological. Concurrently with foaling and behavior observations, we evaluated and compared potential adverse side-effects of treatment on injection-site reactions, body condition, success of existing pregnancy, and neonatal survival in treated and control mares. We made assessments of these potential side-effects monthly during the primary foaling season and opportunistically for the remainder of the year. We observed each mare for the presence or absence of visible lesions, swellings, or discharge at the injection site. In addition, we documented evidence of lameness (e.g. limping, gait alteration, reluctance to stand or bear weight on a limb), as well as behavioral depression, muscle tremors, or other systemic reactions that could be related to the vaccine treatment. We classified injection-site reactions according to the following criteria: 1) **abscess**±an open sore usually with fluid drainage or discharge, 2) **swelling**±a raised area of tissue of variable size and shape with no visible fluid drainage, 3) **lameness**±any abnormal range of movement or stiffness in the leg where the vaccine injection was delivered, 4) **none**±no observable reaction [52]. These categories were not mutually exclusive with respect to a single observation and both sides of the animal were observed, when possible. For these observations, we approached as near as possible to individual horses (≤ 50 m) and assessed and photographed each injection-site reaction for later evaluation. At the same time, we visually evaluated body condition of each mare and scored condition as previously described [53]. We evaluated the success of the existing pregnancy by comparing foaling proportions between treated and control groups in 2010 and 2014. We measured neonatal survival as the proportion of foals surviving to 14 days of age and post-natal survival to 200 days.

Statistical analysis

Reproduction. Yearly foaling data are reported as the proportion of mares observed with a foal in each group. We used asymptotic approximation to the binomial distribution to compute 95% confidence intervals for these proportions using package *binom* in program R [45, 47]. We used a risk ratio analysis ($\alpha = 0.05$) to compare all observed annual proportions between treatment groups. We used the same method to evaluate the success of the existing

pregnancy between groups during the first foaling season post-vaccination (2010 and 2014). All comparisons between treatment groups were made within a single year and without multiple testing corrections.

Behavior. We used the same statistical approach for the analyses in 2014 as that used in 2010 [37]. We modeled the frequency of each behavior using mixed-effects linear regression, where individual female identity and sampling time (time of day) were included as random effects on the intercept term of each model. This accounted for variation that may have been present among individuals who were sampled repeatedly, though not always equally over time, and for temporal variation in behavior when samples were not equally collected across all times of the day. Time budget behaviors sampled at 1-min intervals were aggregated into proportion of time spent per behavior to calculate an independent measure of behavior per observation session. We used the *lme4* package of R version 3.1.2 (The R Foundation for Statistical Computing 2014) and SYSTAT 12.02.00 (SYSTAT Software, Inc. 2007) to calculate descriptive statistics and obtain mixed-effects model estimates using restricted maximum likelihood [54]. Separate models were fitted for each time budget behavior with the fixed effects of treatment group (treated or control), foal presence (dependent foal < 1 year of age present with the female, or no foal present with the female), female age, and band size. In the previous study, we considered band fidelity (number of times a female moved bands within a year), but data were too homogeneous to consider that factor in 2014: only 8 horses moved bands at all (4 treated/4 saline) and five of those moved collectively to a different stallion.

Physiological. We used descriptive statistics (arithmetic means with \pm 95% CI) to compare, occurrence of lesions at the injection site and 1-tailed Fisher's exact test ($\alpha = 0.05$, 1df) to compare foal survival proportions of treated females to that of controls. We used normal binomial distributions to compute confidence limits for the differences between proportions using Jeffrey's interval for small sample sizes [55]. Effects on body condition scores were examined using generalized linear models in the *lmer* package in program R [56]. We employed random effects for year and individuals and then compared this nested model to full models which added the effect of either treatment or foaling using an ANOVA.

This research was approved by the Institutional Animal Care and Use Committees of the National Park Service (NPS) (Permit Numbers: MWR_THRO_Baker_Horse_2013.A3, MWR_THRO_Baker_Horse_2015.A3) and Colorado State University (IACUC Protocol No. 17-7651A). This study was conducted in accordance with good laboratory practices (GLP) and oversight from United States Department of Agriculture/National Wildlife Research Center (No.QA1647). All data collections were conducted after obtaining a scientific collection permit issued by Theodore Roosevelt National Park (THRO-2010-SCI-0010). All work, other than animal handling and vaccination at the two feral horse roundups, was observational. Every effort was made to prevent and minimize disruption of natural band dynamics and individual horse behavior and well-being during handling and treatment application.

Results

The statistical process used to select experimental mares for this investigation resulted in two treatment groups that were relatively homogeneous in age, body condition, body mass, and pregnancy status [S1 Table]. Results of pregnancy assessment indicated that most mares were pregnant at the 2009 (0.86 (49/57), 95% CI = 0.74 \pm 0.93) and 2013 (0.90 (46/51), 95% CI = 0.79 \pm 0.96) roundups, thus providing sufficient opportunity to evaluate and compare the safety and potential side effects of vaccine treatment on pregnancy and neonatal survival.

Transrectal ultrasonography revealed that the fetuses of most pregnant females were approximately 120+ days old at the roundup and that most had descended over the pelvic rim

preventing a more accurate assessment of gestational age at treatment application [57]. To provide a more precise estimate, we used an estimated gestation period for horses of 342 days [58] and the approximate foaling date (± 5 days) of each mare in 2010 and 2014 and then back-calculated to the date of treatment application at the 2009 (18 ± 23 October) and 2013 (23 ± 25 September) roundups. Using these calculations, we estimated mean gestational age at vaccine inoculation in 2009 to be 162 days (95% CI = 150 ± 175) for treated mares and 154 days (95% CI = 138 ± 170 days) for control mares. For 2013, we used the same calculation and projected that, on average, females were reimmunized against GnRH at approximately 129 days (95% CI = 105 ± 151 days) of gestation and saline-treated control mares at 132 days (95% CI = 119 ± 144 days).

Following the 2009 and 2013 roundups and release, experimental mares distributed themselves among 16 ± 19 individual bands. At least one treated or control mare was present in all bands during 2010–2017. Likewise, the composition of adult mares in each band, as well as the band stallions, remained relatively stable during this period. By the end of the 2017 foaling season, 14% (4/29) of treated mares and 11% (3/28) of control mares had died of various causes (e.g., malnutrition, broken appendage, dystocia, unknown causes). Except for these mares and one vaccinated mare that was not re-captured at the 2013 gather, all others were observed for foaling and other field measurements for all eight years of this investigation.

We met our sampling objective by observing more than 95% of all mares weekly (and sometimes more often) from 1 March to 1 August each year of the study. It is possible that some foals were born and died without being detected but given the intensity of the sampling observations, we feel that this was highly unlikely. Observations during the remainder of the year and following winter were less intense and more opportunistic depending upon available personnel, weather, and road conditions. During this time, mortality of foals was more likely to have gone undetected.

Vaccine effectiveness

Primary vaccination (2009–2013). Mean foaling proportions of treated (0.62 (18/29) 95% CI = 0.44 ± 0.79) and control (0.68 (19/28) 95% CI = 0.50 ± 0.85) mares during the 2009 pre-treatment foaling season were not different ($P = 0.65$) indicating that prior to contraception, treatment groups exhibited equal fertility [S1 Table]. Further evidence was provided by individual mares at the 2009 gather and primary vaccine inoculation. The proportion of treated (0.86 (25/29), 95% CI = 0.71 ± 0.95) and control (0.85 (24/28), 95% CI = 0.70 ± 0.95) mares determined to be pregnant, via transrectal ultrasonography, were not different ($P = 0.63$) [S1 Table, Fig 1]. This provided an opportunity to compare the effects of GonaCon-Equine vaccination on the existing pregnancy of treated mares and neonatal health and survival to that of untreated control mares. Foaling proportions of treated (0.68 (19/28) 95% CI = 0.50 ± 0.85) and control (0.64 (18/28), 95% CI = 0.46 ± 0.82) mares during 2010 were not different ($P = 0.78$) (Fig 1). Births occurred from early March to early September with 97% (35/36) observed during the first four months of the foaling season (1 March to 1 June). Average foaling dates in 2010 for treated and control mares were 5 May (95% CI = 22 April–18 May) and 10 May (95% CI = 25 April–25 May), respectively. No foal was detected for 12 mares (6 treated: 6 control) that were determined to be pregnant at the 2009 gather. None of these mares showed evidence of pregnancy during the intensive foaling period or for the remainder of the year. We surmised that most of these foals were either aborted or died as neonates between the periods from 20 October 2009 (gather) to 1 March 2010 (beginning of foaling observations). Regardless of timing or cause of death, the proportion of mares that foaled in

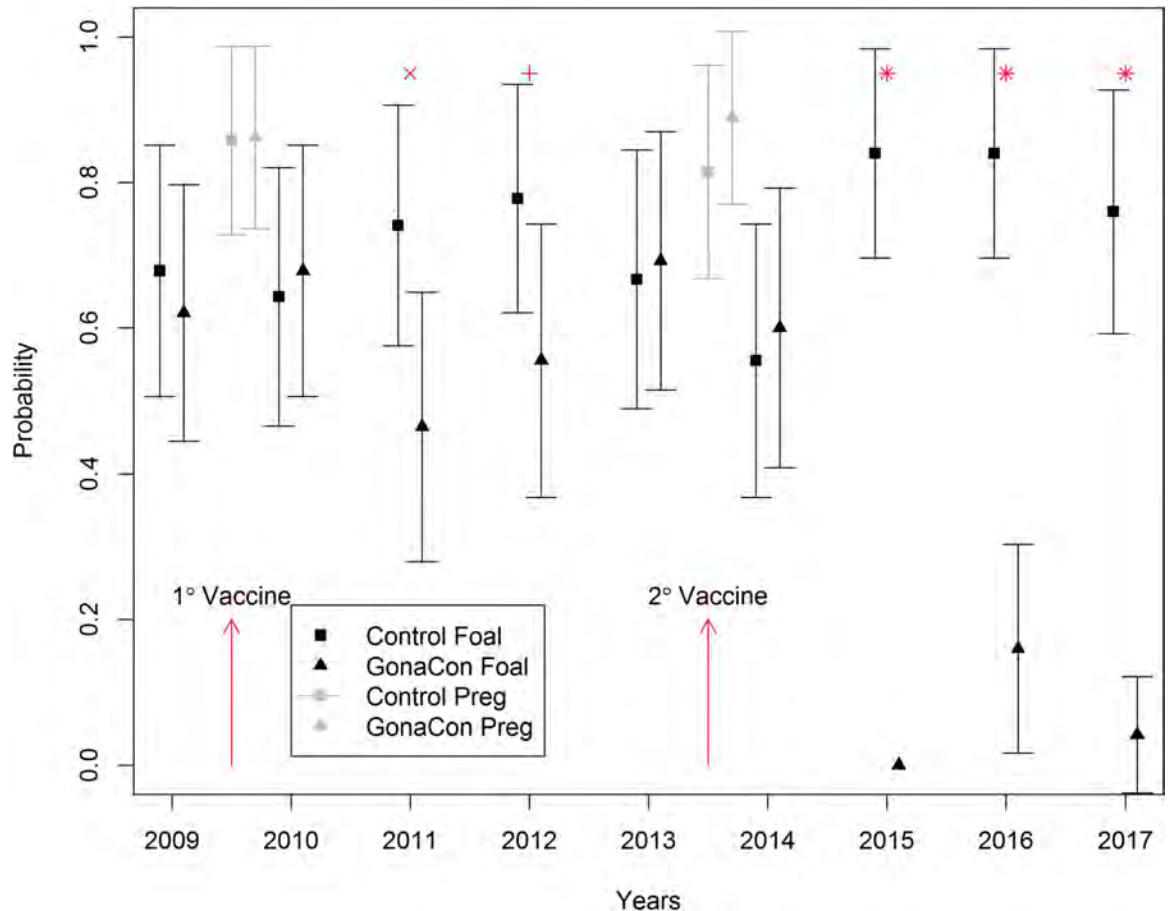


Fig 1. Comparative probability of foaling and pregnancy for treatment and control groups of free-ranging feral horses (*Equus caballus*) mares selected for this experiment. Mares were treated with a primary vaccination of GonaCon-Equine in October 2009 and then reimmunized with the same vaccine in September 2013 at scheduled gathers at Theodore Roosevelt National Park, North Dakota, USA. GonaCon vaccinations occurred at the time points represented by the red arrows. Symbols correspond to observed p-values for relative risk comparisons between treatment groups within years (p-value between 0.05 and 0.1 = +, for < 0.05 = x, and for < 1×10^{-05} = *).

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2010 underestimated the proportion of mares that were determined to be pregnant at the 2009 gather by 24% for treated mares and 21% for control mares.

Estimated age of all foals at first observation was 2.4 days (95% CI = 1.7 ± 3.1 days). Most neonates (97%), from both experimental groups, were classified as vigorous and in good to excellent condition when first observed. Neonatal survival rate from parturition to 14 days of age was estimated to be 0.95 (18/19, 95% CI = 0.75 ± 0.99) for foals born to GonaCon-treated females and 0.88 (16/18, 95% CI = 0.64 ± 0.98) for foals born to control mares ($P = 0.54$). After 14 days of age, post-neonatal survival rates (14±200 da) averaged 0.97 (30/31, 95% CI = 0.84 ± 0.99) and were similar for both experimental groups ($P = 0.57$). These results support our prediction (H_3) that inoculation with GonaCon-Equine vaccine, during approximately the second trimester of pregnancy, does not affect the existing pregnancy of treated females or neonatal health and survival.

The proportion of treated mares that foaled (13/28) following a single vaccination was lower than that for control mares (19/26) for the second (2011) ($P = 0.04$) and third (15/27 vs 21/27) (2012) ($P = 0.08$) post-treatment foaling seasons but was similar (18/26 vs (18/27)

($P = 0.67$) to control mares for the fourth (2013) season, demonstrating reversibility of the primary vaccine treatment (Fig 1). Even though we observed a significant reduction in foaling proportions between treated and control mares during 2011 and a declining effect in 2012, therapeutic effectiveness and relative risk reduction estimates were low to modest and estimated to be 0.37 (95% CI = 0.01 ± 0.60) and 0.28 (95% CI = -0.06 ± 0.51), respectively (Table 1). These findings lend support to our hypotheses (H_1) that a single vaccination with GonaCon-Equine is reversible and suppresses fertility for multiple years post-treatment in a portion of treated animals but with diminished effectiveness over time.

Secondary vaccination (2013±2017). At the scheduled gather in October 2013, we extended our evaluation of GonaCon-Equine by assessing the effects of revaccination on fertility and safety in these same experimental mares treated four years after the primary vaccination. Evidence of similar fertility for individual mares was demonstrated at the 2013 gather, where pregnancy proportions of treated (0.92 (23/25), 95% CI = 0.75 ± 0.98) and control (0.88 (23/26), 95% CI = 0.71 ± 0.96) mares were similar ($P = 0.86$) [S1 Table]. Except for one treated and one control mare, all others had conceived and given birth to at least one foal during 2009±2013. For the 2013 foaling season, foaling proportions of treated (0.69 (18/26), 95% CI = 0.51 ± 0.87) and control (0.66 (18/27) 95% CI = 0.49 ± 0.84) mares were not different ($P = 0.84$) providing additional evidence that treatments groups were of equal fertility prior to reimmunization (Fig 1).

Like 2010, mean foaling proportions during the first post-treatment foaling season (2014) were not different ($P = 0.74$) between treated (0.60 (15/25), 95% CI = 0.41 ± 0.79) and control (0.56 (15/27), 95% CI = 0.37 ± 0.74) mares (Fig 1) supporting similar observations in 2010 that revaccination could be applied to pregnant mares, during mid-gestation, without risk to the existing pregnancy. Foaling date distribution was comparable to that observed in 2010 following the primary vaccination. Average foaling date for treated mares was estimated to be 27 April (95% CI = 5 April± 20 May) and 19 April (95% CI = 6 April± 2 May) for controls. No foal was observed for 15 mares (8 treated: 7 control) that were determined to be pregnant at the 2013 gather. Like 2010 estimates, foaling proportions underestimated pregnancy proportions determined at the 2013 gather for both treated and control mares by approximately 30% and 34%, respectively (Fig 1). These data, together with similar observations in 2010, support the inference that foaling proportions are not an accurate proxy for pregnancy proportions but provide a limited but practicable field measurement for determining contraceptive

Table 1. Comparative relative risk reduction (RRR), 95% confidence intervals, and p-values associated with differences in foaling proportions between GonaCon-treated and control mares during 2009±2017.

Year	Relative Risk Reduction	95% Confidence Interval		p-value
	(RRR)	Lower	Upper	
2009	0.0852	0.3757	-0.3402	0.6500
2010	-0.0555	0.2750	-0.5301	0.7797
2011	0.3732	0.6028	0.0109	0.0381*
2012	0.2857	0.5178	-0.0581	0.0861
2013	-0.0384	0.2826	-0.5032	0.8430
2014	-0.08	0.3216	-0.7194	0.7482
2015	1	1	NA	2.57E-09*
2016	0.8095	0.9236	0.5247	1.94E-06*
2017	0.9451	0.9920	0.6217	4.15E-07*

*Significant p-values (<0.05).

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effectiveness. Average foal age at first observation across both treatment and control groups was 2.6 (95% CI = 1.5±3.3) days. Nearly all foals born to revaccinated and control mares were classified as vigorous and found to be in good to excellent condition when first observed.

Neonatal survival rate to 14 days of age for foals born to revaccinated mares was 0.87 (13/15), 95% CI = 0.62±0.96 and 0.93 (14/15), 95% CI = 0.70±0.98) for foals born to control mares ($P = 0.49$). After 14 days of age, post-neonatal survival rates were 0.80 (12/15), 95% CI = 0.55±0.92) for revaccinated mares and 0.73 (11/15), 95% CI = 0.48±0.89) for control mares ($P = 0.55$). These results reflect similar findings following a primary vaccination with GonaCon-Equine and reinforces the deduction (H_3) that reimmunization is safe for treatment of pregnant females and does not affect neonatal or post-neonatal health or survival when applied at approximately mid-gestation.

Unlike results from the single vaccination trial, we observed, not only highly significant reduction in foaling proportions between treated and control mares following reimmunization but also a remarkably effective contraceptive response. Except for the first foaling season following treatment application, (2014) in which the vaccine was not expected to have an effect ($P = 0.75$), foaling proportions in reimmunized mares were lower ($P < 0.001$) than that for control mares for all subsequent years (2015±2017) (Fig 1). This was particularly evident for the second post-treatment foaling season (2015) when none 0.00 (0/25), 95% CI = 0.0) of the reimmunized mares produced a foal while the proportion of control mares foaling was estimated to be 0.84 (21/25, 95% CI = 0.69±0.98). During the third post-treatment foaling season (2016), four treated mares produced a foal resulting in a foaling proportion of 0.16 (4/25), 95% CI = 0.01±0.30) while the proportion of control mares foaling was identical to that observed in 2015 (Fig 1). These foals were determined to be vigorous and in good to excellent condition at birth, however, two of these foals, born in September, were not observed the following spring and were categorized as post-natal mortalities and presumed to have died during winter (2016/2017).

In 2017, no additional treated mares produced a foal or showed evidence of pregnancy. However, one of the treated mares that had foaled in 2016 died of apparent natural causes (age-related malnutrition) during 2017 and two other revaccinated mares that had foaled in 2016 failed to produce a foal that year resulting in a foaling proportion of 0.041 (1/24), 95% CI = 0.03±0.12) (Fig 1). The foaling proportion for mares in the control group (2017) was 0.84 (21/25, 95% CI = 0.69±0.98) and higher ($P < 0.001$) than that for GonaCon-treated mares (Fig 1). It should be noted that the apparent decrease in foaling proportions in GonaCon-treated mares from 2016±2017 and resulting increase in vaccine effectiveness (Table 1) is likely due to the inherent error associated with the small sample size ($n = 4$) of mares in this treatment group that regained fertility. Overall, there was both a substantial decrease in foaling proportions (Fig 1) and an exceedingly high level of effectiveness (Table 1) for treated mares compared to controls for 3 years post-revaccination (2015±2017) ($P < 0.001$). Thus, fertility measurements during 2015±2017 support our prediction (H_2) that revaccination with GonaCon-Equine would be more effective in suppressing foaling proportions in treated females compared to controls than a single immunization (Fig 1, Table 1).

Side effects

Behavioral. We collected behavioral data on 73 feral horses (22 males, 25 treated females, 26 saline females) for 218.3 h in 2014. The median age of observed stallions was 12 years (range = 9±19 years), median age of observed control females was 8 years (range = 7±20), median age of observed treated females was 9 years (range = 7±22), and median band size was 8 horses (range = 2±14). There were no differences detected between treatment groups in any

time budget behavior category (Table 2). As band size increased, feeding decreased 1.24% (95% CI = 0.48 ± 2.00) per additional horse in the band. Likewise, locomotion increased 0.20% (95% CI = 0.07 ± 0.33) and maintenance decreased 0.10% (95% CI = 0.01 ± 0.19) per additional horse in the band.

Foal presence influenced locomotion, with barren females moving 1.24% (95% CI = 0.40 ± 2.08) more than females with dependents. Foal presence also influenced the social behavior component of time budgets, with barren females interacting with others 2.74% (95% CI = 0.59 ± 4.90) more than females with dependents.

Variance among individuals had little influence on any of the behaviors modeled (Table 2). Variance was also minimal between time periods of observation; however, there were some significant differences in amount of activity by time of day. An estimated 6.88% (95% CI = -0.73 ± 14.5) more feeding occurred in the 1601±2000 h time-period than did earlier in the day, and this was reciprocated by an estimated 3.33% (95% CI = 1.09 ± 7.79) less resting, 0.34% (95% CI = 0.15 ± 0.82) less maintenance, and 1.30% (95% CI = 0.51 ± 3.11) less social behavior during the same period.

There were no differences detected between treatment groups in herding, reproduction, or agonism, but treatment group did influence harem-social behavior. Observed instances of harem-tending behavior provided too few data to model. Because these social behaviors were not as dependent on other broad categories as is the case with compositional time budgets [51], we re-estimated the social behavior models with only treatment and supported effects to allow for clearer interpretation of the results.

Stallions initiated harem-social behavior 13.9% (95% CI = 3.25 ± 24.68) less toward control females than toward treated females. Though all harem-social records were analyzed as a group, it should be noted that 55.8% of the 308 harem-social events were sub-categorized as allogrooming. While the significant difference between treatment groups was detected, the variance among individuals for this behavior was near zero (Table 2).

Physiological. No study mares exhibited antibody titers to any of the infectious diseases that were surveyed for (i.e., equine herpesvirus-1, equine infectious anemia, equine viral arteritis and contagious equine metritis) thus eliminating this factor as a potential cause of infertility in GonaCon-treated females.

No control mares, treated with saline, showed any evidence of injection site reactions. Swelling and discharge were never observed in this group. Likewise, these mares showed no evidence of lameness or gait abnormalities in either hind limb. Consistent with our hypothesis (H_3), approximately 72% of treated mares (21/29) displayed a visible reaction at the site of injection after a single vaccination with GonaCon-Equine (S1 Photo). A single mare developed a draining abscess after the initial vaccination. These lesions were persistent over multiple years. At the time of the 2013 roundup and revaccination, 81% (21/26) of vaccinated mares continued to have palpable swelling at the original site of vaccine injection.

Like initial vaccination reactions, during the first-year post-revaccination, approximately 50% (13/26) of mares continued to show swelling on the left hip at the site of the 2009 injection and 50% developed a reaction on the right hip at the site of revaccination in 2013. Two of these new reactions were draining abscesses. Yet again, injection site reactions were persistent with approximately half of the mares with swellings at one or both injection sites, 3 years after revaccination. None of the GonaCon-treated mares displayed any evidence of lameness, altered gait or abnormal range of movement throughout the 8 years they were observed.

While body condition varied between individuals and study years, it did not vary between treatment groups ($P = 0.14$) over the course of the study. Likewise, there was no effect of presence of a foal on body condition ($P = 0.16$). Average body condition ranged from 3.7 ± 4.9

Table 2. Treatment and supported effects in a mixed-effects linear regression of feral horse (*Equus caballus*) time budget behaviors (e.g. feeding, resting, locomotion, maintenance, social) and all-occurrence social behaviors (e.g. herding, reproduction, agonism, harem- social) at Theodore Roosevelt National Park, USA. Variance for the random effects of time of day (j) and individual horse identity (k) are shown as σ_j^2 and σ_k^2 .

Behavior	Effect	t	P	Difference	95% confidence limit		σ_j^2	σ_k^2
					Lower	Upper		
Feeding	Treatment	-0.125	0.900				0.004	0.003
	Band Size	-3.193	0.001	-0.012	-0.020	-0.005		
Resting	Treatment	0.590	0.555				0.001	0.001
Locomotion	Treatment	-0.143	0.886				<0.001	<0.001
	Band Size	3.047	0.002	0.002	0.001	0.003		
	Foal Presence	2.900	0.004	0.012	0.004	0.021		
Maintenance	Treatment	-1.193	0.233				<0.001	<0.001
	Band Size	-2.238	0.025	-0.001	-0.002	-0.001		
Social	Treatment	-0.037	0.970				<0.001	0.001
	Foal Presence	2.499	0.013	0.027	0.006	0.049		
Herding	Treatment	-0.909	0.368				0.009	<0.001
Reproduction	Treatment	1.555	0.159				<0.001	<0.001
Agonism	Treatment	0.669	0.528				<0.001	0.048
Harem-social	Treatment	2.620	0.012	0.140	0.033	0.247	0.007	<0.001

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(moderately thin to moderate body condition) for all study animals over the 8 years that mares were observed. Individual body condition scores ranged from 1±7.

Discussion

Reproduction

This study demonstrated that a single vaccination against GnRH, using GonaCon-Equine, administered during mid-gestation, was safe, initiated short duration (2 yrs.) infertility in some mares, and was reversible, but was minimally effective in reducing fertility of treated females compared to controls. For two foaling seasons following vaccine treatment, we observed statistically significant reductions (28±38%) in foaling proportions of treated versus control mares but no effect by the third-year post-treatment, thus confirming the reversibility of the vaccine.

These results parallel similar findings from other experimental evaluations of GonaCon-Equine reported for captive and free-ranging mares. In a comparable study in Nevada with feral horses in a natural environment, GonaCon-Equine reduced foaling proportions by an average of 33% over a 3-year period but, like our study, contraception was only modestly effective over this period [23]. In contrast, contraceptive effectiveness of captive mares treated with GonaCon was greater and longer lasting (≥ 4yrs) than either of these studies [22]. The disparity between captive and free-ranging animals in contraceptive response to GonaCon vaccine is not limited to feral horses but has also been observed between captive and free-ranging white-tailed deer [14, 18, 20] and elk [15, 16, 19]. Although these investigations did not suggest a definitive causation for these differences, they all pointed to suppressed and less persistent GnRH antibody concentrations in free-ranging ungulates compared to their captive counterparts suggesting a relatively compromised or weakened immune response to the vaccine that resulted in reduced contraceptive effectiveness.

It is widely acknowledged that differences in vaccine effectiveness can be attributed to increased environmental stressors (i.e., nutritional status, injuries, parasite load, pathogen exposure, and social dynamics) that can inhibit a more vigorous immune response in free-

ranging animals in a natural environment [59, 60]. It follows that while efficacy trials with captive animals can provide an important first approximation of vaccine safety and performance under controlled conditions; they may offer only limited inference to free-ranging animals that are not buffered against natural stressors that may decrease immune response and vaccine effectiveness. Regardless of the factor(s) contributing to the limited effectiveness of GonaCon in free-ranging animals, it appears that the immune response from a single vaccination does not consistently provide multiple years of infertility in all or even a high proportion of these animals.

In comparison to a single inoculation with GonaCon-Equine, the effect of reimmunization on foaling proportions was highly significant which allowed clear differentiation between treated and control mares for multiple breeding seasons. Compared to a single vaccination, reimmunization of mares in this study resulted in a much higher (58%) average vaccine effectiveness (range = 0.80 ± 0.94) than the single vaccination for a 3-year period (2015 ± 2017). Likewise, this level of effectiveness following reimmunization was on average higher than that previously reported for free-ranging mares treated with a single application with GonaCon-Equine [23] and 32% above what was reported for captive mares treated with the same vaccine formulation [22]. These results support the conclusion that a booster immunization with GonaCon-Equine can provide a highly effective, multi-year suppression of fertility in free-ranging horses and these results may be consistent in other animal species, as well.

It is fundamental knowledge that a secondary response to a vaccine generally results in a more rapid production of antibodies that are produced in greater amounts and over a longer time compared to the primary vaccination [25]. Repeat immunizations using a variety of GnRH vaccines in domestic horses have been shown to improve contraceptive efficacy. However, unlike commercially available short duration vaccines (< 1 yr.) developed for domestic horses [29, 61], GonaCon-Equine is formulated by combining a non-biodegradable oil in water-based emulsion and an optimum concentration of immunostimulatory killed mycobacteria to form a depot usually deep in muscle tissue. This depot injection is thought to allow for a slow release and prolonged stimulation so that the formulation can act for much longer periods of time (years) than is possible with standard injections (months). This effect is thought to be responsible for the extended antibody response of 3 ± 4 years in vaccinated deer [14, 18, 20, 62], elk [15, 16], and horses [22].

While this response was not unexpected, the magnitude and duration of effectiveness of GonaCon-Equine following revaccination, even 4 years after the initial vaccination, is salient and relevant to the management of fertility in free-ranging horses. First, it demonstrates that a booster vaccination can stimulate a highly effective immune response that can result in multiple years (≥ 3 yrs.) of contraception. Second, it provides an initial reference point for defining the optimum revaccination schedule required for long-term reproductive management of female horses in a natural environment. And finally, it supports the consideration that while a single application may be preferred from a practical management perspective, GonaCon-Equine is more effective, in free-ranging horses, if repeat vaccinations are delivered on a periodic basis. While initial results are encouraging, additional research is needed to complete the objectives of this study including: 1) to define the duration of effective contraception post-revaccination, 2) to determine if long-term or permanent infertility is a possible outcome, and 3) to assess if return to fertility (if it occurs) results in altered birth phenology of treated mares. We will investigate these questions over the next three years of this study. Additionally, there may be a more optimal revaccination schedule which allows for altered duration of effectiveness or is more conducive to management schedules.

Side effects

After revaccinated in October 2013, time budget and social behaviors of mares in spring/summer of 2014 were comparable to those observed during the same period in 2010, following the initial treatment in October 2009. We found no evidence of differences in frequency or intensity of social behaviors including estrous behavior associated with treatment. Both treatment and control groups displayed few estrus behaviors in either 2010 [37] or during 2014. Behaviors associated with estrus were observed only 17 times in treated and 57 times in control mares out of 1148 observed social behavior events. This supports our earlier findings that pregnant mares rarely show overt estrous-related behaviors and similarly GonaCon-Equine treated mares only occasionally display these behaviors, although each for different reasons. Once a mare is pregnant, progesterone likely subverts much of the estrous type behavior that would generally be displayed with high estrogen levels, and only occasionally do domestic horses display and stand for mounting when pregnant [63]. Relatively small amounts of estrogen are secreted as follicles develop and then regress. In the absence of progesterone, relatively small amounts of estrogen are likely sufficient to induce erratic estrous behavior as was observed in these mares. However, the small amounts of estrogen were likely insufficient to induce an LH surge and subsequent ovulation.

Regardless of the underlying endocrinology associated with these behaviors, vaccinated and control mares both displayed social interactions that maintained herd structure; herding, tending, and defending behaviors from the stallion; and social hierarchies. The only meaningful factor that influenced the amount of time spent in social behaviors (e.g. allo-grooming, herding and tending) was the presence or absence of a foal. Mares with foals spent more time alone with the foal than those without off-spring, which is to be expected given their social and nutrient requirements during the neonatal and post-natal periods [50]. It is possible that long-term absence of foals could influence social behavior on a longitudinal scale, but additional studies are needed to investigate such phenomena on an appropriate time scale.

Other techniques for reducing the fertility of free-ranging species, such as vaccination with the native porcine zona pellucida vaccine (PZP) and tubal ligation, maintain the competency of the endocrine aspects of fertility. This can lead to unintended consequences with repeated estrous cycling in polyestrous species. In fact, in a population of white-tailed deer, where most reproductive females had received tubal ligations, fawning was negligible; however, there was more than a 700% increase in the number mature males attracted to the area occupied by a high number of estrous cycling females [64]. Similarly, PZP vaccination has extended the length and intensity of breeding seasons in horses [49, 65±68], deer [69, 70], and elk [71]. GonaCon-Equine may avoid these inadvertent consequences by functionally inducing mimicry of pregnancy in females which continues to be an important part of the social structure of the group but does not invite intense adverse breeding behaviors.

Researchers have generally hypothesized that by alleviating the energetic demands of gestation and lactation, contracepted females will attain improved body condition over pregnant females that require additional food resources to produce and rear an offspring. However, for free-ranging large ungulates, empirical evidence supporting [72] or refuting [73±75] this prediction is limited and equivocal. In this investigation, contracepted mares that experienced no gestation and lactation did not exhibit improved body condition over mares that successfully reproduced. Individual mares in each experimental group, attained an average BCS of 5.0 (moderate) or better, which has been reported to be the minimally optimal level of stored fat necessary to achieve maximum reproductive efficiency during pregnancy and lactation [53, 76]. These levels of body condition were reflected in the high proportion of pregnant mares (0.85 ± 0.92) observed in each treatment group at the management roundups in 2009 and 2013.

We acknowledge that our sampling intensity and/or sensitivity of our ocular index to body condition may not have enabled us to detect fine-scale differences between experimental groups. However, we conducted these evaluations during time periods when differences in body condition between pregnant and non-pregnant (GonaCon-treated) females should have been the greatest. Namely, during early spring (March) when fat deposits are depleted over winter and during April±August when the energetic demands of late gestation and lactation are increasing.

The body condition of an animal is dependent on a balance between energy intake and expenditure. When intake is not sufficient to meet energy requirements for various activities (i.e. maintenance, growth, activity, gestation, lactation, etc.), fat reserves and eventually lean body tissue will be lost. The fact that pregnant and lactating mares in this study were in similar body condition to that of contracepted ones suggest that food is unlikely a limiting factor for free-ranging horses at THRO. This is primarily due to the conservative management of multiple species of ungulates and their food resources [77±79]. The consequence of this approach is that only under the most extreme climatic conditions, such as prolonged drought, will forage be limiting to herbivores at THRO, regardless of reproductive status.

The only detectable adverse side effect of vaccination was intramuscular swelling at the vaccination site. Mares treated with GonaCon-Equine consistently showed evidence of inflammatory reactions at the injection site. While we never observed lameness associated with this reaction, several mares revealed draining abscesses within one-year post-vaccination. This is consistent with results for other wild ungulates treated with the same or similar GonaCon vaccines [13, 15, 34]. Given the designed highly inflammatory nature of both the adjuvant, which contains killed mycobacteria and non-biodegradable oil, as well as, the foreign protein carrier molecule, these types of reactions are predictable. In fact, they are likely necessary for optimum vaccine efficacy [80]. It is impossible to assess the total impact of these lesions on animal welfare; however, in this investigation, these did not have a measurable effect on body condition, locomotion, or social behaviors. Therefore, until additional research suggests otherwise, we conclude that the presence of injection site lesions following GonCon vaccination do not pose a serious contraindication associated with the application of this vaccine, and there appear to be minimal long-term effects on individual animal welfare.

Conclusions

Controlling abundance of wildlife species that are simultaneously protected, abundant, competitive for resources, and in conflict with some stakeholders is a formidable challenge for resource managers. We demonstrated that the GnRH vaccine, GonaCon-Equine, could be an effective immunocontraceptive for free-ranging feral horses, particularly when the primary vaccination is followed by reimmunization four years later. This vaccine was shown to be safe for pregnant females and neonates and did not result in deleterious behavioral side effects during the foaling/breeding season. The only adverse reactions to vaccination were non-debilitating inflammatory responses at injection sites. One noteworthy implication has emerged regarding long-term management of free-ranging horse populations using GonaCon-Equine vaccine: effective management and development of population models will need to incorporate repeat immunizations of this vaccine to optimize management strategies aimed at stabilizing the growth rate of feral horse populations. Our research suggests that practical application of this vaccine in feral horses will require an initial inoculation that may provide only modest suppression of fertility followed by reimmunization over time that together could result in greater reduction in population growth rates. Future research will begin to define the most effective revaccination schedule with GonaCon-Equine for suppressing reproductive rates in

free-ranging horses, the duration of effectiveness, and the return to fertility following treatment. Moreover, applying GonaCon-Equine to control the growth of feral horse populations will require that resource managers choose specific tactics for treating animals. Choices must be made on the number and age to treat and the frequency of treatment needed to maintain the desired population age structure and genetic diversity. Decisions on the most beneficial tactics will depend on overarching management goals and long-term objectives for the population.

Supporting information

S1 Table. Comparative metrics and pregnancy proportions, by age class, for treatment and control groups of free-ranging mares selected for this experiment.

(PDF)

S1 Photo. An Intramuscular swelling (raised area of tissue) observed in a Theodore Roosevelt National Park horse, 9 months after hand-injection with GonaCon-Equine vaccine.

(TIF)

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Dear Forest Supervisor,

The following alternatives must be analyzed and designated as proposed actions in the Environmental Assessment (EA) on the Heber Wild Horse Territory Plan.

1. Establish a genetically sustainable population limit of at least 200 horses.

The proposed AML of just 50-104 wild horses is not based on science, is too small to be genetically viable and could result in the permanent removal of 300 or more wild horses from the Territory. The AML is based on the inequitable allocation of public forage resources to privately owned livestock. The EA must analyze and designate an alternative to expand the AML to a minimum of 200 horses and provide a scientific rationale for the number, including full disclosure of the resource allocation between livestock and wild horses on which the AML is based.

2. Use humane fertility control to stabilize the Heber wild horse population and reduce it humanely over time.

The National Academy of Sciences (2013) recommended the use of humane PZP fertility control for population management of wild horse herds. The use of the PZP vaccine can bring about zero population growth within 2 years and can reduce population numbers over time. The EA must include an alternative for an aggressive PZP fertility control program in the Territory and must allow for 5-10 years to achieve an AML of 200 horses.

3. Reject use of surgical sterilization as a management tool.

The National Academy of Sciences (2013) advised that inhumane surgeries to remove the ovaries of mares are "inadvisable for field application" in wild horses due to risk bleeding and infection. The BLM must drop this alternative from consideration. In addition, the BLM has no proven studies or data to show that the use of castration as a management tool helps to actually stabilize wild horse populations. The NAS also advised that castration of stallions will cause loss of testosterone and consequent reduction in or complete loss of male-type behaviors necessary for maintenance of social organization, band integrity, and expression of natural behavior repertoire." As a result, the USFS should drop surgical sterilization from consideration as an alternative for consideration as a population management tool.

4. Boundaries of the Territory should be redrawn to accurately reflect the horses' habitat.

The current boundaries of the Territory do not accurately reflect the habitat area for these federally-protected horses, resulting in many horses being designated as "outside the Territory." This is the result of an administrative error in the drawing of the Territory boundary, and can be corrected through an administrative process concurrent with development of a new territory plan.

5. Protocols must be put in place for housing, care, placement and tracking of all horses removed from the Territory.

The USFS must fully disclose and analyze its plans for any horses removed from the Territory, including where they will be housed, how they will be cared for, and what the Forest Service plans for their long-term placement and care. By law, the USFS may not destroy healthy horses or sell them for slaughter. The USFS must create a system for placing and tracking all horses removed from the Territory. This should include, but not be limited to, the implementation of a year-long adoption process, similar to that of the BLM, by which the adopter does not gain title to the horse until one year of ownership and care. The USFS must also develop a database for tracking the disposition of each horse as well as a system for checking potential adopters or purchasers for their history regarding horse adoptions, sales and past animal abuse. Processes like these will help ensure that the USFS is complying with Congress' directive to protect federally-protected wild horses and burros from slaughter.

Our public lands and the wild horses that live on them belong to all Americans, and they must be managed in the interest of all Americans. Wild horse management must be humane, cost-effective, and based on science. The proposed management action for the Heber Wild Horse Territory must be drafted in accordance with these criteria.

Thank you for your consideration.

Contact Name	City	State	Zipcode
Becker, Carol	Sherman Oaks	CA	91423
Cabrales, Elisa	Houston	TX	77070
Vairo, Sylvia	Santa Cruz	CA	95062
Heyman, Errin	Castle Rock	CO	80104
Wilkinson, L. L.	Taos	NM	87571
Spencer, Deborah	Billerica	MA	1821
Bryan, Melissa	Roscoe	IL	61073
Barnett, Melinda	Lawrence	KS	66047
Wiser-Krizek, Katie	Mesa	AZ	85207

Stanke, Sharon	Watertown	WI	53098
Speros, George	Mount Vernon	NY	10550
Tarullo, Mary	Chicago	IL	60631
Langelan, M.	Chevy Chase	MD	20815
Miller, Crickett	Augusta	MO	63332
Miller, Tanja	Makawao	HI	96768
Vinson, Mary	Lafayette	LA	70508
Ratelle, Cathy	Fayetteville	GA	30215
Sims, Delrene	Carlsbad	CA	92009
Br., M	Albuquerque	NM	87103
MacLennan MD, Melanie	New York	NY	10009
Rogers, Pamela	San Bernardino	CA	92404
Alexander, Aimee	Reston	VA	20191
Heatherly, Debra	Hawthorn Woods	IL	60047
Karzen, Eileen	Los Angeles	CA	90064
Gehrman, Matthew	Gilbert	AZ	85296
Newton, Kiley	Louisville	KY	40204
Modjeski, Jan	Murrells Inlet	SC	29576
Evans, Elise	Bradenton	FL	34202
Byrd, Phyllis	Prather	CA	93651
Rogers, Pamela	San Bernardino	CA	92404
Cross, Debra	Eden Prairie	MN	55347
Kelly, Michelle	Seattle	WA	98107
Bossen, Allyson	Canyon Country	CA	91387
Wisch, Anita	Valencia	CA	91355
McClintock, Judy	Lake Havasu City	AZ	86404
Canning, Christine	North Attleboro	MA	2760
Lang, Katarina	Phoenix	AZ	85016
Bolle, Christine	Monrovia	CA	91017
Kring, Juli	Houston	TX	77099
Sangster, Roberta	Sandston	VA	23150
Prokop, William	East Aurora	NY	14052
Nicholson, Christina	San Francisco	CA	94122
Hawkins, Savannah	Chicago	IL	60614
McNamara, Karla C	Baden	PA	15005
Williams, Sandra	Las Vegas	NV	89131
Clark, Lorry	Sandy Springs	GA	30328
Lynch, Maureen	Clifton Springs	NY	14432
Wissid, Bitta	Minneapolis	MN	55418
Cook, Necole	Salem	VA	24153

Diegel, Kerstin	Mission Viejo	CA	92690
Chambers, Connie	Eagle	ID	83616
Montgomery, Carol	Mesa	AZ	85207
Br., M	Albuquerque	NM	87103
Hughett, Dan	Sugarloaf	CA	92386
Butler, William And Nancy	Evergreen	CO	80437
Reardon, John	Norton	MA	2766
Rydeen, Bonnie	Woodbury	MN	55125
Porter, Dianne	Liberty	NC	27298
Murphy, Cindy	Pensacola	FL	32503
Groeneweg, Nora	Lakewood	CO	80228
Gunn, Stephanie	Ramona	CA	92065
Martenson, Julie	Lakeway	TX	78734
Maher, Mary	Milpitas	CA	95035
Logan, T	Marble Falls	TX	78654
Evans, Debbie	Kearney	MO	64060
Hodges, Suzanne	Rancho Cordova	CA	95670
Aylor, Anne	Las Cruces	NM	88011
Espuga, Richard	Roselle Park	NJ	7204
Berg, Sheryl	Idaho Falls	ID	83401
Morency, Jeanne	The Plains	VA	20198
Cabalka, Carol	Scottsdale	AZ	85262
Murillo, Melissa	Bellflower	CA	90706
Dennis, Wendy	Queen Creek	AZ	85142
Hromoko, Mishel	Portland	OR	97217
Brown, Margaret	Foristell	MO	63348
Marion, Carolyn	Neptune	NJ	7753
Gunn, Stephanie	Ramona	CA	92065
Arie, Lisa	Dove Creek	CO	81324
Cunningham, Susan	New York	NY	10016
Ingram, Carole	South Fulton	TN	38257
Butler, Edward	New York	NY	10021
Ozzello, Paula	Trinidad	CO	81082
Glaser, Paula	Pico Rivera	CA	90660
Starner, Lynn	Vacaville	CA	95688
Landis, Maggie	New York	NY	10009
Watson, Bonnie	Baldwinsville	NY	13027
Looney, Lois	Houston	TX	77062
Dawson, Barbara	Columbia	MO	65201
Jakusz, Darlene	Amherst Jct	WI	54407

Purcell, Deedee	Phoenix	AZ	85016
Stehle, Alice	Butler	PA	16001
Levin, CathyeElizabeth	Bayonne	NJ	7002
Newton, Kiley	Louisville	KY	40204
Rawlings, Tim	Livingston	TX	77399
Dillon, Howard	Bolinas	CA	94924
Sugarman, Stevie	Malibu	CA	90265
Hodges, Sherrri	Phoenix	AZ	85051
Briggs, Barbro	Tucson	AZ	85741
Torre, Lupe	St Petersburg	FL	33701
Adams, Carolyn	Atherton	CA	94027
Vessicchio, Susan P.	New Haven	CT	6512
Gregori, Sascha	Edwards	CO	81632
Arotsky, Nancy	Prospect	CT	6712
Gorlin, Rachel	Washington	DC	20011
Rego, Lydia	Ferrum	VA	24088
Ducay, Terri	Menlo Park	CA	94025
Rose, Donna	Middletown	NY	10941
Leonardy, Barbara	Jacksonville	FL	32207
Stein, Julie	Arleta	CA	91331
Loe, Peggy	Seaside	CA	93955
Lilly, Marilyn	Joshua	TX	76058
Robinson, Wesley	Phoenix	AZ	85016
White, Lois	Grants Pass	OR	97527
Fritzler, Deb	Amherst	VA	24521
McCoy, Timothy	Bayport	NY	11705
Anders, Peggy	Weaverville	NC	28787
Wanninger, Steve	Rockford	IL	61103
Jackson, Sasha	Detroit	MI	48228
M, Anne	Frisco	TX	75035
Leonardy, Jan	Jacksonville	FL	32207
Walker, Toni	Latimer	IA	50452
White, Pj	Mission Viejo	CA	92691
A., Marty	Reno	NV	89506
Ferrusi, Danielle	Vancouver	WA	98682
Shore, Lisa	Clear Creek	IN	47426
Steele, Bill	Phoenix	AZ	85016
Torgersen, Beth	Apache Junction	AZ	85119
Roe, John	Leander	TX	78646
Russo, Robin	Louisville	KY	40206

Stewart, Jackie	Tuscaloosa	AL	35405
Ketcherside, Sharon	Lincoln	CA	95648
Keech, Lorena	Lenexa	KS	66219
Debono, Mary	Poway	CA	92064
Minick, Audrey	Milan	MI	48160
Sadow, Catherine	Fountain Hills	AZ	85268
Lyons, Kathi	San Antonio	TX	78257
Cooperrider, Carol	Albuquerque	NM	87105
Graham, Anne	Rochester	NY	14625
Uhlik, Linda	Florence	AZ	85132
Purcell, Holly	Phoenix	AZ	85016
Parrish, Bonny	Sadieville	KY	40370
Colony, M	Crestone	CO	81131
Gibbs, Joseph	Peoria	AZ	85345
Guidarelli, Alicia	South Yarmouth	MA	2664
Phillips, Erin	Springfield	GA	31329
Truneckova, Jirina	Portland	OR	97205
Wuethrich, Linda	Young Harris	GA	30582
Moeller, Maureen	Milwaukee	WI	53221
Angeletti, Lois	Ashland	VA	23005
Black, Carol	Valparaiso	IN	46383
Williamson, Dee	Midland	TX	79705
Genevich, Genny	El Prado	NM	87529
Wood, Barbara	Grand Prairie	TX	75052
Cohen, Harriet	New York	NY	10016
LePow, Cody	Ojai	CA	93023
Rojeski, Mary	Santa Monica	CA	90405
Louck, Marion	Inver Grove Heights	MN	55077
Patterson, Shay	Palmyra	PA	17078
Taylor, Chris	Beverly Hills	CA	90210
Bianco, Marijo	Pacific	MO	63069
Bippert-Plymate, Teresa	Big Bear City	CA	92314
Maxwell, Heather	Springfield	VA	22152
Silvey, Kevin	Seminole	FL	33777
Wilson, Tamar Diana	La Mesa	CA	91941
Wood, Becky	Toledo	OH	43609
McCoy, Suzanne	Bayport	NY	11705
Long, Lisa	Uhrichsville	OH	44683
Oliver, Kathy	Houston	TX	77024
Doshi, Tejas	Berkeley	CA	94704

Franco, Mary	Kearny	NJ	7032
McClellan, Marsha	Oak Park	IL	60302
Lauderdale, Kama	Seaside	CA	93955
Aragon, Maria	Alamogordo	NM	88310
Knoll, Kris	North Las Vegas	NV	89032
Garneau, Kristen	Sonoma	CA	95476
Claggett, Suzanne	Pensacola	FL	32504
Thomas, Pamela	Lutz	FL	33548
Constant, Linda	Rolling Hills	CA	90274
Becker, Nancy	Bend	OR	97702
Saglietto, Eve	Newcastle	UT	84756
Diaz, Robin	Long Beach	CA	90815
Hefinger Hernandez, Helena	Atascadero	CA	93422
Jones, Karen	Venice	CA	90291
Richards, Deborah	Burns	WY	82053
Dance, Marsha	Berry	KY	41003
Wilson, Tina	Pahrump	NV	89048
Aguirre, Elizabeth	Doral	FL	33172
Reid, Kathryn	Atascadero	CA	93422
Gast, Marilyn	Paducah	KY	42001
Gove, Joan	Pompano Beach	FL	33062
Pierce, Lynda	Tucson	AZ	85739
Mills, Kat	Port Angeles	WA	98362
Badham, Linda	Bishops Stortford	GA	30375
Lyles-Diers, Kathy	Wichita	KS	67207
Christian, Brian	Rio Rancho	NM	87124
La Shay, Jeri	Bedford Hills	NY	10507
Minamide, Jenice	Douglas	AZ	85607
Guisinger, Tim	Camarillo	CA	93010
Daragan, Bette	Flower Mound	TX	75028
Engleman, Jim	Laramie	WY	82072
Hinshaw, Ann	Dallas	TX	75218
DeFilippo, Dagmara	Lyndhurst	NJ	7071
Tesh, Wayne	Chapel Hill	NC	27514
Kreuter, Kathy	Ft Worth	TX	76112
Dillon, Christi	Mooreville	NC	28117
Smith, Connie	Hurricane	UT	84737
Gonder, Gloria	Show Low	AZ	85901
Lamb, Joyce	Brooklyn	NY	11209
Choate, Tina	Sedona	AZ	86336

Lipman, Tracy	Rego Park	NY	11374
Conner, Susan	Gainesville	FL	32607
Capstick, Hilary	Tallahassee	FL	32303
Lambert, Susan	Foster	RI	2825
Koesters, Andrea	Phoenix	AZ	85009
Ramseyer, Judith	Green Valley	AZ	85614
Koker, Kim	Las Vegas	NV	89117
Dowling, Deborah	Gresham	OR	97030
Kestler, Ronald	Louisville	KY	40223
Huyett, Rick	Los Gatos	CA	95033
Wilkinson, Angela	San Antonio	TX	78239
Dickinson, William	Columbia	MO	65203
Dimesky, Annette	Austin	TX	78723
Lewis, Diana	Summit	WI	53066
Stringer, Geri	Richland	WA	99352
Saffran, Patty	New York	NY	10065
McEachrontaylor, Lindalee	Tucson	AZ	85746
Holihan, Nancy	Morristown	AZ	85342
Covey, Tim	Ventura	CA	93003
Holman, Michelle	Taylorsville	UT	84129
Mazzola, Lisa	Tampa	FL	33612
Godfrey, Cheryl	Salt Lake City	UT	84121
Wolph, Pat	Silver City	NM	88061
Voves, Deborah	Anchorage	AK	99516
Ross, Katherine	Valparaiso	IN	46385
Patterson, Pam	Miami	FL	33165
Bernbaum, Pamela	Memphis	TN	38125
Schelich, Missy	Washington	MO	63090
Du Mont, Lyn	Golden	CO	80401
Oconnor, Aimi	Sterling	VA	20164
Nardone, Don	South Glens Falls	NY	12803
Riley, Kristina	Coon Rapids	MN	55448
Baughman, Nancy	Mora	NM	87732
Deeb, Zeena	Reston	VA	20194
Wright, Tree	Los Angeles	CA	90039
Twyman, Janet	Cottonwood	AZ	86326
Brashears, Karen	Chicago	IL	60654
Hill, Karen	Albuquerque	NM	87109
Field, Pat	Sag Harbor	NY	11963
Metcalf, Martha	Grants Pass	OR	97527

Rogers, Ken	Spirit Lake	ID	83869
Dozier, Fran	Philadelphia	PA	19137
Ross, Beth	Beverly	MA	1915
Thomas, Tucker	Ewing	NJ	8628
Cole, D	Plainview	IL	62685
Gx, Perry	Tustin	CA	92780
Dyer, Darlene	Sun City	AZ	85351
Bergstrom, Joy	Wake Forest	NC	27587
Goodyear, Maxine	Independence	IA	50644
Keogh, Faye	Berkeley	CA	94705
Dock, Julie	Cincinnati	OH	45238
Holihan, Steve	Morristown	AZ	85342
Krause, Doug	Pompano Beach	FL	33071
Castillo, Terry	Lemon Grove	CA	91945
Bustos, Corinne	Pittsburg	CA	94565
Laughlin, Mary	Plantation	FL	33322
Buchanan, Jean	Tampa	FL	33619
Stoops, Mary	Thompsonville	MI	49683
Cuttler, Elaine	Millburn	NJ	7041
Phillips, Annie	San Diego	CA	92101
Young, Cindy	Princeton	IL	61356
Damm, Barbara	Neptune	NJ	7753
Poulsen, Emily	Fresno	CA	93720
Motta, John	Glendale	AZ	85308
Rossow, Mark	Huachuca City	AZ	85616
Withington, Gene	San Jose	CA	95129
Baxter Jr., Ralph	Fort Wayne	IN	46835
Oday, Barbara	Elkhart	IN	46517
Walker, Donna	Deering	NH	3244
Swanson, J	Kildeer	IL	60047
Santerre, Gay And David	Buckley	WA	98321
Schwartz, Kelly	Arlington	VA	22207
Cohn, Ken	Dayton	OH	45415
Buller, Cindy	Grand Junction	CO	81506
Pike, Sally	Ladys Island	SC	29907
Lechner, Debbie	Altoona	PA	16601
Roselli, Mary	Hornell	NY	14843
Owens, Dj	Greenbelt	MD	20770
Towle, Dawn	Doylestown	PA	18901
Gress, Laurel	Wadsworth	OH	44281

Kerns, Michael-David	Harpers Ferry	WV	25425
Schoo, Steve	Saint Peters	MO	63376
Perkins, Nancy L	South Padre Island	TX	78597
White, Pamela	Los Angeles	CA	90035
Beierl, Barbara	Nashua	NH	3062
McRay, Linda	Old Hickory	TN	37138
Robinson, Teresa	Suffolk	VA	23436
Kamo, Kathryn	Columbia	MD	21045
Burton, Myrna	North Las Vegas	NV	89030
McCarthy, Anne	Bishop	CA	93514
Cunningham, Debbie	Tempe	AZ	85284
Frank, Robert	Bossier City	LA	71111
Stiff, Kristin	Richmond	VA	23221
Kriss, Evan Jane	Sausalito	CA	94965
Peterson, Darlene	Warren	PA	16365
Marshall, Stephen	Turnersville	NJ	8012
Tobias, Kate	Scottsdale	AZ	85250
Baker, Judy	Battle Creek	MI	49014
Johnson, Katherine	Santa Barbara	CA	93110
Merljak, Julija	Fairplay	CO	80440
Smith, Dawn	Spring Grove	IL	60081
Jensen, Sherry	Port Charlotte	FL	33952
Christie, Caroline	Colrain	MA	1340
Moss, Allissa	Scottsdale	AZ	85255
Kirpalani, Pam	Poway	CA	92064
Sickles, David	Willoughby	OH	44094
Tyler, Theresa	Brookings	OR	97415
B., Veronica	Placerville	CA	95667
Mandler, Charlotte	Allamuchy	NJ	7820
Knight, Nina	Santa Fe	TX	77510
Garcia, Leticia	Scottsdale	AZ	85251
Lilly, Haley	Aurora	CO	80012
Goynes, Beverlee	Ridgefield	CT	6877
Swank, Carrie	Sinking Spring	PA	19608
Breckner, Jill	Scottsdale	AZ	85255
Pinto, Debra	Holly Springs	NC	27540
Wald, Aloysius	Columbus	OH	43214
Helmer, Laurice	Monroe	CT	6468
Boyce, Steven	Prescott	AZ	86305
Vandieren, Holland	Pasadena	CA	91105

Hill, Sherrie	Saint Louis	MO	63128
Landers, Les	Fernley	NV	89408
Fowler, Geraldine	Silver Springs	FL	34488
Burton, Myrna	North Las Vegas	NV	89030
Angelo, Marjorie	Bunnell	FL	32110
Gandolfo, Deborah	Kirkland	WA	98033
Clark, Mary	Stella	NC	28582
MacMillan, Lawrie	Modesto	CA	95355
Overman, Gwen	Beecher	IL	60401
Fernandes, Yvonne	Santa Monica	CA	90402
Malyon, Ann	Oakland	NJ	7436
Oliver, Marjorie	Mesa	AZ	85206
Wyatt, Mia	Ellicott City	MD	21043
Oppenheim, Jennifer	Alba	TX	75410
Brown, Victoria	Edmond	OK	73012
Watts, Elizabeth	Boynton Beach	FL	33435
Krieger, Jessie	Mayville	WI	53050
Cline, Terry	Garland	TX	75040
Wechsler, Lynn	Bishop	CA	93514
Rodriguez, Elizabeth	Littleton	CO	80127
Moylan, Julie	Troy	MI	48098
Bouchoux, Mary	Bloomfield	NJ	7003
Martin, Ken	Newtown	CT	6470
Allen, Renate	Mesa	AZ	85205
Wolfe, Kelley	Oro Valley	AZ	85755
Nelson, Eric And Kay	Vacaville	CA	95688
McGovern, Annette	Fountain Hills	AZ	85268
Bloch, Cheryl	Acton	CA	93510
Shirley, Robin	Culloden	WV	25510
Cramp, Liz	Clifton	VA	20124
Eggan, Keelyn	Lakemoor	IL	60051
Salsbury, Kathleen	Syracuse	NY	13219
Brown, Ron	Scottsdale	AZ	85259
Butters, Arlene	Arlington	MA	2476
Livengood, Christine	Hereford	AZ	85615
Weldon, Rena	Eustis	FL	32736
Dutcher, Carole	Prescott	AZ	86305
Conrad, Barbara	Lake Elmo	MN	55042
Waller, Emory	Miami	FL	33169
Nunez, Julio	Maitland	FL	32751

Knoll, Carolyn	Orinda	CA	94563
Rues, Alicia	Topeka	KS	66604
Riemer, Kathy	Cave Creek	AZ	85331
Eudy, Elaine	East Point	GA	30344
Mills, Nicholas	Abingdon	VA	24210
Janicki, Joyce	Saint Clair Shores	MI	48081
Settle, Greg	Bend	OR	97703
Foley, Susan	Westfield	MA	1085
Tietz, Tom	Prescott Valley	AZ	86315
Francis, Joann	Tallmadge	OH	44278
Ramos, Ronda	Canby	OR	97013
Roberson, Sarabeth	Oro Valley	AZ	85737
Wisch, Anita	Valencia	CA	91355
Sgroi, Jacqueline	Glendale	AZ	85308
Schenck, Charles III	Morrisonville	NY	12962
Mize, Robert	Inyokern	CA	93527
Robson, Elaine	Topsfield	MA	1983
Schmidt, Virginia	Mills River	NC	28759
Lukowitz, Wendy	Allenhurst	NJ	7711
Rigatti, Karen	Binghamton	NY	13905
Crawford, Carolyn	Villisca	IA	50864
Greaves, Linda	Springfield	VA	22150
Desmond, Alice	Abingdon	VA	24210
Rosati, Doyla	Winfield	AL	35594
Bednar, Brenda	Stafford Springs	CT	6076
Broussard, Rachel	Ocean Springs	MS	39564
Barber, Marcia	Boulder	CO	80302
Evanson, Marika	Sedona	AZ	86336
Haines, Lisa	Patterson	NY	12563
Sturges, Chris	Englewood	FL	34224
Rudisill, Amanda Sue	Olympia	WA	98508
Thomas, Theresa	Richmond	VA	23230
Bork, Annette	Irvine	CA	92612
Mabry, Kate	Vicksburg	MS	39180
Sutton, Russ	Prescott Valley	AZ	86314
Watkins, Karl	Norristown	PA	19403
Riggs, Mary	Muncie	IN	47302
Gurney, Hugh	Howell	MI	48855
Dietzmann, Cynthia	Wilson	WY	83014
Goodwin, Mattie	Shreveport	LA	71105

Smith, Chris	Waxahachie	TX	75165
Smith, Melissa	Tehachapi	CA	93561
Goodwin, Mattie	Shreveport	LA	71105
Wright, Megs	San Clemente	CA	92672
Walton-Para, Christie	Stockton	CA	95213
Fontana, Glenda	Burlingame	CA	94011
Quail, Kevin	Placitas	NM	87043
Modisher, Susi	Black Hawk	CO	80422
Woods, Barbara	Overgaard	AZ	85933
Perel, Suzanne	Avon	MA	2322
A, L	Virginia Beach	VA	23451
Fontaine, Anna Louise	Lantier, Qc,	FL	11111
Repp, S.	Sun City Center	FL	33573
Hennessy, Maura	Alameda	CA	94501
Stanley, Sharon	Mesa	AZ	85202
SÈvilla, Caroline	Schenectady	NY	12345
Wood, Peter	Cornwall	NY	12518
Hayward, Michelle Hayward	Brooklyn	NY	11201
Cover, Terry	Conyers	GA	30013
Campbell, Dawna	Thornton	TX	76687
Dahm, Robert	Jamestown	TN	38556
Williams, Cecelia	Dallas	TX	75229
Riddell, Catherine	Pagosa Springs	CO	81147
Boyle, Mary	Cameron Park	CA	95682
Muller, Bambi	Cave Creek	AZ	85327
Mulato, Jill	Dana Point	CA	92629
Stafford, Janet	Dover	FL	33527
McFall, Norma	Dewey	AZ	86327
Shively, Judy	San Diego	CA	92101
Jacobs, Leigh	Tucson	AZ	85730
Vergilia, Nadine	Austin	TX	78750
Holm, Julie	Shelton	WA	98584
Gillin, Kathi	Yardley	PA	19067
Carpenter, Christy	Smithsburg	MD	21783
Jordan, S.	Deerfield Bch	FL	33441
Ellis, Carol	Hammond	WI	54015
Collins, Deborah	Bullhead City	AZ	86442
Nussear, Steve	Allamuchy	NJ	7820
Hunt, Rebecca	Salt Lake City	UT	84121
Greendeer, Taryn	Viroqua	WI	54665

Gaulin, Gigi	Attapulcus	GA	39815
Oswald, Sarah	Melbourne	FL	32935
Gage, Carol	Newcastle	CA	95658
Alonzo, Anne	Richardson	TX	75080
Coryell, Leone	Bellvue	CO	80512
Dumser, N	Northport	NY	11768
James, Gordon	Charlotte	NC	28211
Shannon Marsh, Frances	Santa Barbara	CA	93108
Kelley, Dorinda	Portland	OR	97213
Deery, Theresa	Bluffton	SC	29909
Light, Andrew	Webbers Falls	OK	74470
MacKenzie, Michelle	Menlo Park	CA	94025
Fraser, Susan	Carrollton	TX	75010
Applebaum, Doris	Oak Park	MI	48237
Hemmings, Jane	Springfield	MA	1105
Rizzi, Tricia	Massapequa	NY	11758
Bush, Christina	Tooele	UT	84074
Gutersohn, Irmgard	El Paso	TX	79924
Cyrill, Janice	Campobello	SC	29322
Fuller, Don	Peru	ME	4290
Boros, Barbara	Santa Barbara	CA	93105
Stolle, Mike	Fruita	CO	81521
Powell, Peggy	Cotulla	TX	78014
Shaw, Linnea	Charlotte	MI	48813
Wyman, Lynn	Napa	CA	94558
Lenhart, Donna	Poughkeepsie	NY	12603
Parkinson, Brian	Commerce City	CO	80022
Prebles, Cheryl	Harmony	PA	16037
Leykis, Lourdes	Tucson	AZ	85721
Hicks, Melinda	Dacula	GA	30019
Manetto, Corinna	New York	NY	10011
Lewis, Erma	Brooklyn	NY	11204
Starr, Sheryl	Albuquerque	NM	87110
Lowrie, Sarah	Ingleside	TX	78362
Brooks, Theresa	Kent	NY	14477
Elder, Laura	Litchfield Park	AZ	85340
Light, Carole E	Webbers Falls	OK	74470
Dittman, Mary Baker	Pinehurst	TX	77362
Hutchison, Stanley	Rio Vista	TX	76093
Zaman-Zade, Rena	Escondido	CA	92027

Balduff, Marilyn	Granada Hills	CA	91344
Sanecki, Janice	Royal Oak	MI	48073
Peters, Nancy	Harwood Heights	IL	60706
Neumeier, Karen	Cameron Park	CA	95682
Sherrard, Patricia	Westerville	OH	43082
Sweeney, Pam	Brandon	MS	39047
Lewis, Erma	Brooklyn	NY	11204
Sinclair, L.	Portland	OR	97229
Miller, Vicky	Edmonds	WA	98026
Austin-Puccio, Patricia	Norwalk	CT	6853
Perkins, Pamela	Newark	DE	19713
Rohden, Debra	Phoenix	AZ	85027
Elliott, Angelina Elliott	Oceanside	CA	92056
Stark, Toni	Stevensville	MT	59870
Hankey, Mary	Cullman	AL	35058
Hoke, Carol	Conover	NC	28613
Brown, Harold	Phoenix	AZ	85027
Vermaas, Ria	Oud-Beijerland	ND	32620
Jennings, Linda	Saint Joseph	MO	64506
Cox, Joseph S.	Reno	NV	89523
Scollin, Mary	Saranac Lake	NY	12983
Jarvis, Marsha	Pinole	CA	94564
H, Karin	Earlville	PA	19519
Spitz, Danielle	Kamuela	HI	96743
Nordbusch, Martha	Prineville	OR	97754
Scott, Barbara	Las Vegas	NV	89102
Wagoner, Donna	Woodleaf	NC	27054
Ambacher, Marytherese	Antioch	IL	60002
Vandiver, Diane	Bolingbrook	IL	60440
Gonzalez, Katherine	Albuquerque	NM	87110
Beverly, J.	Urbana	IL	61801
Maiocchi, Wilma	Waltham	MA	2453
Tschudin, Erika	Rescue	CA	95672
Jacobs, Kathy	Fort Collins	CO	80525
Jolley, Stefani	Phoenix	AZ	85043
Story, Sue	Dolores	CO	81323
Buys, Diane	Charlotte	NC	28212
Middour, Sandra	Round Hill	VA	20141
Koesters, Gracie	Lanesville	IN	47136
Winnick, Joie	Sherman Oaks	CA	91423

Trowbridge, Michele	Sandy	UT	84070
Semple, Toni	Livingston	MT	59047
Adams, Mikanuk Larry D.	Redlake	MN	56671
McLaughlin, Patrick	Verdi	NV	89439
Rocha, Candace	Los Angeles	CA	90032
Reynolds, Patricia	Washougal	WA	98671
Broadbeck, Virginia	Orange	VA	22960
Coleman Taylor, Peggy	Gilbert	AZ	85296
Skalic, Dita	Palm Desert	CA	92260
Saja, Jean	Raymond	MS	39154
Bailey, Charles	Wilson	NC	27893
Hunter, Lynne	San Diego	CA	92116
Viola, Krystle	Hazlet	NJ	7730
Bonatti, Karen	Braintree	MA	2184
Johnson, Constance	Plantation	FL	33324
Bodiford, Loretta	Soulsbyville	CA	95372
Ballard, Julia	Broomfield	CO	80021
Neeble, Tina	Lyman	SC	29365
Ivey, Jennifer	Raleigh	NC	27604
Haley, Janice	Davenport	FL	33896
Kastner, Ruth	Gloversville	NY	12078
Holley, Lynne	Lake Forest	CA	92630
Confectioner, Vira	Sunol	CA	94586
Peckham, Lj	Wakefield	MA	1880
Cross, Russ	Ladoga	IN	47954
Wadler, Vicki	Livermore	CA	94551
Harriman, Frances	Cumberland	RI	2864
Noriega, Teri	Rancho Cucamonga	CA	91730
Ziesmann, Erika	Covina	CA	91724
Lease, Karin	Graton	CA	95444
Spurgin Hussey, Emma	Burdett	NY	14818
Todd, Linda	Austin	TX	78751
Roberts, Elizabeth	Chicago	IL	60655
Shelton, Justine	Pahoa	HI	96778
Rabinowitz, Rebecca	Moorestown	NJ	8057
Dias, Alicia	Abingdon	VA	24210
Collins, Colleen	Moreno Valley	CA	92555
Thompson, Sandy	Bend	OR	97703
Almskaar, S. P.	Everson	WA	98247
Francis, Debra	Willard	OH	44890

Weldon, Wendy	Delray Beach	FL	33484
Bescript, Linda	Langhorne	PA	19047
Widmark, Anne	Santa Fe	NM	87501
Charrette, Pamela	Bullhead City	AZ	86429
Snell, Heidi	Belen	NM	87002
Wallace, Marcia	Georgetown	KY	40324
Donlon, Sandra	Flagstaff	AZ	86004
Pope, Vick	Powder Springs	GA	30127
Williams, John	Manlius	NY	13104
Shearstone, Beverly	Franklin	NJ	7416
Powell, Shelley	Marion Station	MD	21838
Albany, Elena	Mesa	AZ	85215
Kozinski, Susan	St Francis	WI	53235
Abel, Teresa	Clarkston	WA	99403
Meyer, Katie	Chino Valley	AZ	86323
Siekierda, Lori	Manitou Beach	MI	49253
Prystupa, Nanette	Carteret	NJ	7008
Poissant, Barbara	Fort Lee	NJ	7024
Miller, Robyn	Chandler	AZ	85226
Deddy, John	Miami	FL	33176
Rust, Gerald	Troy	IN	47588
Collar, Sharon	Lima	OH	45804
D, Shellie	Ottawa Lake	MI	49267
Hively, Deborah	Champaign	IL	61822
Weber, Helen	Sierra Vista	AZ	85650
McGeary, Mary	Brooklyn	NY	11201
Hoverson, Jane	Gilbert	AZ	85298
Nachman, ReNae	Phoenix	AZ	85041
Rodriguez, Susan	Scottsdale	AZ	85260
Rupp, Nancy	Glen Burnie	MD	21060
Laube, Melissa	Arlington	MA	2474
Green, Lydian	Trumansburg	NY	14886
Billings, Sharon	San Diego	CA	92130
Beutler, Jamie	El Dorado Hills	CA	95762
Tavares, Cindy	Portsmouth	RI	2871
Leitch, Mary Ann	Phila	PA	19147
Tizza, Steve	Mesa	AZ	85208
Miles, Kevin	Etna	CA	96027
Christiansen, Candace	Upland	CA	91786
Davis, Vicki	Lenox	MI	48048

James-Hooper, April	Patchogue	NY	11772
Taylor, Elaine	Glendale	CA	91205
Burns, Charlie	Norwalk	CT	6850
Lurtz, Jamie	Las Vegas	NV	89121
Knoop, Pat	San Jose	CA	95120
Teevan, John III	Chula Vista	CA	91914
Peru, Melissa	Fountain Hills	AZ	85268
Barnes, Lindy	Lake Ann	MI	49650
Dixon, Marie	Winchester	OR	97495
Snavely, Irene	Covina	CA	91724
Obryan, Richard	Los Angeles	CA	90066
McDonald, Jennifer	Moncks Corner	SC	29461
Faillace, Ondrea	Agoura Hills	CA	91301
Fisher, Linda	Tucson	AZ	85737
Ardisana, David	Beecher	IL	60401
Slack, Janet	Austin	TX	78731
Smith, Karen	Springfield	PA	19064
Zapp, Helen	Waxhaw	NC	28173
Jurey, Debra	Templeton	CA	93465
Putnam, Nancy	Cherry Valley	NY	13320
Moore, Linda	Yuma	AZ	85365
Nations, Linda	Pueblo	CO	81001
Furnish, Shearle	Little Rock	AR	72223
Fletcher, Paddy	Grand Junction	CO	81507
Longever, Jordan	Dorchester	MA	2122
Franco, Rita	Monrovia	CA	91016
Wolcott, James	New Albany	IN	47150
Eaton, Lucy	Nantucket	MA	2554
Castle, Linda	Geneva	IL	60134
Hunter, Jody	Signal Mountain	TN	37377
Lewis, Anna	Oklahoma City	OK	73128
D'Antonio, Mary-Ann	The Villages	FL	32163
Lum, Jeanna	Temecula	CA	92592
Kirby, Suzanne	Sag Harbor	NY	11963
Skylstad, Michelle	Omak	WA	98841
Kataoka, Lucy	Carmichael	CA	95608
Kosa, Nancy	Pompano Beach	FL	33062
Lewis, Shelly	Atlanta	GA	30318
Steininger, Lorenz	Stafford	VA	22554
Zapp, Alexander	Waxhaw	NC	28173

Lalik, Lisa	Campbellsville	KY	42718
Johnsen, Anne	Aurora	IL	60506
Austin, Lynda	Ione	CA	95640
Chambers, Tara	Concord	MA	1742
Cote, Joy	Newport	TN	37821
Joslin, Jay	Redmond	WA	98053
French, Leeann	Aurora	CO	80010
Windsor, Sarah	Hope Valley	RI	2832
Silkey, Ulrike	South Lake Tahoe	CA	96150
MacKenzie, Roland	Bowdoinham	ME	4008
Quayle, Elizabeth	Dover	MA	2030
Schwarz, Beverly	Bordentown	NJ	8505
Cohen, Irene	Clarksdale	MS	38614
Pszenny, Natalia	New York	NY	10025
Renard, Mary	Union City	NJ	7087
Lambalot, Daniel	Milpitas	CA	95035
Nelson, Jackie	Medford	OR	97504
Arbuckle, Jato	Hot Springs	AR	71913
Hyslope, Darlene	Wdm	IA	50265
Howard, Laurie	Amarillo	TX	79124
Rocheleau, Jessica	Maple Grove	MN	55369
Bergeron, Allison	Bridgton	ME	4009
Doucet, Lisha	Wellington	CO	80549
Benjamin, Elaine	Alpine	CA	91901
Goyarola, Madeline	San Mateo	CA	94403
Mick, Marilyn	Universal City	TX	78148
Garcia, Lisa	Tucson	AZ	85716
Hatfield, Carol	Indianapolis	IN	46203
Ward, Terrence	Midlothian	IL	60445
Biggs, Susannah	Columbia City	IN	46725
Beare, Lou	Bushnell	FL	33513
King, Cheryl	San Pablo	CA	94806
Cucci, Karen	Minnetonka	MN	55305
Eastin, Sarah	Arvada	CO	80002
Francis, Rebecca	White House	TN	37188
Kingren, Mary	Patchogue	NY	11772
Galloway, Craig	Santa Monica	CA	90403
Kuepper, Martha	Buckhannon	WV	26201
Kingsbury, Lynn J	North Easton	MA	2356
Flum, Sheri	Tucson	AZ	85739

Haferkamp, Kelly	Garland	TX	75040
Bonfiglio, Julia	San Mateo	CA	94402
Haller, Tj	San Antonio	TX	78253
Townsend, Cheryl	Redondo Beach	CA	90278
Stich, Tanja	Lakewood	OH	44107
Hoffmann, Sharon	Saint Louis	MO	63139
Phillis, Susie	Phoenix	AZ	85032
Soreil, B.	Virginia Beach	VA	23471
Chartier, Irene	Bristol	CT	6010
Victor, Sue	Las Vegas	NV	89147
Egan, Sharon	Reston	VA	20191
Kulkarni, Claudette	Pittsburgh	PA	15206
Cain, Lyn	Palm Bay	FL	32907
Stewart, Christine	Escondido	CA	92026
Lawrence, Marianne	Carlsbad	CA	92010
Enzone, Janice	Huntington	NY	11743
Andrews, Penelope Z	Hermon	ME	4401
Reichert, Charity	San Tan Valley	AZ	85140
Morrissey, Christine	Appleton	WI	54911
Homeister, Rosemary	Hollywood	FL	33023
Williams, Diana	Coppell	TX	75019
Cardarelli, Barbara	Redmond	WA	98052
Dunlap, Naomi	Henderson	CO	80640
Waller, Kim	Cleveland	MO	64734
Andrew, Karen	Petaluma	CA	94952
Asanin, Ana	Houston	TX	77070
Oneill, Ellen	Rochester	NY	14618
Michak, Rebecca	Beaver Falls	PA	15010
Williams Leavy, Lisa	Coconut Creek	FL	33073
Trammell, Patty	Tecumseh	OK	74873
Waters, Mr. Anje'	Grass Valley	CA	95945
Ruck, Louise	Las Vegas	NV	89119
Flores, Diane	Southfield	MI	48075
Pol, Claudine	Stevensville	MT	59870
Brunskill, Nan	Liberty Twp	OH	45011
Bird, Paul	Tucson	AZ	85743
Leu, Natalie	Tujunga	CA	91042
Lauzon, Charlene	Lynnwood	WA	98036
T, E	Canton	MI	48188
Thompson, Andrea	Terre Haute	IN	47803

Perkins, Phoebe	Phoenix	AZ	85016
Baugus, Jennifer	Merritt Island	FL	32952
Hoogerwerf, Willemijntje	Saint Augustine	FL	32080
Leggett, Irene	Great Yarmouth	NY	20371
Xanthopoulos, Susan	Dillon	MT	59725
Schuchard, Susan	Nolensville	TN	37135
Pell, Taylor	Marietta	GA	30064
Burns, JI	Osawatomie	KS	66064
Bach, Kimberly	Shingle Springs	CA	95682
Levine, Beth	Rockville	MD	20850
Cangiano, Barbara	Branford	CT	6405
Bodsberg, James	Saint Paul Park	MN	55071
Brown, Laurie	McHenry	IL	60051
Traniello, Francine	Middleboro	MA	2346
Villinger, Beverly	Bozeman	MT	59715
Napolitano, Karen	Schenectady	NY	12305
Duke, Linda	Belleville	IL	62226
Schocken, Eva	Springfield	MA	1108
Kite, Richard	New York	NY	10178
Firestone, Linda	Port Orford	OR	97465
Seewester, Frank	Fairfield	CA	94533
R, M	Raymond	NH	3077
Marrs, Cynthia	Junction City	OR	97448
Erickson, Pamela	Marina Del Rey	CA	90292
Trahan, Brenda	Fort Mohave	AZ	86426
Moegenburg, Mary	Stanley	NM	87056
Hoff, Jacquelyn	Scottsdale	AZ	85262
Simson, Esther-Grace	Weston	CT	6883
Richmond, Lonna	Muir Beach	CA	94965
Schwall, Nancy	Stafford	VA	22554
Bava, Elizabeth	Paeonian Springs	VA	20129
Ohlendorf, Richard	Lakewood Ranch	FL	34202
Livingston, Deborah	Austin	TX	78757
Sonen, Sophia	Salisbury	MD	21801
Evans, C. Michael	South Lake Tahoe	CA	96150
Ohlendorf, Carol	Lakewood Ranch	FL	34202
Rando, Tom	Jamestown	NC	27282
Callahan, Jeanette	San Antonio	TX	78240
Soares, David	Pollock Pines	CA	95726
Legato, Louisa	Wellington	FL	33414

May, Patricia	Independence	KS	67301
Meinke, Patricia	Deeth	NV	89823
Piazza, Bob	Hilton	NY	14468
Popp, Daniel	Austin	TX	78757
Daly, Dorcas	Tucson	AZ	85711
Lessig, Sheri	Fountain Hills	AZ	85268
Rittenberg, Laurie	Studio City	CA	91604
Candor, Patricia	Ladson	SC	29456
Oden, Lisa	New Ipswich	NH	3071
Middlesworth, Jane B	Hailey	ID	83333
Hodsoll, Mimi	Falls Church	VA	22043
Cormier, Bonnie	Petaluma	CA	94954
Pachas, Mary	Kill Devil Hills	NC	27948
Popp, Elsielen	Baton Rouge	LA	70817
McVannel, Debra	Phoenix	AZ	85029
Gershon, Howard	Santa Fe	NM	87506
Lawrence, Jaen	Dallas	TX	75240
Brown, Den	Portsmouth	NH	3801
Folley, Catherine	Fairview	NC	28730
Ellenberg, Jane	Millbrook	NY	12545
Woolley, April	Springer	NM	87747
Brooks, Janice	Redwood City	CA	94061
Ortiz, David	Franklin	WI	53132
Canova, Gloria	Dayton	NV	89403
Sunar, Rina	Dover	PA	17315
Baker, Kimberly	Arcata	CA	95521
Bostaph, Cristina	Volant	PA	16156
Sunar, Rina	Dover	PA	17315
Brown, Marilyn	Matthews	NC	28105
Marinakis, Marie	Newtown Square	PA	19073
Finamore, Scott	Citrus Springs	FL	34433
Esher, Shawn	Dover	PA	17315
Cooper, Melissa	Northlake	TX	76226
Inscoe, Debra	Wilmington	NC	28405
Barton, Ellen	North Augusta	SC	29841
Hayes, Debbie	Washington	IL	61571
Williams, Freddie	Blackstone	MA	1504
Britland, Alyssa	Florence	AZ	85132
Wenrich, Tanya	Selinsgrove	PA	17870
Collarini, Theresa	Scranton	PA	18519

White, Patricia	Bend	OR	97703
Galloway, Marge	Howell	MI	48855
Schroeck, Alexander	Simi Valley	CA	93065
Wisch, Anita	Valencia	CA	91355
Drew, Ja	Little Rock	AR	72207
O'Brien, Bill	Beaverton	OR	97005
Straub, Marcus	Grand Junction	CO	81507
Cicarelli, Maria	Miami	FL	33176
Perkins, Pamela	Newark	DE	19713
Barefield, Henrietts	Vestavia Hills	AL	35216
Abbott, Mary	Gaithersburg	MD	20878
Paduch, Karol	Durham	CT	6422
Stiffler, Tonya	Shoreline	WA	98133
Johannsen, Mary	Minneapolis	MN	55411
Ryan, Diane	Green Valley	AZ	85622
Briones, Andrea	Cupertino	CA	95015
Austin, Dawn	Phoenix	AZ	85032
	Marine On Saint		
Smida, Gail	Croix	MN	55047
Pardi, Marco	Lawrenceville	GA	30043
Matthews, Karen	Houston	TX	77007
Lucas, Hilary	Tenino	WA	98589
McDonald, Jeanne	Downingtown	PA	19335
Denton, Kathy	Daytona Beach	FL	32114
Naslund, Nancy	Port Townsend	WA	98368
Monfette, Aggie	Royal Oak	MI	48073
Tao, Carol	Salinas	CA	93901
LaBrant, Larisa	Arvada	CO	80002
Kane, Elaine	Fortuna	CA	95540
Allgood, Jean	Iowa City	IA	52245
Peterson, Lorri	Apache Junction	AZ	85119
Crawford, Holly	St Petersburg	FL	33701
Steele, Lisa	Roseville	CA	95661
Lerner, Michelle	Flanders	NJ	7836
Faunce, Sherrill	Moorestown	NJ	8057
Vohra, Deepak	Buena Park	CA	90621
Orr, Alicia	New Port Richey	FL	34654
Horn, Margaret	Lilburn	GA	30047
Henson, Lana	Oklahoma City	OK	73106
Tedesco, Terry	Phoenix	AZ	85016

Donofrio, Judy	South Burlington	VT	5403
Brimer, Sandra	Huntington Beach	CA	92649
Fechner, Joann	Kilauea	HI	96754
Djordjevich, Kathleen	Menlo Park	CA	94025
Thomas, Martha J	Dallas	TX	75220
Fletcher, Jeanne	Palm Harbor	FL	34685
Taylor, Ross	Fort Lauderdale	FL	33312
Rollie, Peggy	Erhard	MN	56534
Dunn, Connie	Lebanon	IL	62254
Katz, Michele	Beavercreek	OR	97004
Klass, David	New York	NY	10011
Ryan, Sally	Spicewood	TX	78669
Slonaker, Lynn	Pawling	NY	12564
Johnson, Keith	Muscoda	WI	53573
Curran, Sharon	Norwalk	CT	6850
Pollock, Sandra	Scottsdale	AZ	85255
Russell, Jan	Virginia Beach	VA	23456
Hammond-Dziak, Ronda	Woodstock	IL	60098
Lewis Brown, Katharine	Hedgesville	WV	25427
Christopher, Deanna	Scottsdale	AZ	85267
Nesbitt, Betsy	Sheffield	AL	35660
Klass, Naomi	New York	NY	10011
Carter, Edith	Harrisburg	OR	97446
Stadheim, Gretchen	Surprise	AZ	85379
Morris, Robert	Idamay	WV	26576
Graham, Dolores	Santee	CA	92071
Pedone, Chris	Golden	CO	80401
Roberts, Krysta	Denver	CO	80014
Koegler, Patricia	Berlin	IL	10717
Slonaker, John	Pawling	NY	12564
Horowitz, Christine	Castle Rock	CO	80108
Mikan, Edward	Demotte	IN	46310
Goldberg, Susan	Glendale	CA	91202
Kowall, Betty	Penngrove	CA	94951
Gustafson, Mary	Manhattan	IL	60442
McCredie, Gail	Aptos	CA	95003
Borske, Cindy	New Hampton	IA	50659
Baker, Anne	Va Beach	VA	23457
Brusin, Eugene	Quincy	MA	2169
Gunter, Vanessa	Worcester	MA	1609

Stolowich, Jane	Chicago	IL	60615
Goetze, Karen	Germantown	MD	20874
Hathaway, Melissa	Portland	OR	97230
Wolf, Rachel	Santa Cruz	CA	95060
Jenkins, Michael	Salina	KS	67401
Bertsch, Jennifer	Perham	MN	56573
Jurczewski, Carol	Riverside	IL	60546
Whitson, Helene	Berkeley	CA	94709
Ohlinger, Susan	Stratford	NJ	8084
Wickliffe, Charles	Show Low	AZ	85901
McBain, Bill	Ladysmith	WI	54848
Nickerson, Chelsie	Castle Hill	ME	4757
Hahn, Tanya	Kingsport	TN	37664
Chatfield, Sara	Evanston	IL	60201
Moore, Danielle	Chicago	IL	60611
Scott, J. David	Cottage Grove	OR	97424
Rubin, Allan	Philadelphia	PA	19116
Cohn, Nancy	Atascadero	CA	93422
Crist, Kathy	Cottonwood	AZ	86326
Wilson, Colette	Reston	VA	20191
Christopher, Angela	Cleveland	OH	44110
Gwinn, Anita	Amboy	WA	98601
Coffel, Lance	Fossil	OR	97830
Vaughn, Theresa	Denver	CO	80210
Johnson, Barbara	Rochester	NY	14626
Campbell, Pamela	Niederwald	TX	78640
Hollie, Paula	Laguna Woods	CA	92637
Izard, Stephanie	Thousand Oaks	CA	91360
Lowe, Kay	Thornton	CO	80233
Knaz, Julia	Mountainside	NJ	7092
Berzac, Susan	Castle Rock	CO	80109
Gray, Penny	Fairless Hills	PA	19030
McBain, Mel	Ladysmith	WI	54848
Belt, David	Springfield	MO	65804
Fletcher-Burroughs, Krystal	Palm Harbor	FL	34683
Cariello, W	North Baldwin	NY	11510
Cifra, Monique	Mesa	AZ	85207
Bailey, Kathleen	Elk Grove	CA	95758
Yates, Frances	Payson	AZ	85541
Kasbarian, A	Kenilworth	NJ	7033

Honold, Wendy	Sheboygan	WI	53081
Ray, Laura	Alexandria	VA	22312
Williams, Christina	Arnoldsville	GA	30619
Cregger-Marshall, Katherine	Charlotte	NC	28270
Lohler, Paula	North Oxford	MA	1537
Szerbaty, Michael	Cottonwood	AZ	86326
Trammell, Patty	Tecumseh	OK	74873
Bowers, Carla	Volcano	CA	95689
Frye, Mary Ellen	Rochester	NY	14609
Lees, Aubrey	New York	NY	10014
Read, Anne-Marie	Shelton	WA	98584
Coffman, Kathy	Tucson	AZ	85739
Schlueter, Shelly	Montour Falls	NY	14865
Solis, Joni	Kentwood	LA	70444
Floyd, Mary	Chamblee	GA	30341
Warp, Jean	Minneapolis	MN	55422
Ehrhardt, Timothy	Bridgeview	IL	60455
Erickson, Shelly	Slayton	MN	56172
Weiland, Sherry	Hudson	MA	1749
Le Baron, Nina	Anacortes	WA	98221
Kemp, Brenda	Dickson	TN	37055
Tucker, Barbara	Wellington	FL	33414
Ridgway, Kathi	Canal Winchester	OH	43110
Rosen, Carrie	Bronx	NY	10462
Gather, Sandra	Roseville	CA	95747
Kane, Jolyne	Orange	CT	6477
Olson, L	Wilson	WY	83014
Hammer, Teri	Van Buren Twp	MI	48111
Kapp, Kelly	Chandler	AZ	85249
Bergeron, Brad	Nashua	NH	3060
Mendez, Virginia	Hollywood	FL	33020
Robbins, Chris	Acworth	NH	3601
Trea, Connie	Winston	GA	30187
French, Aj	Corning	NY	14830
Warne-Brooks, Sheila	Vancouver	WA	98686
Weirich, Robin	Irvine	CA	92618
Eckert, Wendy	Johnson City	TN	37604
Smith, Tracy	Warren	TX	77664
Hastings, Trudy	Little Egg Harbor Twp	NJ	8087

Hall, Diane	Johnstown	PA	15902
Berger, Sarah	Ventura	CA	93003
Duquette, Carleen	Lee	MA	1238
Calderon, Yolanda	Oakland	CA	94609
Pritchett, Terry	Frisco	TX	75034
Falcoff, Tina	Lincolnshire	IL	60069
Carrier, Veronica	Trenton	MI	48183
Brownlee, Peg	Florence	MT	59833
Earnhart, Jennae	San Tan Valley	AZ	85143
Osborn, Richard	Green River	WY	82935
Wood, John	Maricopa	AZ	85139
Infield, Maryan	San Luis Obispo	CA	93401
Dudley, Jeri	Jamaica Plain	MA	2130
Celli, Sandra	Portsmouth	NH	3801
Jones, Pat	Deming	NM	88030
Johnson, Donald	San Tan Valley	AZ	85143
Sanders, Pam	Goreville	IL	62939
Brandreth, Julia	Los Angeles	CA	90046
MacLagan, Lynette	Arkdale	WI	54613
Peacock, Joshua	Scottsdale	AZ	85257
Mason, Kit	Silver Spring	MD	20902
Black, Joan	Arcanum	OH	45304
Valentiner, Sheryl	Payson	AZ	85541
Potts, Richard	Sun City West	AZ	85375
Cook, Cheryl	San Pablo	CA	94806
Braybrook, Erin	Arlington	WA	98223
Sullivan, Melissa	Colorado Springs	CO	80951
Knolla, Susan	Pittsford	NY	14534
Fante, Linda	Ventnor City	NJ	8406
Gill, Mariea	Medford	OR	97501
Odonnell, Karen	Eagle Mountain	UT	84005
Sagardua, Marina	Brighton	MA	2135
Earp, Marsha	Vanceboro	NC	28586
Hay, Misty	Santa Rosa	CA	95407
Adams, Catherine	Seattle	WA	98108
Rome, Karen	Greer	SC	29651
Carey, Madalynn	San Antonio	TX	78230
Ono, Lory	Kaneohe	HI	96744
Sophia, Tristan	Reed Point	MT	59069
Macy, Michelle	Houston	TX	77077

Kaplan, Jana	Suffern	NY	10901
W. Curtis, Judith	Albuquerque	NM	87121
Monahan, Claudia	La Quinta	CA	92253
Huffstickler, Yana	Fort Mill	SC	29715
Davis, Heidi	Tipp City	OH	45371
Klotz, Kelli	Parma	MI	49269
La Pierre, Dr. Sharon	Niwot	CO	80503
Claire, Loridan	Papeete	HI	98713
Mattson, Sally	Broomfield	CO	80021
Evans, Tania	Ann Arbor	MI	48103
Royce, Lynn	Bishop	CA	93514
Holtzman, Lawrence	Miami	FL	33173
Klein, Cynthia	Henniker	NH	3242
Norfleet, Mindy	Bend	OR	97701
Atkinson, Rita	Paynesville	MN	56362
Ellenberg, Jane	Millbrook	NY	12545
Ward, Rosemary	Greenville	MS	38701
Dehart, Jennifer	Milwaukie	OR	97222
Zollars, Teresa	Fresno	CA	93704
Rendigs, Richard And Kim	Falmouth	MA	2540
Benes, Michelle	Fairfield	IA	52556
Herbert, Julie	Saco	ME	4072
Earl, Faith	Sunbury	PA	17801
Ryan, Marilyn	Fort Worth	TX	76107
Crocco, Frances	Flemington	NJ	8822
Nadeau, J	Sanbornton	NH	3269
Ruiz, Aida	Norfolk	VA	23504
Peterson, Kerrie	Topanga	CA	90290
Siegel, Jean	Port Saint Lucie	FL	34986
Barulich, Maryann	New York	NY	10033
Austin, Veronica	Saint Clair Shores	MI	48081
Campbell, Susan	The Villages	FL	32162
Reidhead, Kathie	Payson	AZ	85541
Kawashima, Joan	Chino Hills	CA	91709
Thomson, Isabella	Prescott	AZ	86303
Salisbury, Francis	Queen Creek	AZ	85142
Meyer, Kurt	Coal Valley	IL	61240
Hensley, Bobbie	Greeneville	TN	37743
Knecht, Jill	Canfield	OH	44406
Berg, Marlia	Fairfax	CA	94930

Dufour, Chris	Le Havre	AP	76600
Mott, Karen	Greenlawn	NY	11740
Kiley, Christy	Fuquay Varina	NC	27526
Elvi, Mari	Forest City	NC	28043
Henderson, Sharon	Candia	NH	3034
Chanonhouse, Sally-Ann	Rockford	IL	61103
McCollim, Jeffrey	Painesville	OH	44077
Devinney, Claudia	Perry	NY	14530
Roberts, Jean	New Glarus	WI	53574
Graff, Wanda	Canby	OR	97013
Juliano, Regina	Medford	NJ	8055
McLaughlin, Robin	Bluffton	SC	29910
Ochoa-Rouunkles, Sherry	Villa Rica	GA	30180
Steiner, Silvia	San Rafael	CA	94901
Hancock, Jo Ann	Athens	AL	35611
Witzel, Andreas	Scottsdale	AZ	85262
Houtcooper, Anita	Mesa	AZ	85212
Baum, Miriam	Alta Loma	CA	91701
Hoople, Roxanne	New Auburn	WI	54757
Van Steelant, Darcy	Garden Valley	ID	83622
Dowling, Holly	Novato	CA	94947
Nolan, Linda	Tallahassee	FL	32308
Reese, Joyce	Maricopa	AZ	85138
Morris, DeLaina	Darrington	WA	98241
Frausto, Susan	Phoenix	AZ	85032
Summers, Ryan	Hendersonville	NC	28791
Krolikiewicz, Deborah	Austin	TX	78749
Heath, Kimberly	Knoxville	TN	37931
Wright, Katherine	Milford	MI	48381
Tutas, Diane	Mooreville	IN	46158
Penn, Paula	Encinitas	CA	92024
Baker, Dianne	Lockhart	TX	78644
Greenfield, Judy	Denver	CO	80237
Burch, Lilian	Rockville	MD	20852
Gunderson, Brent	Green Bay	WI	54303
Aman, Asfa	Fultonham	NY	12071
Duport, Carole	South San Francisco	CA	94080
Martino, Elizabeth	Ormond Beach	FL	32174
Elliott, Donna	Brookhaven	GA	30319
De Stefano, Ron	Woodland Park	NJ	7424

Donahue, Sharri	Henderson	NV	89052
LaBoda, Judith	Tucson	AZ	85745
Kultgen, Karry	Fredonia	WI	53021
Page, Linda	Los Angeles	CA	90066
Brocci, Jan	Missoula	MT	59803
Harris, Jeanie	Orange	CA	92869
Lowry, Cindy	Saco	ME	4072
Leinbaugh, Tracy	Athens	OH	45701
Gorton, Michelle	Kearney	NE	68845
Eckler, John	Lakewood	CO	80226
Coleman, Robin	Las Vegas	NV	89121
Publicover, Rosemary	Hingham	MA	2043
Shabbott, Mary	Punta Gorda	FL	33950
R., Amy	Austin	TX	78735
Peltan, Mark	Clinton Township	MI	48035
McCarthy, Susan	Winchester	VA	22603
Frazier, Maggie	Windsor	NY	13865
Hopkins, Candice	Bayfield	CO	81122
Sargent, Robert	Haverhill	MA	1832
Herzer, Susan	Windsor	CO	80550
Sloan, Elaine	New York	NY	10017
Hogan, Pamela	Reno	NV	89502
Lowry, Kirsten	Marysville	OH	43040
Lamont, Rebecca	Cold Brook	NY	13324
Bruegge, Debra	West Chester	OH	45069
Leveton, Lajeanne	Fleming Island	FL	32003
Bower, Sarahlynn	Wailuku	HI	96793
Yager, Signe	Edmonds	WA	98026
Murphy, Amber	Farmington	MN	55024
Caruso, Suzanne	Davis	CA	95616
Sekich, Dana	Kersey	CO	80644
Jaques, Rsc	Manchester	MA	1944
Fergeson, Cheryl	West Haven	UT	84401
Kawlewski, Angela	Seattle	WA	98116
Di Mond, Connie	Sandy Lake	PA	16145
Levins, Karen	Albuquerque	NM	87120
Plante, Melissa	Coconut Grove	FL	33133
Piehl, Jeanne	Hutchinson	MN	55350
Nicolai, Nicola	Chester Springs	PA	19425
Bindas, Janet	Walnut Creek	CA	94598

Watson, Mimi	San Anselmo	CA	94960
Hanger, Susan	Topanga	CA	90290
Young, Carolyn	Crawfordsville	IN	47933
Danielle, Giboin	Calimesa	CA	92320
Hartlieb, Matthew	Mesa	AZ	85208
Wright, Sheila	Grenada	CA	96038
Vanbeekum, Lin	Fountain Hills	AZ	85268
Mohr, Margaret	Fair Oaks	CA	95628
Dowling, Christopher	Marfa	TX	79843
Jordan, Regina	Scranton	PA	18509
Linden, Rae	Hamilton	MT	59840
Gray, Robin	Simi Valley	CA	93063
Kruppa, Muriel K	South Portland	ME	4106
Ricewasser, Robert	Monrovia	CA	91016
Stern, William	Euclid	OH	44132
Finlay-Kochankowski, Jeannie	Toledo	OH	43608
Gates, Elaine	Littleton	CO	80123
Rego, Sonia	Palm Coast	FL	32137
Swanson, Karen	Madison	WI	53719
Dahlgren, Deborah	East Hartford	CT	6118
Minford, Terri	Cooksville	MD	21723
People, Sheri	Burbank	CA	91505
Elliott, Donna	Brookhaven	GA	30319
Lilly, Evelyn	Durham	NC	27705
Haas, Claudia	Albuquerque	NM	87112
Belichick, Pate	Petaluma	CA	94954
MacFarlane, Adrienne	Ormond Beach	FL	32176
Stein, Judie	Agoura	CA	91301
Rock, Paula	Apache Junction	AZ	85120
Bomarito, Maryann	Marina	CA	93933
Miller, Heather	Palmetto Bay	FL	33158
Erpelding-Garratt, Liz	St Augustine	FL	32086
Garratt, Dave	St Augustine	FL	32086
Fritz, Ben	Wenatchee	WA	98801
Broad, Julia	Anaheim	CA	92804
Crane, Jo	Cleveland	OH	44123
Hansell, Judith	Napa	CA	94558
Meyer, Jenny	Craig	CO	81625
Nitecki, Mary	Republic	OH	44867
Barker, Richard	Beaverton	OR	97007

Aguzzi, Lynette	San Ramon	CA	94582
Mercado, Pedro	San Pablo	CA	94806
Holt, Randi	Palatine	IL	60067
Aden, Sandi	Lincoln	NE	68521
Strait, Susab	Red Oak	IA	51566
Douglas, Dianne	Phoenix	AZ	85042
Stephens, Natalie	Apple Valley	MN	55124
Mecke, Ernst	Helsingfors	CA	150
Gaboury, Denise	Newberry	FL	32669
Firestone, Lynne	Tucson	AZ	85750
Herzog, Tina	Slatington	PA	18080
McGraw, Donald	Ephraim	UT	84627
Egizi, Kate	Valley Center	CA	92082
Hanna, Rae	Dayton	NV	89403
Moore, Karen	Chelmsford	MA	1824
Franklin, Theresa Franklin	Fort McDowell	AZ	85264
Phenis, Alice	Willow Grove	PA	19090
Andersen, Patricia	Felton	CA	95018
Dishongh, Sue	Ashland City	TN	37015
Lynch, Jaremy	Brownfield	ME	4010
B, Barbara	Dedham	MA	2026
Smith, Marsha	Murfreesboro	TN	37127
Herwig, Gary	Baltimore	MD	21286
James, Janice	Avondale	CO	81022
Szczepanska Szostak, Wanda	GoleniŰw	AK	72100
Davis, Rita	White City	OR	97503
Piercey, Mary	New York	NY	10024
Lindgren, Leonard	Elgin	IL	60124
Anderson, Jane	Tempe	AZ	85284
Folch, Claudia	Tucson	AZ	85743
Croasmun, David	Peoria	AZ	85382
Karbon, Kelly	Scottsdale	AZ	85255
Nunez, Alane	Haltom City	TX	76117
Seltzer, Debrao	Aptos	CA	95003
Bailey, Pat	Sanford	FL	32773
Williams, Marta	Red Bluff	CA	96080
A., Colette	West Palm Beach	FL	33401
Pelka, Ursula	Edina	MN	55436
Rivas, Mary	Riverton	NJ	8077
Percival, Nick	Ridgefield	CT	6877

Perry, Sheri	Malibu	CA	90264
Rivas, Teresa	Riverton	NJ	8077
Genovese, R	Unionville	VA	22567
Rivas, Will	Riverton	NJ	8077
Wallach, Lorna	Lake Worth	FL	33467
Welp, Sandy	Ephrata	PA	17522
Speck, Caryl	Melbourne	FL	32940
Bosch, Eileen	Saratoga	CA	95070
Bergh, Colleen	Santa Ana	CA	92704
Bingham, L'Ann	La Honda	CA	94020
Franck, Faith	Las Vegas	NV	89134
Clark, Donna	Alhambra	CA	91803
Miettinen, Anne	Tre	AA	33500
Rojas, Paola	Coral Gables	FL	33134
Bico, Ann	North Chesterfield	VA	23236
Jackson, Denise	Coarsegold	CA	93614
Dangle, Patricia	Montoursville	PA	17754
Joo, Linda	Reno	NV	89521
Passman, Deborah	Prairie Village	KS	66208
Mulcare, James	Clarkston	WA	99403
Evans, J.L.	Compton	AR	72624
Moore, Karen	Chelmsford	MA	1824
Evans, Christine	Cupertino	CA	95014
Bowling, Alexandra	Goochland	VA	23063
Multer, Karen	Lenoir	NC	28645
Wilson, Deborah	Cloverdale	CA	95425
Kippen, Eileen	Traverse City	MI	49684
Jervis, Denise	Bronx	NY	10475
Serrano Osborn, Irene	Columbia	MO	65203
Kramer, Lisa	Huntsville	AL	35803
McNeese, Amanda	Jonestown	TX	78645
Ramos, Joann	Iselin	NJ	8830
Eaton, Kathleen	Middletown	DE	19709
Perez, Jaime	Saint George	UT	84790
Peterson, Elisabeth	Marion	MA	2738
Pettus, Beverly	Salisbury	MD	21801
Anderson, Rachel	Clayton	NC	27520
Kelly, Anne	Carmel	CA	93923
Allis, Nancy	Centennial	CO	80112
Foley, Karen	Marysville	CA	95901

McKittrick, Debra	Grass Valley	CA	95945
DeVore, Rosalie	Fernandina Beach	FL	32034
Fee, Audrey	Shelton	CT	6484
Raposa, Phyllis	Walnut Creek	CA	94595
Livingston, Ken And Jan	Mukilteo	WA	98275
Doherty, Alexis	Austin	TX	78732
Lofflin, Marilyn	Mesa	AZ	85208
Fee, Audrey	Shelton	CT	6484
Marie-Fran�oise, Voinot	Vaucouleurs	AL	55140
Stilwell, Callie	Aurora	CO	80017
Regen, Hamilton	Brooklyn	NY	11201
Boelman, Bonnie	Tucson	AZ	85730
Stevenson, Lee	Gold Canyon	AZ	85118
Maslin, Linda	Blue Bell	PA	19422
Fader, Judith	Tewksbury	MA	1876
Verplank, Lana	Surprise	AZ	85387
Lofflin, Marilyn	Mesa	AZ	85208
Wild, Kristen	Countryside	IL	60525
Stock, Sara	Edmonds	WA	98020
Wilkins, Keith	Mount Laurel	NJ	8054
Sugarman, Kathy	Henderson	NV	89012
Menges, Liz	Hammond	IN	46323
Smith, Sharon	Evansville	IN	47711
Gannaway, Holly	Burleson	TX	76028
Wilfing, Janice	Sequim	WA	98382
Renwick, Evelyn	Shippenville	PA	16254
Black, Lisa	Lewisville	TX	75057
Johnson, Gregg	San Jose	CA	95126
Korell, Lori	Minneapolis	MN	55418
Piercy, Marsha	Greenfield	IN	46140
Budin, Ilene	New York	NY	10011
Canonaco, Connie	Ottsville	PA	18942
Hufnagel, Glenn	Buffalo	NY	14215
Hitchcox, Diann	La Salle	CO	80645
Raimondo, Laura	Whiting	NJ	8759
Bernier, Rosemary	Norfolk	MA	2056
Bollman, Diane	Rock Falls	IL	61071
Young, Susan	Oak Creek	CO	80467
Montague, Sharon	Millsboro	DE	19966
Jones, Joseph	Bronx	NY	10463

Gaiti, Phyllis	Oxford	MD	21654
Burton, Patricia	Gaithersburg	MD	20877
Pearson, Oscar	Aubrey	TX	76227
Szumanski, Donna	New Castle	PA	16101
Fairfield, Peggy	Aiken	SC	29803
Northrup, Gene	Phoenix	AZ	85044
Holman, Linda	Truckee	CA	96161
Shamosh, J.	Phoenix	AZ	85016
Plishka, Debbie	Baldwinsville	NY	13027
Rose, Norma	Candler	NC	28715
Martin, Carol	Woodstock	GA	30188
Stockdale, Ann	Gig Harbor	WA	98335
Tryggeseth, Jackie	North Freedom	WI	53951
Wenger, David	Maricopa	AZ	85138
Ludlow, Marlene	Mount Shasta	CA	96067
Radford, Michael	Clay Springs	AZ	85923
Gilbert, Claudette	Redding	CA	96003
Howe, Jeff	Fort Lauderdale	FL	33308
Jonak, Debbie	Lyons	IL	60534
Fortier, Cornelia	Westport	CT	6880
Dykhuis, Shirley	Watauga	TX	76148
Johnson, Barbara	Rochester	NY	14626
Curatti, Susan	Crestline	OH	44827
Huffstickler, Arlene	Fort Mill	SC	29715
Joy, Kim	Wilson	NC	27893
Kantar, John	Minneapolis	MN	55416
Yoss, Jessica	Thornton	CO	80229
Hayenga, Jon	Stewartville	MN	55976
Doll, Holly	Horace	ND	58047
Hendricks, Marcia	Baytown	TX	77523
Salgado, Natasha	Pasadena	MD	21122
Ferraiuolo, Rae	Vashon	WA	98070
Brown, Lindie	Hastings	NE	68901
Macias, Sherry	Sacramento	CA	95825
Papa, Gail	Rochester	NY	14624
Goerke, Carol	Tempe	AZ	85281
Reinfried, Kay	Lititz	PA	17543
Douglas, Dianne	Phoenix	AZ	85042
Wyenandt, Patricia	Cincinnati	OH	45244
Jehn, Robert	Cochran	PA	16314

Cutts, Bruce	Greeley	CO	80634
Surchik, Karen	Mesa	AZ	85205
Hansen, Jill	Fair Oaks	CA	95628
Miller, Corinne	El Cajon	CA	92020
Guimont, Rita	Moravian Fls	NC	28654
Stevens, Mary	Winter Park	FL	32792
Miller, Elaine	Whitinsville	MA	1588
Thiese, Barb	Mission Viejo	CA	92692
Barrett, Jackie	Silver Springs	FL	34488
Nolte, Gwen	Lakewood	WA	98498
Bryant, Lauren	La Crescenta	CA	91214
McKittrick, Debra	Grass Valley	CA	95945
LaBella, Cindy	Sherman Oaks	CA	91423
Murrow, Stacey	Edgewood	MD	21040
Charest, Roberta	Savannah	GA	31419
Gibson, Jody	Des Moines	IA	50315
Karpf, Robin	Wickenburg	AZ	85390
Karen, Karen	Scottsdale	AZ	85257
Miller, Elaine	Whitinsville	MA	1588
Mauer, Roger A	Ignacio	CO	81137
Defeo, Laura	Wapiti	WY	82450
Holy, Dominique	Los Angeles	CA	90064
Hendrixson, Allyn	Temple	NH	3084
Poritzky, Robin	Poughkeepsie	NY	12603
Shirey, Linda	Okeechobee	FL	34974
Ross, Patsy	Ball Ground	GA	30107
Silver, Amanda	Hedgesville	WV	25427
Artinian, Emily	Ann Arbor	MI	48103
Provenzano, Rosemary	Roselle	IL	60172
McCrink, Laurel	Rancho Santa Fe	CA	92067
Paris, Al	San Diego	CA	92106
Selbin, Susan	Albuquerque	NM	87104
Smith, Susan	Greenwich	CT	6830
Mohl, Dan	Sarasota	FL	34240
Daniels, Dottie	Rancho Santa Fe	CA	92091
Krzewinski, Bob	Ypsilanti	MI	48198
Willroth, Alana	White Bear Lake	MN	55110
Eng, Richard	Hancock	NY	13783
Squires, Lynda	Brockport	NY	14420
Steelhammer, Joan	Bend	OR	97701

Rubin, Bill	Decatur	GA	30033
Turner, Janet	Fairfax	CA	94930
Urban, Patricia	Topeka	KS	66609
Bridges, Kenneth	Joshua	TX	76058
Brinkman, Lisabette	Santa Barbara	CA	93101
Welden, Lisa	Austin	TX	78721
Jones, Donna	Herndon	VA	20171
Rodgers, Patricia	Kirkland	WA	98034
Basiewicz, Kathleen	Hendersonville	NC	28724
Herman, Mark	Bowling Green	OH	43402
Hilton, Michael	New Lenox	IL	60451
Trandem, Lori	South Saint Paul	MN	55075
Perkins, Jane	Loveland	CO	80537
Simmons, Donna	Visalia	CA	93277
Murphy, Brigid	Chino	CA	91710
Goodnight, Debra	Massillon	OH	44646
Hahn, Ryan	Lebanon	OH	45036
Jacobs, Nancy	Salem	VA	24153
Ducay, Terri	Menlo Park	CA	94025
Danley, Meghann	Roseville	CA	95678
Yorgan, Mary	West Hills	CA	91304
White, Phyllis	El Dorado Hills	CA	95762
Sloan, Sheila	Bolivia	NC	28422
Specht, Marilyn	Atlanta	GA	30324
Stales, Steve	Philadelphia	PA	19154
Lapenson, Ronnie	Scottsdale	AZ	85259
Unger, Michelle	Portland	OR	97209
Martinez, Andrea	Simpsonville	SC	29680
Jordan, Jim	Apache Junction	AZ	85120
Vallo, Joyce	Wheaton	IL	60189
Harrison, Scott	Gig Harbor	WA	98322
Stanton, Sue	Durham	NC	27712
Martell, Jon	Westerly	RI	2891
Gummel, Janis	Cleveland	GA	30528
Garrison, Barbara	Encino	CA	91436
Pfutzner, Angelika	Salt Lake City	UT	84103
Simon, Katherine	Hagerstown	MD	21740
Pape, M C	Eloy	AZ	85131
Hoopas, Beatrice	Alliance	OH	44601
Drummond, Anna	Grass Valley	CA	95945

Rivas, Terry	Peoria	AZ	85382
Caperton, Alice	San Jose	CA	95127
Saavedra, Jasmine	Philomath	OR	97370
Costa, Sandra	Texon	TX	75457
Griepsma, Debi	Fontana	CA	92335
Murphy, Pat	Gloucester	MA	1930
Noe, Tori	Ypsilanti	MI	48197
Kehm, Michelle	Miami	FL	33157
Icenhour, Kimberly	Sparks	NV	89436
Kolbe, Kd	Woodbine	MD	21797
Olsen, Loretta	Wilmington	OH	45177
Smith, Linda	Enfield	CT	6082
Rodgers, Camie	Radcliff	KY	40160
	Palm Beach		
McClellan, Suzanne	Gardens	FL	33412
Hufnagle, Linda	Mc Sherrystown	PA	17344
Falsetto, Rita	Aguilar	CO	81020
Holzendorf, Victoria	Lake Oswego	OR	97034
Bhindie, Sheena	Northridge	CA	91325
Craig, Laura	Apollo Beach	FL	33572
Koester, Sharon	Terre Haute	IN	47804
Boice, Ruth	Shamong	NJ	8088
Storace, Michelle	Danville	CA	94506
Godin, Kathy	South Beach	OR	97366
Williams, Sherry J	Twin Falls	ID	83301
Wieland, Beth	Eau Claire	WI	54701
Clark, Carl	Great Falls	MT	59404
Bashen, Melinda	Reston	VA	20191
Thormanan, Gay	West Caldwell	NJ	7006
Helin, Colette	Mason City	IA	50401
Gindele, Abigail	Portsmouth	NH	3801
Fink, Wendy	Jersey Shore	PA	17740
Genandt, Judy	East Dundee	IL	60118
Eisenhauer, Carolyn	Mesa	AZ	85207
Stapler, Carl	Evanston	WY	82930
Nolen, Maria	Concord	MA	1742
Martin, Sharron	Surprise	AZ	85388
Smith, Linda	Enfield	CT	6082
Sweig, Karen	Phoenix	AZ	85050
Gajate, Serafina	Volcano	HI	93785

Luly, Jill	North Tonawanda	NY	14120
Schneider, Sharon	Sparks	NV	89441
K, Melissa	South Heights	PA	15081
Sidelnikova, Julia	Scottsdale	AZ	85251
Metivier, Jonathan	Middletown	CT	6457
Langford, Bonnie	Plainfield	CT	6374
Kotkyar, Sofia	Denver	CO	80231
Carney-Feldman, Catherine	Ipswich	MA	1938
Drew, Karen	Jean	NV	89019
Sanders, Beth	West Jordan	UT	84084
Klapperich, Hunter	Stanley	WI	54768
Otero, Julia	Scottsdale	AZ	85251
Howard, Cathy	Scottsdale	AZ	85257
Luna, Andrea	Fallbrook	CA	92028
Ugolik, Lori	Silver Springs	NV	89429
Moy, Kristine	Grosse Pointe	MI	48230
Madigan, Sally	Meadow Vista	CA	95722
Stark, Louise	Phoenix	AZ	85007
Bono, Roberta	Aurora	CO	80017
Waldroup, Linda	Walnut Creek	CA	94595
Helmstadter, Kim	Mesa	AZ	85202
Robertson, Jill	Amador City	CA	95601
Kramer, Mary	Redmond	WA	98052
Gyure, Stephanie	Monrovia	CA	91016
Golembiewski, Deborah	Buffalo	NY	14211
Novak, Sherin	Colorado Springs	CO	80908
Coppersmith, Terri	Westminster	MD	21158
Shokohi, Azhand	Maineville	OH	45039
Pollak, Jeannie	Oxnard	CA	93036
Sobecke, Patti	West Allis	WI	53227
Marge, Debra	Shamokin	PA	17872
Skarning, Melanie	Salt Lake City	UT	84121
Hollon, Bob	Orlando	FL	32806
Green, Jamie	Ventura	CA	93004
Copper, David	Staunton	VA	24401
Tamarack, Michael	Tucson	AZ	85705
Kammerud, Lance	Blanchardville	WI	53516
Davis, Glynis	Spicewood	TX	78669
Chroneos, Carol	Colorado Springs	CO	80918
Hollon, Hollie	Orlando	FL	32806

Matthews, Suzanne	Port Charlotte	FL	33952
Clements, Ferne	Cleveland	OH	44111
Rozier, Shirley	Gardnerville	NV	89410
Lenardson, Denise	Sunland	CA	91040
Michelson, Sue	Studio City	CA	91604
Smith, Sandra	Anacortes	WA	98221
Johnson, Martha	Chandler	AZ	85248
Harwood, Peter	Lemoore	CA	93245
Hackney, Rosemary	Mount Juliet	TN	37122
Merlesena, Michael	Carlsbad	CA	92008
McKee, Shelley	Pataskala	OH	43062
Morey, Lorilie	Santa Rosa	CA	95401
Wilke, Nicole	Miami	FL	33166
Held-Warmkessel, Jeanne	North Wales	PA	19454
Poland, Barbara	La Crescenta	CA	91214
Barton, Kay	North Las Vegas	NV	89081
Marro, John	Chicago	IL	60638
Campbell, Linda	Chagrin Falls	OH	44023
Loughnane, Susan	Chino Valley	AZ	86323
Huntley, Vivian	Tryon	NC	28782
Wolfsohn, Sharon	Hartland	WI	53029
Stopfer, Maxine	Felton	DE	19943
Baier, Mary Ann	Dearborn	MI	48124
Hayes, Debbie	Dixon	CA	95620
Loughnane, Susan	Chino Valley	AZ	86323
Consbruck, Barbara	Sylmar	CA	91342
Head, Cynthia	Apache Junction	AZ	85120
Fritz, Deborah	Cherry Hill	NJ	8003
Todd, Kathleen	Minneapolis	MN	55406
Benfield, Virginia	Austin	TX	78738
Petrie, Sharon	Mira Loma	CA	91752
Rager, Melissa	Kempton	IN	46049
Andaloro, Bernadette	East Syracuse	NY	13057
Wanenmacher, Erika	Santa Fe	NM	87505
Burbage, Kim	Smithfield	VA	23430
Maloney, Joyce	Sterling	MA	1564
Anderson, Pat	Ebensburg	PA	15931
Edwards, Belinda	Choctaw	OK	73020
Sutherland, Sonja	McPherson	KS	67460
Brouillet, Ellen	Berwick	ME	3901

Thomas, Karen	Norman	OK	73072
Baenziger, Greg	Polk City	IA	50226
Arnold, Charles	Manchester	NH	3105
Wolf, Karen	Baltimore	MD	21224
Schmautz, Kathleen	Woodhaven	NY	11421
Rammel, Vicki	Franklin	NC	28734
McCrystal, John	Boulder	CO	80306
Fuqua, Chad	Houston	TX	77080
Baker, Suzanne	Carson City	NV	89701
Leckliter, Linda	Prairie Du Chien	WI	53821
Nelson, Deborah	Simi Valley	CA	93065
Fultz, Margie	Vanleer	TN	37181
Harris, Shirley	Willits	CA	95490
Klunder, Christine	Bellingham	WA	98225
Wooten, Diane	Needles	CA	92363
Bonner, Tracey	Arlington	TX	76014
Golemo, Bozena	Danielson	CT	6239
Johnston, Tracy	Uniontown	OH	44685
Messenger, Patricia	Overgaard	AZ	85933
Salek, Diane	Nutley	NJ	7110
Wayne, Susan	Loma Linda	CA	92354
Kett, Georga	Dallas	TX	75228
Harris, Lauren	Teton Village	WY	83025
Johnson, Susan	Climax	NC	27233
Wiley, Denise	Bakersfield	CA	93314
Mathews, Janet	Scottsdale	AZ	85258
Yurkanin, Eric	Atlanta	GA	30309
Dormizzi, Candyce	Trabuco Canyon	CA	92679
Flansburg, Marcia	Glenmont	NY	12077
Muller, Debbie	Springfield	IL	62702
Coyle, Nora	Anaheim	CA	92807
Loney, Sandy	Brainerd	MN	56401
Piraino, Maureen	Pottstown	PA	19465
Love, Diane	Catalina	AZ	85739
Nelson, Rebecca	Kimball	MI	48074
Knowlton, Madeleine	Danville	CA	94526
Mackraz, Barbara	Palo Alto	CA	94306
Bush, Sarah	Lincoln	NE	68502
Lutz, Lynn	Depoe Bay	OR	97341
Turner, Phyllis	Winslow	AZ	86047

Manganiello, Joanna	Noble	OK	73068
Jones, Tod	Eugene	OR	97402
Denney, Dianne	Colon	MI	49040
Anderson, Edna	Beloit	WI	53511
Lima, Denise	Metuchen	NJ	8840
Swyden, Barbara	Rio Rancho	NM	87124
Mackowski, Judy	Pierson	FL	32180
Hendrixson, Jacquelyn	Temple	NH	3084
Brown, Nancy	Black Mountain	NC	28711
Baynar, Cathy	Westminster	MD	21157
Tomsits, Pati	Irvine	CA	92620
Erny, Susan	Wurtsboro	NY	12790
Horan, Marie	Epsom	NH	3234
Neumayer, Patty	Scottsdale	AZ	85254
Frederick, Carolyn	High Springs	FL	32643
Koplowitz, Susan	Brooklyn	NY	11235
Clark, Michele	Chapel Hill	NC	27514
Eisenberg, Paul	Bloomington	IN	47401
Von Der Linden, Madeline	Henderson	NV	89012
Wolff, Alcinda	Sparks	NV	89441
Ruehlow, Donna	Watertown	WI	53094
Crockett, Scott	Florence	OR	97439
Kaiser, Diana	Newburgh	NY	12550
Brooks, Virginia	Minneapolis	MN	55406
Weiss, Cheryl	Granite City	IL	62040
Greenway, Kathryn	Dammeron Valley	UT	84783
Putman, Carol	Casa Grande	AZ	85122
Koons, Mona	Chandler	AZ	85286
Carter, Karen	Lancaster	PA	17602
Meyer, Stephanie	Tempe	AZ	85282
Vollmann, Nancy	Mishawaka	IN	46544
Johnston, Ann	Brighton	CO	80601
Maillot, Nathalie	Angers	CA	49100
Altenbach, Marilyn	Lawrenceburg	IN	47025
Berryman, Ryan	Glendale	AZ	85306
Nunez, P	Summerfield	FL	34491
Lane, Anne	Parrish	FL	34219
Dombrowski, Bonita	South Pasadena	CA	91030
White, Virginia	Ryan	OK	73565
Martin, Lisa	Evans	GA	30809

Chavez, Yvonne	Carlsbad	CA	92008
Lambert, Jeffery	Glendale Heights	IL	60139
Blades, Margaret	Lansdale	PA	19446
Wohlberg, Robert	Richfield	MN	55423
Kenna, Jackie	Half Moon Bay	CA	94019
Payne, Renata	Salinas	CA	93901
Davison, Katherine	Apache Junction	AZ	85120
Nelson, L	Morgan Hill	CA	95038
Shepherd, Karen	Topeka	KS	66614
Penn, Ruthanne	Payson	AZ	85541
Majewski, Catherine	Hampshire	IL	60140
Logan, Deidre	Orem	UT	84057
Goade, Jennifer	Sun Valley	NV	89433
Porretta, Byron	Cochise	AZ	85606
Perez, Elena	Bronx	NY	10463
Hurlburt, Sg	Portland	OR	97220
Publiee, Jean	Flemington	NJ	8822
Kliban, Judith K	Corte Madera	CA	94976
Palmer, Kim	Sedona	AZ	86336
Allis, Lisa	Houston	TX	77019
Fox, Kathleen R	Eugene	OR	97402
Sharp, J	Dallas	TX	75228
Lapointe, Kenneth	Los Angeles	CA	90031
Akers, Jodi	Apache Junction	AZ	85119
MacDonald, Theresa	Centerville	TN	37033
Stimson, Sunshine	Gilbert	AZ	85234
Maki, Kymberlee	Ludington	MI	49431
Sacco, Maria	Pepperell	MA	1463
Bp, Donna	Longmont	CO	80501
Scott, Lynda	Decatur	IN	46733
White, Dawn	Arlington	TX	76014
Solomon, Cynthia	Grand Prairie	TX	75054
Haddad, Reem	La Verne	CA	91750
Fraser, Ryan	Homestead	CA	33457
Vintilla, Joanna	Seattle	WA	98133
Duncan, Amanda	Rocklin	CA	95677
Falsetto, Rita	Aguilar	CO	81020
Perry, Anithra	Winchester	CA	92596
Jackson, Jimmy	Olathe	KS	66061
Doering, David	San Francisco	CA	94109

Pierce, Lynn	Palm Bay	FL	32907
Schneider, Danielle	Pickens	SC	29671
Walker, Frank	Phoenix	AZ	85032
Markham, Michael	Matthews	NC	28105
Waddington, Kenneth	Fredericktown	MO	63645
Honore, Stephanie	Kissimmee	FL	34759
Griggs, Heidi	Dundalk	MD	21222
Chmel, Bob And Kim	Scottsdale	AZ	85262
Thompson, Paula	San Diego	CA	92117
Moore, Belinda	Huntington	TX	75949
Tierney, Jill	Tucson	AZ	85730
Godwin, Doris	Alpharetta	GA	30022
Parr, Carmel	Phoenix	AZ	85022
Paquette, Teri	Arlington	TX	76016
Nitz, Jennifer	Missoula	MT	59802
Singer, Sarah	Dekalb	IL	60115
Boern, Mixi	Dallas	TX	75228
Bechtolt, Phoebe	Durango	CO	81303
Lemming, Sunny	Dayton	NV	89403
Wouk, Nina	Redwood City	CA	94063
Ruether, Marsha	San Diego	CA	92129
Groves, Janet	Clarksdale	MS	38614
Kjono, Pamela	Grand Forks	ND	58201
Freeman, Travis	Stockton	CA	95203
Lukensmeyer, Pat	Tucson	AZ	85711
Emmerson, Ann	Lancaster	KY	40444
Lindeman, Dianne	Gilbert	AZ	85297
Gee, Vanyoska	New York	NY	10002
Brooks, Darcy	Aurora	CO	80017
Fedorov, Kristina	Maryland	NY	12116
McDaniel, Pamela	Menlo Park	CA	94025
Warren, Leigh	Spring Hill	FL	34606
Santangelo, Roseann	Chino Valley	AZ	86323
Steele, Kate	Omaha	NE	68124
Wilkerson, Linda	Oakland	CA	94603
Howerton, Tracy	Chandler	AZ	85225
Smith, Donna	Havertown	PA	19083
Corby, Kathleen	Pine Plains	NY	12567
Ruth, Barbara	San Jose	CA	95125
Wampler, Dorothy	Mesa	AZ	85207

B, Meta	Dallas	TX	75228
Denman, Linda	Cazenovia	WI	53924
McDonald, Joyce	Webster	NY	14580
Trela, Christine	Huntington Beach	CA	92646
Steinberg, Arlene	Philadelphia	PA	19115
Warden, Lisa	Belmont	CA	94002
Kiser, Cynthia	Sacramento	CA	95825
Kuciej, Walter	Seattle	WA	98199
Maggy, Linda	Hayward	CA	94542
Thompson, Janice	Santa Clarita	CA	91350
Romberger, Cynthia	Chandler	AZ	85225
Luke, Linda	Belleville	MI	48111
Stewart, Sarah	Watertown	MA	2472
Thompson, Sabrina	El Dorado Hills	CA	95762
Waldvogel, Karen	Chula Vista	CA	91910
Sines, Charlotte	Yosemite	CA	95389
Welling, Jeannette	Thousand Oaks	CA	91362
Henry, Mark	Saint Augustine	FL	32080
Winnubst, Karen	Cedar Hill	TX	75104
Grace, Christina	Crestwood	KY	40014
Rounds, Jill	Arroyo Seco	NM	87514
Clemente, Richelle	Reading	PA	19607
Corrigan, Jennifer	Snohomish	WA	98290
Scott, Mary	Kitty Hawk	NC	27949
Robinson, Lore	Sauquoit	NY	13456
Keene, Jessica	Atlanta	GA	30342
Anderson, Pj	Saline	MI	48176
Rafferty, Bernard	Marlboro	NY	12542
Baer Greene, Gwen	Baton Rouge	LA	70808
Mistelske, Diann	Hilliard	OH	43026
Roegner, Debby	West Bend	WI	53095
DeNoni, Lana	Kamloops	AP	56954
O'Brien, Daniel	Milton	NY	12547
Cullen, Anaya	Nashville	TN	37209
DeNoni, Lana	Kamloops	AP	56954
Vana, Cheryl	Casa Grande	AZ	85194
Reed, Jennifer	Saint Charles	MO	63301
Webert, Evelyn	Princeton	TX	75407
Thomas, Efrem	Tucson	AZ	85742
Melko, Lanna	Dyer	IN	46311

Saunders, Maurice	Port Charlotte	FL	33954
Barnett, Lynn	Northbrook	IL	60062
Rafuse, Donna	Rapid River	MI	49878
Steele, Jenifer	Lake Balboa	CA	91406
Nicasio, Daisy	New York	NY	10032
Simpson, Malcolm	Las Vegas	NV	89104
Banks, Donna	Orlando	FL	32812
Emley, Virginia	Kansas City	MO	64113
Fornelli, Susan	El Cajon	CA	92021
Dunn, Robbin	Farmington	CT	6032
Gouge, Gerald	Athens	GA	30605
Rice, Mary	Chicago	IL	60641
Shats, Tatyana	San Francisco	CA	94109
Hahn, Jerry	Madison	AL	35756
Ross, Shannon	Grass Valley	CA	95945
Patt, Jessica	Mesa	AZ	85213
Wiggin, Beverly	Pembroke	MA	2359
Yansick, Melanie	Mesa	AZ	85208
Neuburg, Jeanne	Sussex	WI	53089
I., Kate	Fort Collins	CO	80521
Jensen, Jean	Graham	WA	98338
Loreaux, Brionna	Mesa	AZ	85208
Evins, Barbara	Phoenix	AZ	85008
Patt, Michael	Mesa	AZ	85213
	Palm Beach		
Burke, Maureen	Gardens	FL	33418
Johnson, Rebecca	Phoenix	OR	97535
Reynaud, Barbara	Miami	FL	33155
Thurairatnam, Susan	North Olmsted	OH	44070
Still, Alexandra	Oberlin	OH	44074
Hebert, Melanie	Springfield	MA	1105
Lanteri, Jonna	Fort Collins	CO	80526
Searle, Karyn	Maple Shade	NJ	8052
Breithaupt, Catherine	Dallas	TX	75204
Villa, Beatriz	Hermitage	TN	37076
Wouk, Fay	Boulder	CO	80304
S, A	Alameda	CA	94501
Daniels, Bobbie	Camden	SC	29020
Basir, Schantz	Ellicott City	MD	21042
Potter, Doris	Saint-Laurent	CA	0

Kirk, Gale	Newport Beach	CA	92660
Buscemi, Donna	Street	MD	21154
Brandt, Sara	Brooklyn	NY	11201
McCrea, Megan	San Antonio	TX	78217
Malzahn-Bass, Katherine	Reno	NV	89511
Martino, Blain	St-Laurent	CA	0
Freeman, Karen	San Antonio	TX	78254
Wilson, Jacki	Avondale	AZ	85392
Sanderson, Laurie	Orlando	FL	32824
Link, Anne	Lake Worth	FL	33463
Crawford, Tracy	Mt Pleasant	MI	48858
Pellegrino, Maddox	Mays Landing	NJ	8330
Atkins, Michelle	Cape Coral	FL	33914
Suggs, Joyce	Phoenix	AZ	85050
Burns, Christy	Clinton Township	MI	48036
Harper, Rosa	Albuquerque	NM	87106
Bratton, Ronda	Cleburne	TX	76031
Ancel-Wisner, Annette	Shell Lake	WI	54871
Schwartz, Brieanah	Marshall	VA	20115
Wardowski, Ann	Hillsboro	OR	97124
Steininger, Donald	Belmont	OH	43718
Steininger, Linda	Belmont	OH	43718
Occhialini, Karin	Garden Valley	CA	95633
Wolcott, Leslie	Santa Rosa	CA	95405
Koch, Joann	Lebanon	CT	6249
Roberts, Amy	Albany	OR	97321
Rice, Donna	Elkton	MD	21921
Crank, Susan	Redondo Beach	CA	90277
Toth, Myra	Ojai	CA	93024
Warfield, Melissa	Farmington	MN	55024
Brown, Mary	Bolton	MA	1740
Zizzo, Dawn	Lake Stevens	WA	98258
Battistessa, Gerri	Petaluma	CA	94952
Byrnes, Leslie	Albuquerque	NM	87114
Gomez, Brenda	Deforest	WI	53532
Kherson, Milla	Deerfield	IL	60015
Knasas, Marie	Apache Junction	AZ	85119
Scharmann, Sigrid	Colfax	CA	95713
Kageorgis, Yana	Peyton	CO	80831
Mallery, Patricia	Marble Falls	TX	78654

Pearson, Melissa	Kingsport	TN	37660
Robinson, Dameta	Plover	WI	54467
Rohrbeck, Patricia	Carlsbad	CA	92008
Jones, Jennifer	Hazard	KY	41701
Baier, Palmeta	Kirksville	MO	63501
Martens, Wynn	Boulder	CO	80303
Azari, Barbara	Sacramento	CA	95865
Armstrong, Diane	Laguna Woods	CA	92637
Wyatt, Carolyn	Bay City	MI	48708
Fain, Glenn	Seattle	WA	98144
Andrews, Becky	Baton Rouge	LA	70810
Fish, Bruce	Oaklyn	NJ	8107
Howard, Karen	Port St Lucie	FL	34953
Hardzinski, Mary	Bloomington	IL	61705
James, Phil	Bloomington	IN	47402
Taylor, Carmen	Fort Myers	FL	33919
Rocha, Beba	Camp Verde	AZ	86322
Oggiono, Nanette	Upton	MA	1568
Dixon, Joyce	Dallas	TX	75219
Truneckova, Blanka	Salem	OR	97302
Brown, John	Camp Hill	PA	17011
Emmert, Patricia	Austin	TX	78741
Lindemann, Erica	Steamboat Springs	CO	80487
Barnes, Beth	Annapolis	MD	21401
Kop, Jonelle	Tavernier	FL	33070
Smith, Awilda	Brandon	FL	33510
Wallace, Linda	Eugene	OR	97402
Conley, Carolyn	Sierra Madre	CA	91025
DeChirico, Donna	Flushing	NY	11355
Good, Sharon	Pearce	AZ	85625
Eagle, Reverend Jane	Graton	CA	95444
Fay, Joan	Burbank	IL	60459
Buchholz, Lynn	Akeley	MN	56433
Valin, Laurel	Irvine	CA	92620
McMillen, Shannon	Surprises	AZ	85374
Baker, Lynn	Port Saint Lucie	FL	34952
Kludy, Barbara	Odenton	MD	21113
Dare, Cheryl	Memphis	TN	38104
Wilkinson, Karen	Peterborough	SC	54222
Boyd, Janet	Morris	IL	60450

Bernhardt, James	Payson	AZ	85541
Collins, Cassandra	San Diego	CA	92116
Kaspar, Tamara	Lockport	IL	60441
Holman, Marcia	Fullerton	CA	92835
Kirsh, Julie	Shrewsbury	NJ	7702
Darling, Carrie	Phoenix	AZ	85022
Wilke, Wendy	Fresno	CA	93720
Welter, Sandra	Lakewood	OH	44107
Clawson, Deb	Lansing	MI	48910
Casner, George	Phoenix	AZ	85023
Rising, Crimson	Campobello	SC	29322
Van Gundy, Valrey	McMinnville	OR	97128
Kaiser, Deborah	Parlin	NJ	8859
Dorlando, Diane	East Boston	MA	2128
Mulvey, Greg	New York	NY	10950
Pryor-Luzier, Maresa	Edgewood	NM	87015
Tokarz, Joan	Bristol	RI	2809
Bierman, Elaine	San Diego	CA	92128
Michelle, Martine	Monroe	NY	10950
Bevan, Joan	Kingston	NH	3848
Joy, Rick	Pinetop	AZ	85935
Grady, Catherine	Bois D Arc	MO	65612
Brown, Sy	Northbrook	IL	60062
Lee, Candy	Mill Valley	CA	94941
Lambert, Laura	North Saint Paul	MN	55109
Whiteman, M Andrew	Alamogordo	NM	88310
Mathis, Linda	San Antonio	TX	78249
Or, Nancy	Newark	DE	19711
Blodgett, Lisa	Mill Valley	CA	94941
Reifman, Jamie	Chicago	IL	60660
DeSantis, Amy	Hanover	NH	3755
Douglas, Deborah	Reynoldsburg	OH	43068
Weber, Sandra	Toledo	OH	43615
Hough, Mark	Scottsdale	AZ	85260
Robinson-Paquette, Melinda	Riegelsville	PA	18077
Hall, Cynthia	Nicholasville	KY	40356
White, Jean	Springfield	PA	19064
Soos, Nicole	Loveland	CO	80537
Thompson, Lynn	Apache Junction	AZ	85120
Somers, David	York	PA	17408

Goforth, Tiffany	Tucson	AZ	85705
Mast, Mirtella	Jacksonville	IL	62650
Burk, Bill	Bend	OR	97707
Venture, Marlene	North Ridgeville	OH	44039
Giguere, Milla	Anderson	CA	96007
White, Kim	Kissimmee	FL	34741
Kalfayan, Stephanie	Bellevue	WA	98004
Wickemeyer, Brenda	Cincinnati	OH	45244
Breeding, Connie	Alamogordo	NM	88310
Hopper, William	Howell	MI	48843
Mangrum, Tina	South Bend	IN	46628
Cyr, Anette J	Petoskey	MI	49770
Whitworth, Amy	Portland	OR	97214
Goldberg, Lynn	Rio Rancho	NM	87144
Miller, Cindy	Apache Junction	AZ	85119
Reedy, Suni	Honolulu	HI	96814
Gallagher, Dave	Mesa	AZ	85213
George, Diane M.	Henderson	NV	89052
Link-New, Virgene	Anacortes	WA	98221
Gallagher, Vicki	Mesa	AZ	85213
Fifer, Dolores	Pittsburgh	PA	15201
Ray, Marianne	Ontario	CA	91761
Smith, Lee	Boise	ID	83709
Gilmore, Joyce	Kutztown	PA	19530
Hendricks, Marcia	Baytown	TX	77523
Evans, Rebecca	Crockett	CA	94525
Achey, Barbara	Union Dale	PA	18470
Bennett, Marion	M	MO	60350
Achey, James	Union Dale	PA	18470
Thompson, Bree	Morrison	CO	80465
Bradley, Stacey	Hastings	PA	16646
Copps, Terri	Minneapolis	MN	55416
Maas, Monique	Anacortes	WA	98221
Biesterfeld, Rich	Mesa	AZ	85212
Jaeger, Susie	Rohnert Park	CA	94928
Kilgore, Nancy	Blythewood	SC	29016
Sewald, Michelle	Denver	CO	80202
Kadlec, Kirsten	Raleigh	NC	27603
Lewis, Debra L	Hayward	CA	94541
Sinclair, Cynthia	Springfield	OR	97478

Salinas, Ana	Austin	TX	78737
Petersen, Ann	Ankeny	IA	50023
Quinn, Tim	Sulphur	LA	70665
English, Donna	Chimacum	WA	98325
Stinnett, Julie	Alpine	TX	79830
Larson, Laurie	Florence	AZ	85132
	Marine On Saint		
Seely, Jennifer	Croix	MN	55047
Laporte, Candace	Las Vegas	NV	89147
Gardner, Cinda	Milford	IN	46542
Drees, Heather Aka Heth	Grand Forks	ND	58201
Taylor-Smith, Terie-Lee	Issaquah	WA	98027
Swistak, Karen	Newmarket	NH	3857
Bray, Donna	Griswold	CT	6351
Koch, Stella	Glade Park	CO	81523
Woodall, Sandra	San Antonio	TX	78212
Knuthson, Keri	Paradise	CA	95969
Gary, Frederick E	Farmington	NY	14425
Horwitz, Martin	San Francisco	CA	94122
Watrous, Amy	Columbia	MO	65201
Steed, Denise	Phoenix	AZ	85018
Olsen, Diana	Hackettstown	NJ	7840
Olivarez, Aurelio	Waco	TX	76711
Kenna, Aaron	La Mesa	CA	91942
LaPenotiere, Molly	Morrison	FL	32668
Maish, Sally	Roseburg	OR	97471
Rockwell, David	Placitas	NM	87043
Donnelly, Melinda	Medford	OR	97504
Foster, Judith	Greensboro	NC	27455
Bowlby, Mary	Farmington	NM	87402
Novick, Jeanie	Albuquerque	NM	87112
Gelfand, Bette	Loveland	CO	80537
Brown, Patricia	Kingman	AZ	86402
Hatcher, Cheryl	Marietta	GA	30064
Anderson, Ebbe	Seymour	TN	37865
Feinman, Chantie	Tempe	AZ	85282
McDonald, Nancy	San Dimas	CA	91773
Collins, Karen	Tampa	FL	33607
McCourt, Margaret	Philadelphia	PA	19128
Zimmermann, Debi	Boulder	CO	80302

Porter, Susan	Pasadena	CA	91103
Garbrick, Kathe	Manhattan	KS	66503
Benton, Annette	Pittsburg	CA	94565
Gibson, James	Loveland	CO	80537
Lynn, Dawn	Cheyenne	WY	82001
Herbert, Jan	Windsor	CA	95492
Roberts, Fiona	Las Vegas	NV	89135
Moody, Barbara Moody	Doraville	GA	30340
Grabsch, Dagmar	St Augustine	FL	32084
Eley, Patricia	Meadow Vista	CA	95722
Bornscheuer, Sue	Douglasville	GA	30135
Van Alyne, Emily	West Richland	WA	99353
Andric, Eileen	Lisbon	OH	44432
Jouppi, Diane	Albuquerque	NM	87120
Clifton, Janis	Lexington Park	MD	20653
Juric, Eileen	Raleigh	NC	27605
Smith, Sheila	Green Valley	AZ	85622
Vendetti, Pamels	Peoria	AZ	85383
Ress, Denise	Ravenna	OH	44266
Beemer, Chris	Milford	KS	66514
Alley, Diane	Santa Fe	NM	87505
Berliner, Diane	Los Angeles	CA	90046
Wolford, Deborah	Waddell	AZ	85355
Aprile, Kathy Aprile	Califon	NJ	7830
Chambers, Carol	Nashville	TN	37205
Brown, Dianne	Clyde	NC	28721
Watkins, Debbie	Lebanon	OR	97355
Bozhko, Natalia	Denver	CO	80205
Gleason, Sherry	Grand Junction	CO	81502
Stone, Johanna	Kailua	HI	96734
Derby, Kim	Pacific Palisades	CA	90272
Riggs, Kristin	Sacramento	CA	95819
West, Robin	Downingtown	PA	19335
Smart, Murray	Beardsley	MN	56211
Cummings, Patricia	Clawson	MI	48017
Cremin, Bernie	Collinsville	OK	74021
Giacomazzo, Carole	Rockford	IL	61108
Wickham, Joan	Pasadena	CA	91107
Linder, Patty	San Jose	CA	95136
Buck, Shelby	Fort Walton Beach	FL	32547

Russell, Diane	Green Valley	AZ	85622
Padilla, Pat	Porterville	CA	93257
King, Kari Sue	Canajoharie	NY	13317
Cook, Debra	Clovis	NM	88101
Nieto, Eujenia	Santa Clara	CA	95051
Spencer, Carole	Midlothian	IL	60445
Chapman, Michael	Atlanta	GA	30306
Beaubien, Keeta	Interlochen	MI	49643
Ramakrishnan, Ananthanarayanan	Antioch	IL	60002
Brumleve, Charles	Manhattan	KS	66502
Clement, Cindy	Middletown	RI	2842
Lanka, Mike	Maricopa	AZ	85138
Geltman, Richard	Potomac	MD	20854
Gregory, Marilyn	White City	OR	97503
Hauschild, Carol	Garden City	KS	67846
Hanenburg, Sue	Stacy	MN	55079
Sovola, Dr. Shelley	Brookings	OR	97415
Forssell, Lynn	Vacaville	CA	95688
Douglas, Terrie	Vina	CA	96092
Perry, Janna	Romayor	TX	77368
Hoerig, Gudrun	Santa Fe	NM	87505
Moore, Rosanne	Sarasota	FL	34234
Rains, Cynthia A.	Archdale	NC	27263
Lambott, Rick	Maylene	AL	35114
Hall, Eustacia	Manteca	CA	95337
Rice, Debbie	Jurupa Valley	CA	91752
Basalaj, Julie	Keystone	SD	57751
Weseman, Lisa	Portland	OR	97233
Suzuki, Sueli	Peoria	AZ	85383
Calhoun, Pamela	Elk Grove	CA	95758
Arnold, Rebecca	Tabernash	CO	80478
Thraillkill, James	Longmont	CO	80501
Ostoich, Julie	Sacramento	CA	95826
Ramaglino, Harriet	Goodyear	AZ	85338
Dorio, Julie	Mammoth Lakes	CA	93546
Minsky, Nina	Allyn	WA	98524
Sharpe, Susan	Ocean Springs	MS	39564
Wobus, Elizabeth	Rough And Ready	CA	95975
Jefferys, Cindy	Thorndale	TX	76577
Cochrane, Barbara	Chicago	IL	60628

McKinney, Cathy	Kingston Springs	TN	37082
Ryan, Diane	Lakewood	NJ	8701
Goppert, Donald	Canastota	NY	13032
Butler, Pamela	Mill Valley	CA	94941
Rutherford, Stephanie	Phoenix	AZ	85008
De Coster, Donna	Brooksville	FL	34613
Tanaka, Janice	Los Angeles	CA	90024
Sem, Teresa	Portland	OR	97229
Brigati, Vicki A	Apple Valley	MN	55124
Hensley, Patricia	Dallas	TX	75252
Ezemoli, Kathleen	Littleton	CO	80123
D'Errico, Mary	Murrells Inlet	SC	29576
Klar, Linda	Austin	TX	78748
Beauchene, Kate	Santa Monica	CA	90405
Rodriguez, Norma	Bellflower	CA	90706
Lopez, Maryrose	Cameron Park	CA	95682
Cardlin, Dorothy	Yardley	PA	19067
Falcon, Ruth Neuwald	Seattle	WA	98125
Hodges, Connie	Irving	TX	75063
Hicks, Teresa	Rapid City	SD	57701
Vn, Rehana	New Derry	PA	15671
Gould, Larry	Lincoln	CA	95648
Carlisle, Tonya	Caddo Mills	TX	75135
Valente, Suzanne	Pacifica	CA	94044
Mentes, Lisa	Bridgeport	CT	6605
Clark, Sherry	Indianapolis	IN	46234
Spotts, Robert	Oakley	CA	94561
Tildes, Katherine	West Yarmouth	MA	2673
Jacinto, Laura	Carson City	NV	89706
Callen, Jessica	Mountain View	CA	94043
Maerov, Lauri	Durham	NC	27713
Richardson, Susan	Modesto	CA	95350
Brennan, Gayle	Woodland Hills	CA	91367
R, Lynn	Fort Smith	AR	72903
Voss, Sabrina	Mesa	AZ	85208
Johnson, Nikki	Parma	ID	83660
DeBraal, Karen	Springfield	OR	97477
Lemming, Richard	Dayton	NV	89403
Moore, Patty	Columbus	OH	43205
Nelson, Tina	Omaha	NE	68116

Wilson, Tracy	Reno	NV	89521
Harris, Beth	Remington	VA	22734
E, Miriam	Puyallup	WA	98374
Newman, Anita	Pinellas Park	FL	33782
Buescher, Barbara	East Orange	NJ	7018
Walton, Elizabeth	Grand Junction	CO	81501
Miller, Marvin	Apache Junction	AZ	85119
Kohn, Lottie	Ossining	NY	10562
Hepp, Louise	West Bend	WI	53095
Ryan, Ann	Santa Monica	CA	90407
Sharp, Todd	Phoenix	AZ	85018
Faisal, Maria	Elmwood Park	IL	60707
A, M	Henrietta	NY	14467
Borchardt, Peg	Albuquerque	NM	87123
Maki, Lenamae	Laramie	WY	82072
Polesky, Alice	San Francisco	CA	94107
Tyler, Jeanne	Aurora	CO	80015
Vilonel, Sanette	Pretoria	MD	21568
Burkhart, Alice	Fort Worth	TX	76134
Becker, Bobbie	Lincolnshire	IL	60069
Hosford, Sharon	Chandler	AZ	85249
Congdon, Russell	West Columbia	SC	29169
Snow, Carol	Sacramento	CA	95824
Cameron, Kathy	Sandy	UT	84070
Tooley, Claudette	Aurora	IL	60505
Schoeder, Nicole	Golden	CO	80403
Brown, Marygrace Gerard	Mount Sinai	NY	11766
McCormack, Linda	Littlerock	CA	93543
K, Melissa	South Heights	PA	15081
Marisa, Sara	Gold Canyon	AZ	85118
DeWitz, David	Lakeside	CA	92040
Junek, Mary	Mukwonago	WI	53149
Caughlin, Lilian	Kingman	AZ	86402
Dunn, Debbie	Denver	CO	80222
Santto, Aldana	Oxford	NJ	7863
Langland, Rose Marie	Lyndon Station	WI	53944
Bledsoe, Trudy	Owensville	IN	47665
Montana, Melissa	Pueblo	CO	81004
Hess, Regula	Dixon	CA	95620
Javinsky, Elizabeth	Minneapolis	MN	55426

Smith, Vicki	Raymond	OH	43067
Clark, Patricia	Maple Valley	WA	98038
Hanna, Diana	Carmel	CA	93922
Shaughnessy, Anna	Geneva	OH	44041
Jacob, Karen	Napa	CA	94558
Shaughnessy, Robert	Geneva	OH	44041
Corry, Jennifer	Lynn Haven	FL	32444
Bailey, Barb	Middlefield	OH	44062
Gardner, Pam	Gilbert	AZ	85234
Laughlin, Chris	Liberty	NC	27298
Fields, Shirley	Las Vegas	NV	89122
Paskiet, Clare	Lockport	IL	60441
Sierra, Elizabeth	Nashville	TN	37208
Gibbs, Jerilyn	Savannah	GA	31411
Brewer, Michele	Flagstaff	AZ	86004
Daley, Karen	Surprise	AZ	85374
Cranmer, Pat	Saint Peters	MO	63376
Rogers, Debra	Nicasio	CA	94946
Cecil, Dechenne	Sheridan	WY	82801
Hundrieser, Pam	Queen Creek	AZ	85142
Gehring, Patricia	Billings	MT	59102
Voci, Linda	Redmond	OR	97756
Welch, Kathleen	Elko	NV	89801
Rosenbach, Sue	Bristol	CT	6010
Koontz, Mary	Baton Rouge	LA	70817
Ramirez, June	Glendale	AZ	85308
Seng, Sue	Davisburg	MI	48350
Brinson, Karen	Downsville	LA	71234
Phillips Margulis, Elise	Livingston	NJ	7039
Tabone, Terrie	Campbell	CA	95008
Kurtz, Maya	Glenwood Springs	CO	81601
Monteiller, Helene	Memphis	TN	38122
Garrison, Anita	Prescott	AZ	86303
Castillo, Rita	Springfield	OR	97478
Brooks-Fetty, Cynthia	Leoti	KS	67861
Kyle, Sally	Hainesport	NJ	8036
Woppert, Jean	Verona	WI	53593
Bird, Rolaine	West Jordan	UT	84084
Stoddard, Kris	Spring Green	WI	53588
Carroll, Mark	San Diego	CA	92103

Rinaldi, Kt	Seattle	WA	98103
McCain, Betty	Grand Junction	CO	81505
Pringle, Leslie	Windsor	CA	95492
Miller, Elaine	Batavia	OH	45103
Simpson, Edith	Wynantskill	NY	12198
McMahon, Terrill	Santa Cruz	CA	95062
Ford, Phyllis	Martinez	CA	94553
Tuttle, Will	Hidden Valley Lake	CA	95467
Fiste, Roxie	Vandalia	OH	45377
Betcher, Susan	Peoria	AZ	85345
Fisher, Sandra	Allegan	MI	49010
Virzi, Patricia	Jurupa Valley	CA	92509
Smith, Sandra	Seattle	WA	98125
Kaslander, Carol	Lawrence Township	NJ	8648
Shinski, Debbie	Kanab	UT	84741
Fast, Phyllis	Gillette	NJ	7933
Timmers, Liza	Clear Lake	MN	55319
Delpino, Rosemary	Baden	PA	15005
Salomon, Ximena	Chicago	IL	60657
Schadewitz, Bob-Linda	Canby	OR	97013
	Cottonwood		
Winter, Elaine	Heights	UT	84121
Nipper, Elizabeth	Poplar Bluff	MO	63902
Sullivan, Ann	Lakeside	CA	92040
Wilson, Margo	Phoenix	AZ	85022
Wallace, Elizabeth	Poway	CA	92064
LaSchiava, Dona	Green Valley	AZ	85614
Farley, Barry	Baltimore	MD	21211
Anderson, Barbara	Sacramento	CA	95829
Carsten, R	Saint Louis	MO	63119
Delgado, John	San Martin	CA	95046
Simek, Stephanie	Southfield	MI	48033
Maisonnette, Sylvie	Mornant	AK	69440
Canright, Rebecca	Asbury	NJ	8802
Canright, Mark	Asbury	NJ	8802
Hansen, Amy	Rockport	WA	98283
Gustafson, Kerry	Lake Havasu City	AZ	86406
Torosian, Michael	Fredericksburg	VA	22405
Torosian, Helen	Fredericksburg	VA	22405
Hall, Liz	Show Low	AZ	85901

Altaffer, Jeff	Hurricane	UT	84737
Tindall, Christine	Detroit	MI	48208
Zimmer, Linda	Ann Arbor	MI	48105
McDaniel, Darlin	Fayetteville	PA	17222
Sarlis, Sioux	Cool	CA	95614
O'Malley, Polly	Los Angeles	CA	90025
Gadwood, Judy	Castaic	CA	91384
Roller, Gayle	Sun City	CA	92587
Billings, Alice	Ridgway	CO	81432
Sheeler, Pam	Loveland	CO	80538
Billings, Alice	Ridgway	CO	81432
Conradie, Zelda	Huston	TX	77006
Kravcov Malcolm, Karen	Scottsdale	AZ	85262
O'Hare, William	Loves Park	IL	61111
Zepeda, Esther	Los Angeles	CA	90026
Gatchel, Bonny	Grandview	TX	76050
De Poorter, Jocelyne	France	AL	42000
Beaudin, Denise	Racine	WI	53404
Santistevan, Vickie	Ignacio	CO	81137
Sewall, Dana	Gresham	OR	97030
Branham, Barbara	Portland	OR	97225
G, C	San Diego	CA	92122
Blank, Gail	Oakhurst	CA	93644
Amick, Catherine	Palm Desert	CA	92260
Lewis, Sherry	Woodstock	GA	30188
Gould, Pat	Las Vegas	NV	89104
Williams, Nalan	Satellite Beach	FL	32937
Hurley Redeye, Crystal	Grand Junction	CO	81502
Sch^nhofer, Ramona	Concord	CA	94518
Barnett, Lisa	Farmington	AR	72730
Recca, Frances	Netcong	NJ	7857
Zelasko, Sandy	Valley Center	CA	92082
Henderson, Elaine	Portland	OR	97211
Hazynski, Chris	Burlington	NJ	8016
Wollum, Heidi	New York	NY	10004
Crider, Sandra	Burien	WA	98148
Douglas, Dianne	Phoenix	AZ	85042
Padelford, Grace	Kirkland	WA	98034
Armenta, Elizabeth	Grass Valley	CA	95949
Winholtz, Betty	Morro Bay	CA	93442

Alberts, Chantel	Arvada	CO	80001
R, D	San Diego	CA	92122
Turner, Bernadine	Newberry	FL	32669
Shadle, Linda	Anaheim	CA	92804
Fowler, Elena	Palm Desert	CA	92260
Zweig, Kristina	Pacheco	CA	94553
Ensign, Pamela	Tucson	AZ	85718
Geidel, Trish	San Pedro	CA	90731
Bernstein, Abbie	West Hollywood	CA	90069
Hewitt, Carol	Signal Hill	CA	90755
Singer, Ilse	New York	NY	10030
Singer, Ilse	New York	NY	10030
White, Cynthia	Arabi	GA	31712
Stephan, Dorothea	San Leandro	CA	94577
Almeida, Elizaabeth	Gambrills	MD	21054
Hinote, Suzie	Navarre	FL	32566
White, John	Schenectady	NY	12345
Miller, Wayne	Falkville	AL	35622
Genet, Mark	Hawesville	KY	42348
Herbert, William	Box Elder	SD	57719
Rushworth, Jerily	Colorado Springs	CO	80905
Caputo, Lisa	Manorville	NY	11949
Davis, Susan	Pompton Lakes	NJ	7442
Houtzagers, Violet	Atkinson	NE	68713
Culpepper, Jann	Fort Valley	GA	31030
Ranweiler, Patty	Mesa	AZ	85205
Tate, Lisa	Wichita Falls	TX	76310
Dillon, Sue	Wrightsville	PA	17368
Guerin, Carole	Plymouth	MA	2360
Gentry, Carla	Midland	TX	79705
Hallstrom, Nadja	Brooklyn	NY	11215
Carpenter, Mary Lynne	Sheridan	IN	46069
Conrich, Bob	Fort Lauderdale	FL	33315
Hinson, Katherine	Gilbert	AZ	85295
Fields, Jo	Anchorage	AK	99517
Johnson, Katherine	Howell	MI	48843
Faigin, Cecelia	Granada Hills	CA	91344
Howard, Nancy	Douglasville	GA	30135
Ohara, Debra	Evans Mills	NY	13637
Bryan, June	Burnsville	NC	28714

Chalson, Adriana	Wallingford	PA	19086
Atkins, Peggy	Asheville	NC	28803
Sefscik, Sue	Dunnellon	FL	34431
Carman, Judy	South Salem	OH	45681
Essman, John	Healdsburg	CA	95448
Posten, Rick	Los Angeles	CA	90049
Ledford, Peggy	Thomaston	GA	30286
Payne, Don	Alvarado	TX	76009
McIntyre, Gail	New York	NY	10019
King, Gillian	Sartrouville	AL	78500
Ransford, Patricia	Naples	FL	34116
Kraus, Marion	Heidenheim	OT	89522
Hughes, Haley	Essex	MA	1929
Boone, Barbara	Ketchum	ID	83340
Beatty, Janet Lee	San Luis Obispo	CA	93401
Petets, Clifford	Walpole	NH	3608
Fullerton, Carla	Graham	TX	76450
Soares, Maria	Lisboa	OT	1750
Eberhardt, Carleen	Port Orange	FL	32129
Franza, Estelle	Mainsat	OT	23700
Hollinger, Sallie	Camarillo	CA	93010
Mastri, Francis	Monroe	CT	6468
Devlin, Summer	Merritt Island	FL	32953
McConville, Cristen	Port Edwards	WI	54469
Owen, Lori	Sun City	AZ	85351
Canty, Ken	Dudley	MA	1571
Mills, Shirley	Sandwell	AL	56897
Meekins, Jamie	Maysville	NC	28555
Andres, Susette	Eckernf^rde	Not provided	
Berman, Kimberly	Rumney	NH	3266
Conroy, Peggy	West Chazy	NY	12992
Roberts, Lynn	Greensburg	IN	47240
C, Lynn	Rochester	NY	14617
O'Sullivan, Kathleen	Bumpass	VA	23024
Smith, Gayle	Carmel	CA	93923
MacCrimble, Christine	Kansasville	WI	53139
Rolf-Jansen, Bellinda	Oosterbeek	KY	0
Mitu, Camelia	Hampden	ME	4444
Brown, Tricia	Harrisburg	AR	72432
Lee, Tracey	Shadow Hills	CA	91040

Caswell, Gail	San Francisco	CA	94109
Boyle, Katie	Woodbridge	CT	6525
Hagopian, Darlene	Milwaukee	WI	53212
Mattice, Gregory	Toledo	OH	43623
Cavallo, Janet	Secane	PA	19018
Moore, Gina	Wyoming	MI	49509
Somarriba, Xiomara	Evansville	IN	47715
Shalaew, Steve	Ocala	FL	34474
Fischer, Karla	North Baldwin	NY	11510
Kern, Robin	Baldwin City	KS	66006
Sellers, Robin	Springwater	NY	14560
Crooks, Laurel	Marshall	VA	20115
Zimmerman, Nancy	Westbrook	ME	4092
Mucci, Debra	Middletown	NY	10940
Gaudet, Kathleen	Portland	CT	6480
Mackiewicz, Frances	Beachwood	NJ	8722
Loughlin, Mary Anne	Canton	NC	28716
Swank, Sharon	Connellsville	PA	15425
Frey, Alexandra	High Point	NC	27265
Wilkinson, Gina	Oak Forest	IL	60452
Beall, Lois	Phoenix	AZ	85022
Hurschik, Kimberly	Plainfield	IL	60586
McAfee, Nico	Belvedere Tiburon	CA	94920
Young, Bk	Loxahatchee	FL	33470
Cramblett, Dana	Hurricane	UT	84737
Fisher, Doris	Green Bay	WI	54313
Shalaew, Barbara	Ocala	FL	34474
Ghosh, Sudeshna	Jefferson	LA	70121
Roill, Deborah	Lockport	NY	14094
Alfeo, Anne	Port Aransas	TX	78373
Smith, Cynthia	Brant	MI	48614
Sadowski, Nicole	Jacksonville	FL	32259
Brown, Kimberly	Arnold	MO	63010
Battis, Stephen	Middleboro	MA	2346
Castillo, Kristine	Los Alamos	CA	93440
Pels, Tamara	Loveland	OH	45140
Denis, Laurie	Salem	MA	1970
Black Reid, Nina	Washington	DC	20007
Doughty, Cynthia	Mashpee	MA	2649
Arsan, Pat	Brookfield	CT	6804

Alexander, Joyce	Edinburgh	AL	11111
James, Cheryl	Dover	DE	19904
Kyler, Joan	Lancaster	PA	17603
Rosenkrantz, Gloria	Lavista	NE	68128
Rousso, Nada	Commack	NY	11725
Voss, Cheryl	Wanatah	IN	46390
Barrett, Bevin	Houston	TX	77025
Thrasher, Carla	Moore	OK	73160
Bruce, Gena	Duncan	SC	29334
Hull, Cynthia	Gallup	NM	87301
Smith, Bob	Show Low	AZ	85901
Noomie, Reneee	Troy	MI	48085
Newkirk, Lisa	Arvada	CO	80007
Van De Waarsenburg, Marc	Zierikzee	NY	0
Hayes, Jennifer	Chicago	IL	60625
Peebles, Patty	Bastrop	TX	78602
Peebles, Patty	Bastrop	TX	78602
Egan, Ronnie	Chesapeake Beach	MD	20732
Bollow, Elizabeth	Springboro	OH	45066
Smith, Bob	Show Low	AZ	85901
Hacha, Robbie	New York	NY	10009
Wyse, Margo	Mimbres	NM	88049
Keefe, Kristen	Fayetteville	NY	13066
Riedler, Monica	Washington	DC	20015
Lloyd, Kelly	Golden	CO	80403
Moy, Gene	Grosse Pointe	MI	48230
Witschey, Jennifer	New Martinsville	WV	26155
Chapin, Deborah	Garland	TX	75040
Poulsen, Claire	Christiansted	VI	820
Bellemare, Renee	Bass Harbor	ME	4653
Reader, Barbara	Cedar Springs	MI	49319
McCaslin, Lorna	Hinckley	OH	44233
Wilson, Bill	Apex	NC	27502
Evans, Jeannie	Bothell	WA	98012
Gaul, Mary	Worthington	IA	52078
Clark, Irina	San Diego	CA	92150
Reynolds, Debra	Gadsden	AL	35904
Moock, Erin	Ridgeville	SC	29472
Burns, Susan	Colorado Springs	CO	80904
Cunningham, Carol	Fountain Hills	AZ	85268

Rivenburg, Janice	Webster	NY	14580
Bitan, Sally	Falmouth	ME	4105
Zasadni, Jessica	Dillsburg	PA	17019
Holpert, Nancy	Starlight	PA	18461
Blancato, Nadine	Huntersville	NC	28078
Euripides, V.	Oakland	NJ	7436
Meecham, Jemma	Citrus Hts	CA	95610
Obrien, Victoria	Ridgewood	NY	11385
Lurie, Ilene	Brooklyn	NY	11230
Knight, Linda	Kenwood	CA	95452
Kadlec, Kenneth	Dover	DE	19901
Lewis, Kellie	Pagosa Springs	CO	81147
Bourque, Claudia	Pelham	NH	3076
McRae, Nancy	Pepperell	MA	1463
Wilmoth, Pamela	Bean Station	TN	37708
Ming, Martha	Cedar City	UT	84721
Griffin, Margaret	Stow	OH	44224
Perelli, Martha	Raleigh	NC	27614
Galligan, Kathleen	Bridgewater	NJ	8807
Forrest, Joni	Florence	AZ	85132
Brusco, Jodi	Santa Rosa	CA	95404
Martin, Robin	Tallahassee	FL	32308
Alverson, Denise	Danville	VA	24540
Lee, Dawn	Louisville	KY	40241
Rieger, Tanja	Coleman Falls	VA	24536
Waltasti, Marilyn	Maricopa	AZ	85138
Jauch, Kristina	Wittmann	AZ	85361
Frantz, Colette	Northumberland	PA	17857
SÈvilla, Caroline	Schenectady	NY	12345
Adams, Joan	Windham	CT	6280
Edwards, Stephanie	Edmonds	WA	98020
	Cape May Court		
Ryan, Larry	House	NJ	8210
Conroy, Peggy	West Chazy	NY	12992
Kennedy, Rachel	Beverly Hills	CA	90210
Dugan, Emily	Cocoa Beach	FL	32931
Arnal, Diane	St George	UT	84790
McFadden, Pamela	Phillipsburg	NJ	8865
Cyran, Elizabeth	Hardwick	MA	1082
Ratcliffe, Stephanie	Hamlin	NY	14464

Kirby, Lola	Moorhead	MN	56560
Fletcher, Cassie	Devon	MH	86295
Bodfish, John	East Hartford	CT	6108
Fee, Audrey	Shelton	CT	6484
Marston, Pam	Harvard	MA	1451
Jones, J	Chantilly	VA	20152
Just, Leslie	Buffalo	NY	14224
Osborn, Annalyn	Sandy	UT	84094
Leslie, Kathy	Key West	FL	33040
Totty, Mary	Monroe	VA	24574
Dwyer, Sylvia	Weare	NH	3281
Lancman, Deborah	La Mesa	CA	91941
Gilliland, Linnea	Madison	TN	37115
Burek, Sue	Palos Park	IL	60464
Stanislawsky, Maryann	Jonesborough	TN	37659
Phillippi, Neysa	Indiana	PA	15701
M, L	Wakefield	MA	1880
Campbell, Kristin	Waconia	MN	55387
Lukowski, Mary	Porterfield	WI	54159
Lundberg, Lori	Scottsdale	AZ	85255
Heron, Kathleen	Annapolis	MD	21409
Lopez, I M	San Diego	CA	92110
Strohmeier, April	Mauston	WI	53948
Bryan, Kay	Houston	TX	77056
Morris, Carol	Canal Winchester	OH	43110
Norris, Sandra	Cedartown	GA	30125
Cogar, Nicki	Clinton	MI	49236
Pitkin, Katherine	South Wales	NY	14139
Runyon, Marit	Apache Junction	AZ	85119
Corkett, Annmarie	Richmond Hill	NY	11418
Jenkins, Teresa	Annapolis	MD	21403
Elrod, Dorothy	North East	MD	21901
Daniel, Wendy	Irvine	CA	92614
Jordan, Kimberly	Cary	NC	27513
Delaney, Patricia	Ocean	NJ	7712
Wright, Laurie	Brightwood	VA	22715
Bryson, Larry	Scottsdale	AZ	85255
Bryson, Catherine	Scottsdale	AZ	85255
Sampson, Beth	Franklin	MA	2038
Williams, Terrie	Vidor	TX	77662

Hendrixson, Abigail	Temple	NH	3084
Kokolis, Katerina	Columbia	SC	29212
Kokolis, Constantine	Columbia	SC	29212
Kokolis, John	Columbia	SC	29212
Stahl, Lisa	Broken Arrow	OK	74014
Collier-Chambers, Vicki	Bloomfield	IN	47424
Kaechele, Lee	Cave Creek	AZ	85331
Blackburn, Catherine	Montrose	MN	55363
Gutierrez, Mary	Pensacola	FL	32503
Wallace, Louise	Fairfax	VA	22031
Bailey, Helen	McKinney	TX	75072
Puca, Robert	Brooklyn	NY	11217
Puc, Rob	Brooklyn	NY	11217
Camarillo, Suzanne Marcella	Los Angeles	CA	90069
Bryan, K.	Houston	TX	77005
Sollitto, Alissa	Endicott	NY	13760
Morrison, Kelly	Andover	MN	55304
Dryer, Sandy	Jackson	MO	63755
Yancey, Bob	Sorento	IL	62086
Scott, Shelly	Florence	KY	41042
Reid, Nancy	Poway	CA	92064
Garcia, Rene	Nobleton	FL	34661
Pappano, Rachael	Mattawamkeag	ME	4459
Farrell, Wendy	Davisburg	MI	48350
Diederiks, Nichole	Kentwood	MI	49548
Rager, Melissa	Kempton	IN	46049
Kopteros, Michelle	Chicago	IL	60626
Wahlberg, Peggy	Bethel	CT	6801
Vanwymelbeke, Chantal	Grosse Pointe	MI	48230
Hibbs, Toya	Clarkrange	TN	38553
Gunnar, Margaret	Brookfield	IL	60513
Cross, Todd	Yardley	PA	19067
Murphy, Charlotte	Phoenix	AZ	85019
Brown, Aleasha	Jackson	CA	95642
Hacker, Andrea	Federal Way	WA	98003
Kramer, Judith	Scottsdale	AZ	85260
DeLuca, Theresa	Melrose	MA	2176
Jenson, Kathy	Hilton Head Island	SC	29926
Tibshraeny, Mike	Chandler	AZ	85286
Satre, Michele	Anaheim	CA	92804

Schultz, Marilyn	Anchorage	AK	99508
Myatt, Marla	Aliso Viejo	CA	92656
Hubbell, Karen	Northfield	CT	6778
Vest, Peggy	Fort Myers	FL	33907
Spiridon, May	Saint Petersburg	FL	33710
Ashton, Debra	Hoboken	NJ	7030
Yedinak, Bonnie	Peoria	IL	61614
Burke, Russell	Guerneville	CA	95446
Carlson, Linda	Veneta	OR	97487
Wagner, Kathleen	Tempe	AZ	85282
Gonzales, Antoinette	Victorville	CA	92394
Puckett, Terry	Red Bluff	CA	96080
Conley, Linda	Wellsburg	WV	26070
Nelson, Sandi	Beaverdam	VA	23015
Shields, Jamie	Portland	OR	97229
Caldwell, Jill	Golden	CO	80401
Harrison, Julie	Rockledge	FL	32955
McClintock, Vickie	Edwardsville	IL	62025
Barnard, Dianne	Tucson	AZ	85739
Martinez, James	Minden	NV	89423
Schnebelen, Robin	Villa Ridge	MO	63089
Lane, Judy	Schaumburg	IL	60194
Bowden, Ann	Sandwich	MA	2563
Miller, Laura	Manistee	MI	49660
Pasqualini, Jude	Candler	NC	28715
Ward, Pat	Portland	OR	97203
Clukey, Charlene	Wells	ME	4090
Harrison, Jennifer	Bristol	VA	24201
N, Michelle	Glen Allen	VA	23058
Quigley, Barbara	Rutherford	NJ	7070
Bell, Anita	Hastings	OK	73548
Feit, Lisa	Gaithersburg	MD	20882
Arnold, Stephen	Scottsdale	AZ	85254
Werts, Melissa	Dayton	OH	45403
Firestone, Linda	Port Orford	OR	97465
Collins, Claudia	Mount Olive	IL	62069
Warll, Juli-Anne	Park City	UT	84098
Gore, Robert	Maryland Heights	MO	63043
Black, Viki	Williamsville	IL	62693
Casale, Terri	Loretto	PA	15940

Page, Loney	Johnstown	NY	12095
Humphrey, Matthew	Baltimore	MD	21218
Barker, Donna	Gunnison	CO	81230
Hanson, Christine	San Francisco	CA	94112
Dunaway, Michaela	Waco	TX	76703
Arreaga, Marianne M	Los Angeles	CA	90046
Parrilli, Debra	Scottsdale	AZ	85260
Dellaratta, Rosalie	Gates Mills	OH	44040
Williamon, Toni	Rockmart	GA	30153
Lingo, George III	Pueblo West	CO	81007
Harpe, Tracy	Keystone Heights	FL	32656
Miller, Larry L.	Akron	OH	44312
Drake, Janice	Calabasas	CA	91302
Juliano, Linda	Winsted	CT	6063
Ahlstrand, Heidi Lynn	Owatonna	MN	55060
Spangler, Paula	Chico	CA	95973
Bok, Nancy	Sherwood	OH	43556
Anchors, Carla	West Palm Beach	FL	33420
Hutchin, Lisa	Wilton	CA	95693
Hughes, Don	Cedar Hill	TX	75104
Reed, Julie	Sarasota	FL	34240
Micek, Juraj	Rancho Cucamonga	CA	91701
Albiani, Adella	Penn Valley	CA	95946
Gough, Roseanne	Schenectady	NY	12345
Fronk, Dorothy	Catawissa	PA	17820
Moore, Angie	Springfield	MO	65802
Sang, Sara	North Hollywood	CA	91601
Kalavity, Karen	Westminster	CO	80021
Harguess, Angie	Belpre	OH	45714
Wilt, Becky	Phoenix	AZ	85048
Meyer, Debra	East Canton	OH	44730
Moore, Cherie	Livermore	CA	94551
Bloch, Nini	Bedford	MA	1730
Fine, Connie	Cicero	NY	13039
Thomas, Linda	Scottsdale	AZ	85258
Kalesnik, Tracy	Lester	PA	19029
Williams, Kathleen	Fort Lauderdale	FL	33314
Stark, Alex	Sun Lakes	AZ	85248
Scott, Christine	Novato	CA	94947
Rego, Gayle	Reno	NV	89523

Weiss, Nancy	Fountain Hills	AZ	85268
Jorgensen, Michelle	Chicago	IL	60640
Johnson, Pamela	Lake Village	IN	46349
Engdahl, Lisa	Chandler	AZ	85248
	Pennsylvania		
Witherite, Eleanor	Furnace	PA	16865
Martin, Angie	Mesa	AZ	85212
Jacobsen, Sharon	Loretto	MN	55357
Hendrick, Mona	Fredericksburg	VA	22408
Buttery, Rickey	Cocoa	FL	32927
Mueller, Lara	Monett	MO	65708
LaPolla, Charles	Katonah	NY	10536
Nunez, Adriana	Jersey City	NJ	7306
LaPolla, Charles	Katonah	NY	10536
Smith, Joan	Corsicana	TX	75110
Wakerley, William Norman	Colorado Springs	CO	80918
Childress, Wendy	State Road	NC	28676
Rogers, Roz	Deerfield	NH	3037
Husfelt, Melanie	Lewisville	NC	27023
Wood, Judy	Loveland	CO	80537
McHale, Cynthia	Naperville	IL	60540
Winkler, Amy	Columbus	GA	31909
Schroedel, Christine	Fountain Hills	AZ	85268
Stein, Ewa And Zbig	Port Charlotte	FL	33948
Olson, Karen	Renton	WA	98058
Siray, Barb	Frisco	CO	80443
Wyber, Darlene	Saint Clair Shores	MI	48081
Houbre, Amy	Plymouth	MA	2360
McElvogue, Jeanne	Coldspring	TX	77331
Fenley, Kathryn	Indianapolis	IN	46237
Cobb, Robert	Knoxville	TN	37934
Mulholland, Katie	Potomac	MD	20854
Martin, Michael	Edgewater	MD	21037
Laplante, Virginia	Canterbury	NH	3224
Anning, Alicia	Sault Sainte Marie	MI	49783
Larson, Kristine	Kingwood	TX	77339
Muratore, Beth	Elverson	PA	19520
Kobiske, Joy	Fremont	WI	54940
Mangini, Gale	Westover	MD	21871
Podskubkova, Simona	Orlando	FL	32837

Laubach, Lynnda	Saint Paul	MN	55128
Walker, Louis Jr	Poughkeepsie	NY	12603
Hammond, Carol	Averill Park	NY	12018
Christian, Janet	Beavercreek	OH	45430
Guertin, Joseph	Cincinnati	OH	45244
Pooler, Carole	Chicago	IL	60625
Roberson, Tamela	Everett	WA	98203
Bigelow, Valerie	Helena	MT	59602
Cameron, Jean	College Station	TX	77845
Quillin, Dawn	Zephyr Cove	NV	89448
Cawley, Joanne	Waterford	CT	6385
Jessler, Darynne	Valley Village	CA	91607
Owen, Debbie	Lake Villa	IL	60046
Sreiber, Andrea	Schenectady	NY	12304
Mehs, Lisa	Waukesha	WI	53188
Welch, Michele	Phoenix	AZ	85080
Wayburn, Diana	Jackson Heights	NY	11372
Britner, Mary Jo	Hagerstown	MD	21740
Bensen, Tiffany	Oxford	MS	38655
Morrison, Sue	Austin	TX	78757
Benton, Mary	Tucson	AZ	85710
Velthoen, Rebecca	Estes Park	CO	80517
Myers, Diane	Tucson	AZ	85714
Jones, Mitzi	Cedar Park	TX	78613
Nowicki, Kathleen	Eddyville	KY	42038
Carpenter, Sharon	Walnut	CA	91789
K, Lee	Clayton	DE	19938
Wolzen, Roxane	Holdrege	NE	68949
Pask, Gene	Colorado Springs	CO	80904
Singer, Sarah	Dekalb	IL	60115
Macias, Gina	Henrico	VA	23294
Glendrange, Kathryn	Redlands	CA	92373
McHugh, Heather	Oakland	CA	94611
Perrigoue, Linda	Redington Beach	FL	33708
Green, Jan	Paulden	AZ	86334
Ingle, Donna	Hampton	VA	23664
Gray, Judith	Millsboro	DE	19966
Spargo, Katie	Gilbert	AZ	85298
Traylor, Pamela	Mesa	AZ	85213
Dubovsky, Susan	Tawas City	MI	48763

Goshorn, Renee	Hillsdale	MI	49242
Newton, R.	Springfield	TN	37172
Lee, Marie	Effingham	SC	29541
Dauberman, Anita	Halifax	PA	17032
Hegedus, Barbara	Parkesburg	PA	19365
R, Heather	Long Beach	CA	90804
Watters, Whitney	St Augustine	FL	32084
Larsen, Carla	Cottonwood	AZ	86326
Blake, Gaylie	Alstead	NH	3602
Maher, Kenneth	Punta Gorda	FL	33955
Fenicle, Thomas	Pahrump	NV	89048
Caracci, Gina	Cocoa	FL	32926
Miller, Sherriey	Baldwinsville	NY	13027
Hedinger, Ann	Long Branch	NJ	7740
Wood, Patricia	Mc Coll	SC	29570
Marcus, Diane And Syd	Skokie	IL	60076
Kelso-Haines, Sue	Hood River	OR	97031
Spigarelli, Deborah	Venice	FL	34292
Freskos, Rosemary	Granbury	TX	76049
Cruze, Ethan	Bean Station	TN	37708
Hansen, A G	Crestwood	IL	60418
Staughton, Bonnie	Greenbelt	MD	20770
Hiner, Nancy	North Canton	OH	44720
Watters, Cheryl	Daytona Beach	FL	32114
De Leon, Mary	Joshua Tree	CA	92252
Charles, Stanley	Fort Mill	SC	29715
Miles, Marilyn	Buckley	WA	98321
Ridenour, Mary	Kent	OH	44240
Reid, Chris	Geneva	FL	32732
Riley, Callie	Citrus Heights	CA	95610
Riley, Laura	Citrus Heights	CA	95610
Barber, Astrata	Chesapeake	VA	23322
Schumacher, Brandy	Citrus Heights	CA	95610
Kuhn, Franklin	Granbury	TX	76049
Schalin, Amaryntha	Chesapeake	VA	23322
Lampman, Nora	Montour Falls	NY	14865
Van Cleave, Berinda	Battle Ground	WA	98604
Campbell, Cynthia Campbell	Glendora	CA	91740
Lapolla, Dayle	Katonah	NY	10536
Shaw, Bea	Flemington	NJ	8822

Greenwald, Ken	Santa Monica	CA	90404
Cypher, Melanie	Westcliffe	CO	81252
Hammond, Racheal	Sandown	NH	3873
Edwins, Sandra	Belvedere	SC	29841
McNatt, Mary	Saint Cloud	FL	34771
Stewart, Richard	Benicia	CA	94510
Brown, Debby	Punta Gorda	FL	33982
Steinhilber, Silvia	Mesa	AZ	85204
Beard, Dwayne	Hickory	NC	28602
Isaac, Tammy	Phoenix	AZ	85080
Hart, Charles	San Diego	CA	92199
Jacobsen, Jacque	Phoenix	AZ	85023
Baugh, Judy	Bandon	OR	97411
Austin, Jo	Seattle	WA	98117
Eck, Jj	Chandler	AZ	85286
Thurow, Joanne	Gilbert	AZ	85234
Carollo, Gina	San Diego	CA	92103
Murillo, Li	New York	NY	10012
Konczal, William	Buena Vista	CO	81211
Westfall, Marelyn	Mesa	AZ	85213
Downing, Steve	Santa Barbara	CA	93109
Carroll, Vickie	Fort Wayne	IN	46818
Wirth, Mark	Seattle	WA	98102
Ream, Sara	Conestoga	PA	17516
Espinoza, Debra	El Paso	TX	79936
Brinkley, Barbara	Jonesboro	AR	72401
Oliveira, O C	Providence	RI	2904
Robison, Patricia	Hutchinson	KS	67502
Foglietta, C	Arroyo Grande	CA	93420
Ullrick, Elizabeth	Phoenix	AZ	85032
Garcia, Krista	Houston	TX	77084
Wesley, Susan	Flagstaff	AZ	86001
McDonald, John	Newark	NJ	7105
Ryan, Diane	Green Valley	AZ	85622
Cooper, Ruth	Sparta	WI	54656
Gauthier, Marty	Crossville	TN	38558
Tolen, William	Covina	CA	91724
Pocholec, Sandra	Veneta	OR	97487
Snyder, April	San Marcos	CA	92069
Ashton, David	Hoboken	NJ	7030

Young, Beverly	Florissant	CO	80816
Moseley, Lance	Culver City	CA	90230
Cellurale, Linda	Lemont Furnace	PA	15456
Frank, Harriette	Durham	NC	27707
Clark, Victoria	Chandler	AZ	85248
Wiggin, Deborah	Stratham	NH	3885
St. John, Kathryn	Boulder Creek	CA	95006
Principe, Jeanne	New York	NY	10023
McDowell, Susan	Nashua	NH	3062
Essman, Carrie	Bidwell	OH	45614
Ellenwood, Laura	Montpelier	VT	5602
Williams, Emily	Francesville	IN	47946
Shaw, Barbara	Breckenridge	CO	80424
McBee, Cyndy	Tulsa	OK	74135
Standridge, Teri	Oliver Springs	TN	37840
Eunice, Elissa	Winter Park	FL	32789
Fischer, Claudia	Bayside	NY	35629
Garrison, Anita	Branford	FL	32008
Lindberg, Laurie	Carbondale	CO	81623
Montgomery, Ji	Shiremanstown	PA	17011
Newman, Terry	Maple Grove	MN	55311
Greenberg, Eileen	North Hollywood	CA	91606
Schou, J	Fort Worth	TX	76244
Pratt, Susan	Laguna Niguel	CA	92677
Kayser, Loretta	Charleston	OR	97420
Ivanova, Zara	Anchorage	AK	99501
LaBarge, Suzanne	Mill Valley	CA	94941
Peak, Robin	Tempe	AZ	85283
Herra, Ginger	Billings	MT	59102
Quarto, Faith	Mahopac	NY	10541
Clisson, Marjorie	Grand Champ	OT	56390
Van, Lana	Scottsdale	AZ	85254
H, J	Orting	WA	98360
T, F	Orting	WA	98360
Holbert, Ruthanne	Ashland	OR	97520
Steelhammer, Joan	Bend	OR	97701
Davis, Rebecca	Saegertown	PA	16433
Bartsch, Susan	Camden Wyoming	DE	19934
Fleisher, Cynthia	Saint Louis	MO	63128
Romano, Janet	Egg Harbor Twp	NJ	8234

Annecone, Lisa	Englewood	FL	34295
Malouin, Mary	Jacksonville	FL	32218
McCoy, Kathy	Andover	KS	67002
Doull, Sarah	Moraga	CA	94556
Laughlin, Mary	Plantation	FL	33322
Carter, Joe	Santa Fe	NM	87505
Kring, Juli	Houston	TX	77099
Brown, Ted	Mesa	AZ	85207
Smothers, Kathe	Anza	CA	92539
Reeves, Deborah	Salt Lake City	UT	84116
Heller, Christine	Lake Forest	IL	60045
Alm, Ylva Z	Hallandale	FL	33009
Chatfield, Nicholas	Virginia Beach	VA	23456
Brown, Corinne	Englewood	CO	80113
O'Leary, Nina	Indianapolis	IN	46220
Iacolino, Janet	Nashville	TN	37214
Klein, Janette	Santa Rosa Beach	FL	32459
Roberson, Sandra	Minden	NV	89423
Gumprecht, Carole	Oviedo	FL	32765
Irwin, Roger	Dallas	TX	75218
Murphy, Michelle	Trenton	NJ	8619
Nemeth, Linda	Round Lake Beach	IL	60073
Chrismer, Cynthia	Wellsville	PA	17365
McNamee, Marianne	Tucson	AZ	85718
Bradley, Donna	Brooklyn	NY	11234
Balding, Charity	Spring Creek	NV	89815
Polick, Melissa	Mill Valley	CA	94941
Sammet, Lisa	Scottsdale	AZ	85254
Fuller, Charles	La Center	WA	98629
Flowers, Rebecca	Louisville	KY	40241
Hansen, Julie	Freeman	SD	57029
Baldwin, Christina	Sturgis	MI	49091
Bushnell, Kay	Palo Alto	CA	94303
Baxley, Cindy	Plano	TX	75086
Falk, Darlene	Boone	NC	28607
Aldrich, Sharon	Centerville	IN	47330
Travis, Salie	Glendale	AZ	85308
Phillips, Joan	Grants Pass	OR	97526
Reeser, D	Reno	NV	89511
Solomon, Lois Solomon	Bristol	CT	6010

Couch, Sandra	Naperville	IL	60564
Moseley, Darlene	Broxton	GA	31519
Kozel, Susan	Stockbridge	GA	30281
Miller, Kathy	Topeka	KS	66605
Sch_mmer, Sue	Henderson	NV	89077
Antaya, Christine	Mesa	AZ	85206
Poole, Kathleen	Albuquerque	NM	87120
Turro, Kat	Edgewood	NM	87015
Campbell, Dorene	Vail	AZ	85641
Gerdts, Tamara	Reno	NV	89521
Roberts, Katharine	Coyote	NM	87012
Coursey, Cheri	Eugene	OR	97404
Cruz, Marian	Merced	CA	95348
Nenow, Marlys	Clermont	FL	34711
Staab, Diana	Naples	FL	34109
Spencer, Kelly	Bedford	IN	47421
Mathes, Barbara	Rio Rico	AZ	85648
Sapone, Diane	East Northport	NY	11731
Muller, Kayla	Saint Michael	MN	55376
Thomas, Sharon	Saint Michael	MN	55376
Loeffler, Diane	Spokane	WA	99205
Kilgore, Anne	Houston	TX	77009
Carlomagno, Cc	Santa Monica	CA	90403
Lapid, Kay	Tempe	AZ	85282
Shaffer, Nicole	Colorado Springs	CO	80917
Hopkins, Chantal	Aptos	CA	95003
Du Mont, Lyn	Golden	CO	80401
Spears Cooper, Carolyn	Crockett	TX	75835
Hutchinson, Dawn	Tacoma	WA	98403
Babcock, Susanne	Fort Myers	FL	33901
McGill, Bonnie	Conneaut Lake	PA	16316
Rider, Robin	Boise	ID	83713
Jirik, Lynette	Winfield	IL	60190
LaMonica, Trudy	Rescue	CA	95672
Corsello, Mike	Canton	GA	30115
Fiala, Ej	Louisville	CO	80027
Amos, Constance	Memphis	TN	38119
DeRusha, Julie	Madison	WI	53704
Pittluck, Denise	Lake In The Hills	IL	60156
Aschauer, Sharlene	Roseville	CA	95747

Smith, Marti	Newbury Park	CA	91320
Pruden, Patti Pruden	Olympia	WA	98506
Patoray, Arlene	Paramus	NJ	7652
Mueller, Christine	Portland	OR	97202
Schneeberger, Ann	Wellington	FL	33414
Miltner, Brooke	Pine	CO	80470
Casey, Jane	Vallejo	CA	94590
Browndog, Lila	Eugene	OR	97405
Smyth, John R	Dallas	GA	30157
DeMalio, Tony	Sicklerville	NJ	8081
Lawson, Sarah	Big Stone Gap	VA	24219
DeCarlo, Kandi	Riverside	CA	92506
Harris, Michelle	Venice	FL	34285
Collewyn, Alida	Fernley	NV	89408
Kitti, Donna	Greeley	CO	80634
Cleveland, Jill	Delavan	WI	53115
LaRiviere, Heather	Longview	WA	98632
Arter, Lisa Arter	Garden Grove	CA	90680
Krysa, Jacklyn	Austinburg	OH	44010
Paquin, Beverly	New Port Richey	FL	34654
Cordano, Rhonda	Sacramento	CA	95864
Rand, Helene	Scottsdale	AZ	85262
Engelby, Susan	Mankato	MN	56001
Erckmann, Lynn	Kirkland	WA	98033
Cunningham, Cathlene	Westfield	MA	1085
Hackett, Diann	Highland	NY	12528
Miller, Laura	Bethel Park	PA	15102
Vogel, Mari	Durham	NC	27713
Bullard, Ross	Boulder Creek	CA	95006
Cervantez, Paul	Tucson	AZ	85741
Bradley, Janis	Tallahassee	FL	32303
Bowley, Kat	Roswell	GA	30075
Ryan, Mary	Saint Louis	MO	63128
Stewart, Jeanni	La Quinta	CA	92253
Courts, Ian	Evergreen	CO	80439
Dupont, Susan	Roanoke	LA	70581
Reeves, Brian	Mesa	AZ	85208
Embry, Judith III	Florida	MA	1247
Lewis, Donna	Van Nuys	CA	91401
Avery, Micki	Georgetown	TX	78628

Olson, Sandra	Westborough	MA	1581
Wynne, Sheila	Berkley	MA	2779
Hirschhorn, V	Fairfield	IA	52556
Peirsol, Mary Ann	Weimar	TX	78962
Sandberg, Kirsten	Falls Mills	VA	24613
Toye, Dionne	Van Buren Twp	MI	48111
Igard, Jodi	Valley Village	CA	91607
Whitley, Sandra	Simpsonville	SC	29681
Trocha, Suzanne	Wickliffe	OH	44092
Rexses, Alyce	Clute	TX	77531
Howard, Laurie	Amarillo	TX	79124
Pielstick, Mary	Nampa	ID	83687
Menke, Peggy	Berger	MO	63014
Anne, Laura	Saint Petersburg	FL	33710
Flynn, Katarina	Elizabeth Lake	CA	93532
Fava, Roman	Thetford Center	VT	5075
Mitchell, Crystal	Bertram	TX	78605
Chastain, Elizabeth	Rock Spring	GA	30739
Johnson, Jennifer	Tempe	AZ	85283
Griffiths, Ruth	Schenectady	NY	12345
Krahn-Burke, Raianna	Ashland	NH	3217
Cole, Debi	Converse	TX	78109
Thompson, Dorothy	Slippery Rock	PA	16057
McDivitt, Tatiyana	Easton	PA	18045
Caulk, Linda	Orland Park	IL	60467
Caulk, Jim	Orland Park	IL	60467
Reinacher, Fiona	Palm City	FL	34990
Collingwood, Kimberly	Avondale	AZ	85323
Diener, Kathy	Monticello	IN	47960
Franklin, Constance	Los Angeles	CA	90026
Post, Sibyl	Lihue	HI	96766
Wilson, Kasey	Las Vegas	NV	89102
Cota, Nancy	Grand Junction	CO	81503
Sidebotham, Nancy	Oakland	CA	94605
Shideler, Valerie	Olivehurst	CA	95961
Moruzzi, Sandy	North Hollywood	CA	91606
Reid, Cathy	Round Lake	IL	60073
Garney, Maureen	Hephzibah	GA	30815
Caulk, Jim	Orland Park	IL	60467
McArthur, Rebecca	Freeport	FL	32439

Hursh, Gretchen	Colorado Springs	CO	80927
Murphy, Victoria	Grand Junction	CO	81507
Kenner, Kate	Guilford	VT	5301
Bordonaro, Patrice	Homestead	PA	15120
Benton, Pamela	Castle Rock	CO	80109
Dinucci, Pam	Wheaton	IL	60189
Demkowski, Carole	San Jose	CA	95125
Gould, Larry	Lincoln	CA	95648
Cuthers, Alice	Kingfisher	OK	73750
Anich, Julie	Apache Junction	AZ	85120
Choate, Pamela	Redford	MI	48239
Bakowski, Deb	Sarasota	FL	34241
Delcorpo, Kathleen	Branchville	NJ	7826
Allen, Debora	White House	TN	37188
Keefe, Kristen	Fayetteville	NY	13066
White, Tracy	Marietta	GA	30062
Carney, Marilyn	Wampum	PA	16157
Rickards, Sandra	Las Vegas	NV	89128
Morgan, Eva	Gold Canyon	AZ	85118
Pouliquen, Corinne Marie	Bethesda	MD	20816
Davis, Deana	West Brooklyn	IL	61378
Mitchell, Desiree	San Francisco	CA	94102
Rohn, Diane	McLean	VA	22101
Sieb, Angeline	Merrillville	IN	46410
Hall, Marilyn	Des Moines	IA	50311
Ventrelli, Joan	Villa Park	IL	60181
Dunford, Heather	Epsom	NH	3234
Jara, Laura	El Cajon	CA	92020
Schmink, Donna	Martinsville	IN	46151
Wootten, Joyce	Germantown	MD	20876
Brasswel, Kerry	Tucson	AZ	85743
Workman, Mary	Deland	FL	32720
Peterson, Susan	Janesville	WI	53548
Wood, Sue	Boynton Beach	FL	33472
Cardona, Kay	Bronx	NY	10462
Hubbard, Ron L.	Jasper	TN	37347
Yoder, Renee	Johnstown	PA	15906
Semeniuk, Naomi	New York	NY	10021
Brecht, Sally	Trenton	NJ	8620
Holloway, Gail	Placerville	CA	95667

Emmons, Virginia	Eatontown	NJ	7724
Riley, Patricia	Hastings	MN	55033
Smock, Franie	Luthersburg	PA	15848
Krager, Tina	Ida Grove	IA	51445
Kull, Erin	Pine Grove	PA	17963
Thomas, Georgia	Surprise	AZ	85374
McCartney, Teresa	Glen Allen	VA	23060
Ridenour, Rod	Draper	UT	84020
Vineski, Patricia	South Colton	NY	13687
Ridenour, Kat	Kenner	LA	70065
Denike, Susan	Lacey	WA	98503
Kelly, Allen	Sandy	UT	84094
Simpson, Kathy	Charlotte	NC	28210
Smith, David	Charlotte	NC	28205
Batway, Jewell	Apache Junction	AZ	85120
Hatch, Ben	Magna	UT	84044
Palmer, Jessica	Woodstock	IL	60098
Summerville, Deborah	Parkersburg	WV	26101
Bell, Jodi	Rancho Cucamonga	CA	91739
Ridenour, Pat	Draper	UT	84020
Velleman, Donna	Mastic Beach	NY	11951
Rogers, Joanne	West Des Moines	IA	50265
Atterbury, Elizabeth	Malvern	PA	19355
Dietrich, Andrea	Phoenix	AZ	85044
Paddock, Margaret	Cottonwood	AZ	86326
McCarel, Rosemary	Indianapolis	IN	46236
Phillips, Mindy	Murrieta	CA	92564
Fox, Linda	New Carlisle	OH	45344
Roepke, Jayne	Falls Church	VA	22043
Freedner, Camille	Valatie	NY	12184
Smith, Rhonda	Holly Hill	FL	32117
Clerke, Debbie	Lititz	PA	17543
S, M	Hamburg	NY	14075
Hersum, Terry	San Antonio	TX	78238
Hersum, Marian	San Antonio	TX	78238
Melnick, Vikki	Albuquerque	NM	87108
Stevens, Joyce	Denver	CO	80218
Summers, Keith	Summerfield	FL	34491
Fredrickson, Dixie	Phoenix	AZ	85019
South, Sandy South	Cincinnati	OH	45238

Logan, Jennifer	Sioux Falls	SD	57106
Phelps, Tami	Redding	CA	96003
Manitzas, Dee Anna	Boerne	TX	78015
Clyde, Kathleen	Cincinnati	OH	45251
Martone, Irene	North Arlington	NJ	7031
Jusko, Kristine	Godley	TX	76044
Troll, Janice	Olivet	MI	49076
Zucker, M. Lee	Eugene	OR	97403
Jacobson, Lisa	Tallahassee	FL	32304
Granato, Linda	Philadelphia	PA	19136
Roth, Ronna	Gainesville	GA	30506
Garrett, Georgia	Monterey	TN	38574
Manion, Michelene--Mychel	Port Orchard	WA	98366
Heine, Nancy	Eagle	WI	53119
Haworth, Judith	Eugene	OR	97405
Munson, Louise	Wyandotte	MI	48192
Bocca, Barbara	Redwood City	CA	94063
Hart, Virginia	Portland	OR	97223
Crisp, Stephanie	Laingsburg	MI	48848
Livesey-Fassel, Elaine	Los Angeles	CA	90064
Miller, Roxanne	The Woodlands	TX	77380
Jones, Kathrine	Pottsville	AR	72858
Mueller, Davi	De Pere	WI	54115
Mullane, Sharon	Los Angeles	CA	90066
Lewis, Erma	Brooklyn	NY	11204
Haskett, Linda	Cool	CA	95614
Garey, Gina	Portland	ME	4102
Petersen, Kim	Ludington	MI	49431
Colker, Lisa	Grafton	WI	53024
Bashaw, Jo	Saint George	UT	84790
King, Sandra	Longview	WA	98632
Link, C	Carpentersville	IL	60110
Williams, Karen	Murray	KY	42071
Trudeau, Priscilla	Cambridge	VT	5444
Sellers, Jennifer	Concord	CA	94521
Hevey, Gerard	Cambridge	VT	5444
Bellville, Bonny	Rochester	MN	55902
Wattman, Teckla	Wichita	KS	67203
Cort, Tracy	Snohomish	WA	98290
Smith, Marge	Nekoosa	WI	54457

Drozdyk, Carol	Ballston Spa	NY	12020
Wyatt, Mia	Ellicott City	MD	21043
Logan, Donna	Erie	PA	16506
Olson, Patricia	Mesa	AZ	85215
Golick, Jan	Eugene	OR	97405
Dale, Felicia	Tulalip	WA	98271
Poor, Rhonda	Sweetwater	TX	79556
Standridge, Lesley	High Springs	FL	32643
Grimson, Martha	Fairfield	CA	94534
Stockton, Tamalyn	Santa Rosa	CA	95401
Gabris, Dianne	Yacolt	WA	98675
Prost, Carol	Maynard	MA	1754
Glover, Melissa	Little Rock	AR	72210
Harris, Sharon	Wasilla	AK	99623
Henry, Grayson	Colmar	PA	18915
Buchanan, Linda	Meadview	AZ	86444
Walker, Deb	Gardnerville	NV	89410
Yermak, Iris Patty	Wilmington	DE	19809
Longo, Mia	Longmeadow	MA	1106
Hernandez, Lourdes	Hendersonville	NC	28792
Rakaczky, Rachel	Sparks	NV	89431
Alexander, Zsanine	Burbank	CA	91504
Moore, Angie	Springfield	MO	65802
Burke, Mary L	Tucson	AZ	85739
Holland, Andrea	Yukon	OK	73099
Krug, Catherine	Cornelius	NC	28031
Constand, Dana	Grosse Pointe	MI	48230
Kohn, Maria	Saint Clair Shores	MI	48080
Morrison, Colleen	Prospect Heights	IL	60070
Nelson, Lisa	Seymour	IN	47274
Johnson, Connie	Portland	OR	97221
Glyde, Jacqueline	Portland	OR	97220
Manske, Trisha	Green Valley	AZ	85614
Wilson, Penney	Van Horn	TX	79855
Moh, Susanne	Scottsdale	AZ	85260
Stinnett, Julie	Alpine	TX	79830
Hicks, Chastity	Lakeland	FL	33815
Walker, Virginia	Alpine	CA	91901
Elder, Melissa	Marysville	PA	17053
Metzler, Michelle	Lake Worth	FL	33467

Certosimo, Doris	Glendale	AZ	85302
Warner, Linda	Chiloquin	OR	97624
Stewart, Leslie	Andover	KS	67002
Abbey, Patricia A.	New London	NC	28127
L, Wanda	Billings	MT	59105
Ward, Victoria	Glendora	CA	91740
Baker, Shelley	Garland	TX	75044
Chastain, Vicky	Alpharetta	GA	30004
Lenahan, Margaret	Mountain Top	PA	18707
Rule, Laura	Bucyrus	OH	44820
Odom, Barbara	Dallas	TX	75230
Johnson, Nancy	Villisca	IA	50864
Marshall, Mona	Nichols	SC	29581
Hopkins, Sharon	Chandler	AZ	85224
Beckett, Colleen	Windsor	CA	95492
Bruhn, Patricia	Windsor	CT	6095
Lamprey, Audrey	La Verne	CA	91750
Nakagawa, Leslie	Philadelphia	PA	19107
Bailey, Robin	Hazel Green	AL	35750
Wheeler, Dorothy	Tucson	AZ	85746
Rohrbach, Sharon J.	Sandusky	OH	44870
Gubrud, Diane	Byron	IL	61010
Hackel, Joan	Wetumpka	AL	36093
McDonald, Barbara	Saint Paul	MN	55130
Bromley, L	Toronto	CA	11111
Pettus, Pam	Ferguson	MO	63135
Rogers, Judith	Coral	MI	49322
Levine, Tobey	Prescott	AZ	86303
Kent, Sharon	Tomball	TX	77377
Bernstein, Rachel	Saint Helens	OR	97051
Mueller, Susan	Wichita Falls	TX	76305
Justice, Kimberly	Rittman	OH	44270
Kiefer, Linda	Santa Barbara	CA	93105
Panarelli, Ron	Harrisville	RI	2830
Boyer, Suzanne	Mesa	AZ	85209
Oakes, Karen	Richardson	TX	75080
Schmauss Has, Marti	Longmont	CO	80504
Zub, Jane	Coconut Creek	FL	33066
Douma, Larry	Chino	CA	91710
Douma, Janice	Chino	CA	91710

Bergmann, Amy	Richmond	VA	23225
McCalla, Janice	Fountain Hills	AZ	85268
Worcester, Anne	Saint Louis	MO	63130
Wright, Elizabeth	Bonney Lake	WA	98391
Rose, Diann	San Francisco	CA	94109
Howard, Elizabeth	Mooreville	NC	28115
Leyva, Leann	Kennewick	WA	99337
Jenkins, Teresa	Miranda	CA	95553
Fischer, Susan	Walnut Creek	CA	94597
Uzonyi, Beth	Barstow	CA	92311
Rivera, Linda	Bronx	NY	10475
Babbitt, Susan	Philadelphia	PA	19107
Rivinius, Lisa	West Fargo	ND	58078
Sims, Kate	Wichita	KS	67216
Douglas, Dianne	Phoenix	AZ	85042
Darby, Kathleen	Hollywood	FL	33020
Coburn, Sylvia	Scottsdale	AZ	85262
Beers, Julie	Honolulu	HI	96826
Roya, Joan	Van Vleck	TX	77482
Mitchell-Shihabi, Jessica	Antelope	CA	95843
Johnson, Becky	Grants Pass	OR	97526
Bradford, Tammy	Kermit	TX	79745
Armati, Daphne	Warrenton	VA	20187
Griffin, Brenda	Suwanee	GA	30024
Moro, Tammy	Sierra Vista	AZ	85635
Quinn, Jean	Sun City	AZ	85373
Lange, Anja	Boulder	CO	80302
Perryman, Michelle	Phoenix	AZ	85032
Wager, Joan	Berkeley	CA	94708
Bruder, Judy	Haiku	HI	96708
Danon, Yolanda	Manhattan Beach	CA	90267
Abendstern, Kate	Martinsville	IN	46151
Bledsoe, Vicki	Chehalis	WA	98532
Piana, Roberta	Canton	MA	2021
Mamey, Donna	Palm Desert	CA	92260
Lewis, Claire	Ocala	FL	34481
Powell, Cj	Vandalia	OH	45377
Roose, Karen	Spanaway	WA	98387
Weseman, Lisa	Portland	OR	97233
Ashley, Mary	Oakland	CA	94601

Niday, Ellen	Salem	VA	24153
MacIntosh, Lori	Seattle	WA	98133
Wittig, Katharina	Pracht	OT	57589
Wiley, Kimberly	Rochester	NY	14612
Richard, Jennifer	Ore City	TX	75683
Malven, Tania	Tucson	AZ	85719
Madison, Chelsea	Oakland	CA	94619
Irving-Ball, Michelle	Hayden	ID	83835
Miller, Kristen	Seneca	MO	64865
Thompson, Valerie	Imperial	CA	92251
Welch, Barbara	El Paso	TX	79922
Reaume-Oconnor, Kym	Dearborn	MI	48124
Casner, George	Phoenix	AZ	85023
McLean, Nancy	Glendale	AZ	85310
Beardsley, Andrea	Eugene	OR	97405
Howard, Ruth	Aurora	CO	80010
Haley, Gloria	Denver	CO	80260
Chilcutt, Vicki	Garland	TX	75044
Wolniewicz, Ronald	Toledo	OH	43609
Bobak, Lana	Rochester Hills	MI	48306
Springman, Carol	Mc Farland	WI	53558
G, C	San Diego	CA	92122
Bjorkman, Inge	Placerville	CA	95667
Montarou, Anne	Somerville	MA	2143
Fds, Dg	Dft	AL	35653
Bourke, Kim	Chicago	AK	41679
England, Carrie	Winchester	VA	22602
Wilbur, Leslie	Las Cruces	NM	88005
Conroy, Peggy	West Chazy	NY	12992
Lee, Rebecca	Brooks	GA	30205
Huskey, Natazja	Boise	ID	83702
Balino, Terrie	Tamarac	FL	33321
LemariÈ, Claire	Bayside	NY	11360
Robins, Lacey	Gunnison	UT	84634
Effenberger, Diana	Bossier City	LA	71111
Bates, Kim	Avon Lake	OH	44012
Martin, Patricia	Fort Worth	TX	76134
Foley, Arlene	Turnersville	NJ	8012
Olson, Kelly	Wauconda	IL	60084
Smith, Patricia	Amityville	NY	11701

Holy, Dominique	Los Angeles	CA	90064
Maskew, Karen	Spotsylvania	VA	22551
Watts, Barb	Louisville	KY	40204
Savides, Daphne	Emigrant	MT	59027
Perez, May	Topeka	KS	66605
Falk, Rebecca	Garden Plain	KS	67050
Teneyck, Joyce	Hurley	NY	12443
Stansill, Sarah	Montreat	NC	28757
Palmer, Yvonne	Columbus	OH	43207
Trotta, Brittany	Windham	CT	6280
Putnam, Tamara	Wilmington	NC	28403
Mendelsohn, Judy	Margate City	NJ	8402
Raebel, Laura	Cascade	WI	53011
Jones, Caryn	Manchester	NH	3109
Kahl, Janet	Rohnert Park	CA	94928
Smith, Aubury	Wilmington	NC	28403
Witschey, Jennifer	New Martinsville	WV	26155
Birkby, Andrea Birkby	Golden	CO	80403
Hunter, Jamie	Tucson	AZ	85710
Ewald, Sheryl	Villas	NJ	8251
Delaney, Suzanne	Indialantic	FL	32903
Ramirez, Judith	Ypsilanti	MI	48198
Oggiono, Alyssa	Albany	NY	12208
Soldano, Michael	Ridgefield Park	NJ	7660
Hayes, Julie	Wht Settlemt	TX	76108
Rogers, Nancy	West Tisbury	MA	2575
Bellamy, Dawn	Vero Beach	FL	32967
Brockett, Launi	Phoenix	AZ	85018
La Mastro, Doreen	Sparta	NJ	7871
Smith, Audrey	Wilson	WY	83014
Musante, Georgette	San Francisco	CA	94122
Hall, Carmel	Eastsound	WA	98245
Chesney, Ruth	Morristown	TN	37814
Stein, Rj	Pittsburgh	PA	15212
Bernal, Norman	Taos	NM	87571
McGranahan, Karen	Murrells Inlet	SC	29576
Warren, Angela	Stuttgart	AR	72160
Morrill, Lynn	Landrum	SC	29356
Crabtree, Summer	Jacksonville	FL	32207
Bresnan, Sid	Brooklyn	CT	6234

Bresnan, Donna	Brooklyn	CT	6234
Hubbard, Eddie	McMinnville	TN	37110
Bobe, Pablo	New York	NY	10044
Rose, Donna	Middletown	NY	10941
Davidson, Erica	Colorado Springs	CO	80921
Riepe, Carla	Edgewood	NM	87015
Reed, Margaret	Fincastle	VA	24090
Johndon, Natalie	Tempe	AZ	85282
Schneider, Dianne	Bedford	WY	83112
McKenna, Judith	Pulaski	TN	38478
Farruggia, Victoria	Flanders	NY	11901
Shoemaker, Kathy	Georgetown	SC	29440
Wolf, Lois	Saint Louis	MO	63125
Johnson, Nancy	Villisca	IA	50864
Satterfield, Caroline	West Union	OH	45693
Honish, Robert	Denver	CO	80223
Webb, Charles	Carrboro	NC	27510
Thornton, Lori	Mesa	AZ	85213
Hansen, Vibeke	Schenectady	NY	12345
Taylor, Alison	Leonardtown	MD	20650
Vanderstar, Bev	Geneva	FL	32732
Chatterley, Dana	Sterling	AK	99672
Weber, Lori	Johnson City	TN	37601
Craig, Diane	Beaverton	OR	97008
Raposa, Cyndie	Martinez	CA	94553
Hood, Vivian	Arlington Heights	IL	60004
Erie, Libby	Lake Stevens	WA	98258
Springer, Sherry	Elbert	CO	80106
Tibias, Kate	Scottsdale	AZ	85250
Zeaken, Susan	Midlothian	IL	60445
Patterson, Suzanne	Jefferson	GA	30549
Powers, Helen	Fort Wayne	IN	46806
Walton, Heidi	Earp	CA	92242
Lott, Michelle	Houston	TX	77070
Smith, Theresa	Simi Valley	CA	93065
Cross, Shannon	Phoenix	AZ	85028
Sampoli, Penelope	Woodbridge	CT	6525
Marinak, Marie	Newtown Square	PA	19073
Kirk, Melinda	Saint Petersburg	FL	33713
Lambert, Paulette	Concordpenacook	NH	3303

Vergun, Alexandra	Chapel Hill	NC	27517
Hasty, Barb	Sun City West	AZ	85375
Frye, Mary Ellen	Rochester	NY	14609
Schumacher, Amy	Beavercreek	OH	45440
Kenyon, Abby	Richmond	VT	5477
Lyon, Angela Treat	Chico	CA	95926
Hughes, Bonnie	Scottsdale	AZ	85266
Albertson, Mary	Portsmouth	VA	23701
Fleiss, Amy	Valley Village	CA	91607
Lamb, J.	Cambria	CA	93428
Duncan, Ananda	Rocklin	CA	95677
Ott, Maureta	Pickerington	OH	43147
Shore, Donna	Dayton	NV	89403
Conti, Carolyn	Rosamond	CA	93560
Smetaniuk, Mari	Woodhaven	NY	11421
Dickinson, Lisa	Tuttle	OK	73089
Worth, Braxton	Tempe	AZ	85281
Klein, Victoria	Pekin	IL	61554
Morton, Jeanne	Edina	MO	63537
Madrid, Lisa	Florence	AZ	85132
Nemeth, Linda	Round Lake Beach	IL	60073
Lemoine, Kathryn	West Monroe	LA	71291
Ruffolo, Marc	San Francisco	CA	94121
Aiton, William	Purcellville	VA	20132
Clark, Bill	Eau Claire	WI	54703
Patton, Kathy	Las Vegas	NV	89104
Dale Kent, Karen	Marengo	IL	60152
Stockton, Emil	Mound House	NV	89706
Smith, Valerie	Lake Barrington	IL	60010
Leath, Jan	Glendale	CA	91205
Treadway, Pat	Abingdon	VA	24210
Hirsch, Melinda	Bellevue	WA	98005
Thomas, Sharon	Haslett	MI	48840
Johnson, Robert	Great Neck	NY	11020
Cloutier, Peter	New Britain	CT	6052
Lim, Robin	New York	NY	10002
Wilkie, Marilyn	New Rochelle	NY	10801
Nowak, Lisa	Tucson	AZ	85716
Granger, Rebecca	Lafayette	LA	70506
Hendrixson, Kerith	Laramie	WY	82072

L, Wanda	Billings	MT	59105
Zins, Kathleen	Cortez	CO	81321
Smith, Jonathan	Honesdale	PA	18431
Ferrara, Michael	Chandler	AZ	85225
Pesko, Pat	Rice Lake	WI	54868
Kaszas, Peggy	Halifax	MA	2338
Williams, Marti	Yuma	AZ	85364
Manifold, Lisa	Gold Canyon	AZ	85118
Sheets, Lucy	Whitehouse	OH	43571
Reynolds, Laurie Ann Reynolds	Black Diamond	WA	98010
Moroney, Sharon	Grenada	CA	96038
Vetma, Sue	Cincinnati	OH	45233
Sambrano, Barbara	Las Vegas	NV	89123
Lahalih, Lila	Elgin	IL	60120
Leary, Virginia	Garrison	NY	10524
Narog, Marcia	Moreno Valley	CA	92555
Vigil, Kathy	Peralta	NM	87042
Leigh, Tahoe	Schenectady	NY	12345
Dickinson, Gwendolyn	Erie	CO	80516
Stephens, Barbara	North Myrtle Beach	SC	29582
Cook, Vicki	Buckeye	AZ	85396
Fodale, Nina	Galena	KS	66739
McMurray, Deborah	Rohnert Park	CA	94928
Sunblade, Barbara	Parker	CO	80134
Walsh, Bonnie	Scottsdale	AZ	85266
Palmieri, Cindy	Burbank	CA	91501
Houser, Osalyn	Albany	OR	97321
Shoemaker, Debra	Kingwood	TX	77339
Piojda, Angela	Mount Pleasant	NC	28124
Shipmon, Lutetia	Rochester	NY	14609
Lepre', Elizabeth	Centreville	MD	21617
Suttle, Jill	Midland	MI	48642
Farrell, Jim	Fairbanks	AK	99701
Ward, Pat	Portland	OR	97203
Gese, Sandy	Ione	WA	99139
Lovelace, Lanelle	Columbia	CA	95310
Kramer, Kim	Bismarck	ND	58502
Luerssen, Karen	Indianapolis	IN	46256
Bailie, Janae	Kingman	AZ	86409
Albrecht, Yvonne	Tucson	AZ	85715

Rowland, Amanda	Langley	KY	41645
Moser, Carolyn	Tucson	AZ	85749
Dupont, Susan	Roanoke	LA	70581
Woodall, Pam	Bonham	TX	75418
Whitehead, Kelly	Wallingford	PA	19086
Porter, Jane	Richmond	VA	23223
Tuttle, Terry	Cuyahoga Falls	OH	44223
McGinny, Brina	Pueblo	CO	81002
Glover, Melissa	Little Rock	AR	72210
McNamara, Maureen	Tehachapi	CA	93561
Borowsky, Sonya	Conshohocken	PA	19428
Peterson, Julia	Bellingham	WA	98229
Mervar, Judy	Berlin Center	OH	44401
Heysham, Nancy	Whittier	CA	90604
Branson, Diana	Burnet	TX	78611
Williams, Carla	Mesquite	TX	75149
Driscoll, Marie	Lees Summit	MO	64081
Davis, Stephanie	Whitney	TX	76692
Gibson, Elma	Hibbing	MN	55746
Rominger, Christine	St Augustine	FL	32084
Gross, Nancy	Boardman	OH	44512
Moore, Caitlyn	Salt Lake City	UT	84103
Swanson, Kathy	Elizabeth	CO	80107
Schou, J	Fort Worth	TX	76244
Doherty, Pat	Cherry Valley	CA	92223
D, Amanda	Yorktown Heights	NY	10598
Voyer, Janice	Summerville	SC	29486
Ferrusi, Danielle	Vancouver	WA	98682
Datcu, Ioana	Sunsites	AZ	85625
Anderson, Georgia	Fresno	CA	93722
Peak, Robin	Tempe	AZ	85283
Sparks Duncan, Cheryl	Terre Haute	IN	47802
Rich, Linda	Huntington Station	NY	11746
Faucher, Sandra	Denver	CO	80223
Capuchino, Susan	Clayton	DE	19938
MacGillivray, Nancy	Carson City	NV	89701
McFadden, Pamela	Phillipsburg	NJ	8865
Serrao, Ilona	Redmond	OR	97756
Vanbeek, Natalie	Tampa	FL	33602
Quinones, Ruth	Brooklyn	NY	11218

Miller, Laura	Bethel Park	PA	15102
Turner, Leslie	Buena Vista	CO	81211
Dominguez, Mari	Linden	CA	95236
Hart, Donna	Fredericksburg	VA	22407
Gamache, Madeleine	Shoreham	NY	11786
Beryt, Marta	Fresno	CA	93730
Garlit, Donald	Canton	MI	48187
Messler, Elizabeth	Tomball	TX	77375
Leon, Jennifer	Tampa	FL	33604
Hebert, Pamela	Pittsburgh	PA	15235
Walls, Mary	Jacksonville	FL	32218
Davis, Gail	Las Vegas	NV	89145
Wilson, Tanya	Glendale	CA	91202
Jocewicz, Malorie	Lemont	IL	60439
Burke, Eleanor	Milwaukee	WI	53219
Oliva, Suzanne	Santa Fe	NM	87508
Chaffin, Barbara	Mesa	AZ	85209
Rousseau, Mary	Novato	CA	94947
Lytle, Gail	Turlock	CA	95380
Barker, Richard	Beaverton	OR	97007
Douglas, Dianne	Phoenix	AZ	85042
Aden, Sandi	Lincoln	NE	68521
Fisher, Pamela Fisher	Tucson	AZ	85748
Barnes, Sheryl	Stormville	NY	12582
Stoneman, S	San Francisco	CA	94117
Kaiser, Kristina	Flagstaff	AZ	86001
Hedblom, Luanne	Phoenix	AZ	85045
Irons, Robert	Crescent City	CA	95531
Czichos-Slaughter, Romona	Hollister	CA	95023
Sweatland, Judy	Volcano	HI	96785
Simpson, Jill	Kirkland	WA	98033
Shockency, Dawn	Coleraine	MN	55722
Meister, Pamela	Tucson	AZ	85742
Oleson, Casey	Red Bluff	CA	96080
Passman, Deborah	Prairie Village	KS	66208
French, Yvonne	Battle Creek	MI	49017
McCullough, Sherry	Trenton	MI	48183
Malley, Rosemary	South Lake Tahoe	CA	96150
Woodward, Earl	Upland	CA	91784
Daubar, Stacy	Tampa	FL	33681

Syed Mohammad, Sharifah Farah			
Debah	Bayboro	NC	28515
Harris, Debra	Buckeye	AZ	85326
Albrecht, Yvonne	Tucson	AZ	85715
Palladine, Michelle	Palm Springs	CA	92262
Bateman, Ursula Vezine	Kitty Hawk	NC	27949
Comette, Tami	Fairfax	VT	5454
Schmidt, Jacqueline	Coloma	MI	49038
Bloom, Mike	San Diego	CA	92138
Dominc, Bostjan	Bridgewater	MA	2325
Podhraski, Silvija	Bridgewater	MA	2325
Schneeberger, Ann	Wellington	FL	33414
Monte, Janet	Brooklyn	NY	11209
Hall, Justen	Millbrook	AL	36054
Hey, Hey	Pune	AR	21818
Wolfe, Kathy	Sherman	NY	14781
Peteinaraki, Mary	Heraklion Creta	LA	71305
Mannolini, Audrey	Huntington Beach	CA	92646
Raab, Ken	Oswego	IL	60543
Belan, Rosemarie	Rockwood	TN	37854
Adcock, Joann	Loami	IL	62661
DuBois, Chuck	Prescott	AZ	86301
LaBrecque, Cheryl	Chelmsford	MA	1824
Kline, Theresa	Centreville	MD	21617
Enders, Mary	Gilbert	AZ	85234
McCanless, Tamara	Brea	CA	92821
Coonahan, Mary	Skippack	PA	19474
Coonahan, Mary	Skippack	PA	19474
Brown, Barbara	Caldwell	TX	77836
Parker, Susanne	Decatur	TX	76234
Judice, Rene	Saint Martinville	LA	70582
Cushman, Kathryn	Canterbury	NH	3224
Karstens, Tina	Gretna	NE	68028
Allensworth, Donna	Las Vegas	NV	89102
Love, Jennifer	Ashford	AL	36312
Niday, Eeen	Salem	VA	24153
Knipp, Donna	New York	NY	10034
Denike, Susan	Lacey	WA	98503
Macy, Michelle	Houston	TX	77077
Kozel, Susan	Stockbridge	GA	30281

Love, Dianna	Springfield	OR	97478
Skurkis, Cheri	Littlefork	MN	56653
Kipling, Caroline	Abington	MA	2351
Kramer, Karen	Saint Louis	MO	63127
Nemeth, Linda	Round Lake Beach	IL	60073
Nemeth, Linda	Round Lake Beach	IL	60073
Rogers, Yvette	Bayboro	NC	28515
Jayson, Patricia	Phoenix	AZ	85028
Gehring, Patricia	Billings	MT	59102
Geohegan, Kasha	Queen Creek	AZ	85142
Ringham, Kristen	Minneapolis	MN	55406
Muratore, Beth	Elverson	PA	19520
Brown, Pamela	San Diego	CA	92117
Demarais, Jackie	Whitehouse	TX	75791
Berryman, Jill	Glendale	AZ	85306
Blodgett, Burt	Mill Valley	CA	94941
Baier, Mary Ann	Dearborn	MI	48124
Kelesis, Paula	Las Vegas	NV	89129
Harper, Jeannette	Bandon	OR	97411
Rogel, Michele F	Surprise	AZ	85388
Newhagen, Jill	Mesa	AZ	85210
Buck, Jeanann	New Milford	CT	6776
Fisher, Kay	Denver	IA	50622
Chandler, Becky	South Charleston	WV	25303
Morrison, Colleen	Prospect Heights	IL	60070
Tomchik, Jaime	Baltimore	MD	21234
Kersten, Connie	Mesa	AZ	85215
Roberts, Rebecca	Jefferson	GA	30549
Caputo, Lisa	Manorville	NY	11949
Hildebrand, Valerie	Cleveland	OH	44134
Digiacommo, Alexandra	Durham	NC	27713
C, Stephanie	Allen	TX	75013
Smith, Rachel	Chelsea	OK	74016
Cawley, Annie	Saint Joseph	MO	64503
Cotton, Christine	Ellsworth	ME	4605
Cotton, Christine	Ellsworth	ME	4605
Manitzas, Dee	Fair Oaks Ranch	TX	78015
Collings, Dana	Austin	IN	47102
Wills, Paula	Palm Coast	FL	32164
Shull, Judy	Oakley	CA	94561

Gelsomino, Rene	Luling	LA	70070
Peine, Debby	Bloomington	IL	61701
Sunblade, Barbara	Parker	CO	80134
Taylor, Evelyn	Copperas Cove	TX	76522
Lock, Stacey	Krum	TX	76249
Serman, Nina	Holland	MI	49423
Courts, Ian	Evergreen	CO	80439
Thomas, Patricia	Kinston	NC	28504
Davis, Linda	Atoka	OK	74525
Nicholl, Helen	Lindenhurst	NY	11757
McCurdy, Beverly	Santa Barbara	CA	93110
Clausen, Nina	New York	NY	10004
Leuenberger, Carol	Elk Grove	CA	95624
Shober, Stephanie	Castle Pines	CO	80108
Yarosis, Nancy	Benson	NC	27504
Snyder, Cheryl	Abington	MA	2351
Rorvik, Pete	Ronan	MT	59864
Harmon, Jennifer	Temperance	MI	48182
Kelsey, Jo Lynne	Gilroy	CA	95020
Houshour, Debbie	Myrtle Point	OR	97458
Diaz, Barbara	Montebello	CA	90640
Napoli, Kerri	Rohnert Park	CA	94928
Fairfield, Diane	Saint David	AZ	85630
Tesar, Sandra	Ivanhoe	VA	24350
Rowell, Bonnie	Jericho	VT	5465
Hilgendorff, Justin	Sandy	UT	84092
Hilgendorff, Justin	Sandy	UT	84092
Richards, Susan	Newton	IA	50208
Thompson, Mrs.Margaret	Riverside	CA	92506
Cook, Debra	Clovis	NM	88101
Embry, Judith III	Florida	MA	1247
Langan, Barbara	Huntingdon	PA	16652
Peters, Lydia	Cave Spring	GA	30124
Morrison, Colleen	Prospect Heights	IL	60070
Zaslove, Laurie	Pensacola	FL	32505
Mascolo, Filomena	New Britain	CT	6051
Standridge, Lavaughn	Aurora	CO	80012
Howard, Sharon	Big Rapids	MI	49307
Beth, Barbara	Ridgewood	NY	11385
Cowden, Sheila	Scottsdale	AZ	85259

Foulger, David	Apple Valley	CA	92307
Giannetti, Deb	Watertown	CT	6795
Scott, Shawn	Mesa	AZ	85208
Chilcher, Amanda	Mesa	AZ	85202
Bartlett, Shanie	Underhill	VT	5489
Smith, David	Munford	TN	38058
Suit, Karen	Falling Waters	WV	25419
Papillon, Alfred	Summerville	SC	29485
Ransom, Terry	Florissant	MO	63031
Wilbur, Lynn	Sitka	AK	99835
Riddle, Dagmar	Whitehall	MT	59759
Pink, Pamela	El Sobrante	CA	94803
Phillips, Susan	East Bend	NC	27018
Card, Geraldine	Exeter	CA	93221
Eng, Joann	Las Vegas	NV	89148
Brierly, Jeff	Milford	OH	45150
Chuplis, Cindy	Middleport	PA	17953
Musser, Jeralyn	Arkport	NY	14807
Ivanova, Zara	Anchorage	AK	99501
Crupi, Kevin	Marquette	MI	49855
Helmer, John	Gardnerville	NV	89410
Murray, Tara	Jefferson	MA	1522
Barton, Perilyn	Midvale	UT	84047
Sigurjonsson, Gail	Carmel	NY	10512
Sorensen, Sally	Westerly	RI	2891
Dorward, Dolored	East Texas	PA	18046
Webster, Claire	Homer	NY	13077
Newman, Sally	Northfield	OH	44067
Hilgendorff, Justin	Sandy	UT	84092
Metsinger, Pat	Louisburg	KS	66053
Newbold, Debbie	North Canton	OH	44720
Languedoc, Jehanne	Newbury Park	CA	91320
Fox, Nancy	Mantua	OH	44255
Fox, Nancy	Mantua	OH	44255
Kovacs, Sylvia	Hackettstown	NJ	7840
Stevens, Elaine	Madison	WI	53718
Martin, Robin	Micanopy	FL	32667
Caulk, Jim	Orland Park	IL	60467
Caulk, Linda	Orland Park	IL	60467
Caulk, Linda	Orland Park	IL	60467

Dannhauser, Janice	Kansas City	MO	64154
Holland, Kirsten	Eureka	MT	59917
Shields, Mike	Henderson	KY	42420
Weber, Mariann	Sonoma	CA	95476
Geronimo, Ginger	Birmingham	AL	35235
Nunez, Kim	Grass Valley	CA	95949
Correa, Hana	La Quinta	CA	92253
Smith, Cathy	Rockwall	TX	75087
Quintana, Sherese	San Pedro	CA	90731
L, D	Albuquerque	NM	87105
Johnson, Barbara	Rochester	NY	14626
Mark, Brandon	Salt Lake City	UT	84105
Newlin, Dawn	Colorado Spgs	CO	80909
Cook, Eryn	Denver	CO	80216
Haines, Kyle	Hood River	OR	97031
Prochaska, Rebecca	Eden Prairie	MN	55347
Pinto, Connie	West Lawn	PA	19609
Forman, Janet	New York	NY	10011
Winter, Maika	Scottsdale	AZ	85250
Sutliff, Leslie	Ashley	MI	48806
Lund, Linda	Cleveland	OH	44119
Shipman, Sharon	Salem	OR	97301
Slack, Debbie	Lynchburg	VA	24502
Weise, Deb	Denver	PA	17517
Steiner, A.L.	Los Angeles	CA	90063
Vassiliou, Ann	Longwood	FL	32779
Waterman, Glenna	Brookline	MA	2445
Schrader, Stacy	Osawatomie	KS	66064
Sequichie-Kerchee, Debbie	Cache	OK	73527
Krieger, Karen	East Brunswick	NJ	8816
Madlener, Christina	Walnut Creek	CA	94598
Delcorpo, Kathleen	Branchville	NJ	7826
Watson, Robert And Ursula	Durham	NC	27705
Muriel, Alexa	Willows	CA	95988
Bingham, Celana	Lexington	NC	27295
Nicholson, Kaitlyn	Glenview	IL	60026
Hosford, Twila	Harrisburg	AR	72432
Stengel, Brynn	Lacey	WA	98503
Vaughn, M Catherine	Tempe	AZ	85281
Beehn, Kathy	Las Vegas	NV	89128

Hossinger, Susan	East Lansing	MI	48823
Upperman, Lisa	Phoenix	AZ	85013
Hessman, Catherine	Longs	SC	29568
Denney, Heather	Maineville	OH	45039
Swift, Sally	Bath	NY	14810
Sobel, Patricia	Burtonsville	MD	20866
Doherty, Pat	Cherry Valley	CA	92223
Rivas, Teresa	Riverton	NJ	8077
Rivas, Mary	Riverton	NJ	8077
Rivas, Will	Riverton	NJ	8077
Guilds, Suzanne	Mesa	AZ	85207
Iacone, Shari	Syosset	NY	11791
Hazelip, Cynthia	Sutherlin	OR	97479
Tiittula, Paivi	New Haven	CT	6530
Sullivan, Margo	Newport	RI	2840
Stout, Glenna	Berkshire	NY	13736
Ulovec, Ted	San Diego	CA	92126
Spencer, Joanne	Belfast	ME	4915
Connor, Audrey	Beverly Hills	CA	90210
Ackerman, Gail	Milwaukee	WI	53217
Fitzpatrick, Sandra	Leverett	MA	1054
Shelton, Carol	Bedford	TX	76022
Hurley, Sharon	Flagstaff	AZ	86004
Goudreault, Christine	Prescott	AZ	86305
Karpel, Jan	Minneapolis	MN	55426
Douglas, Dianne	Phoenix	AZ	85042
Bonk, Denise	Philadelphia	PA	19134
Kennedy, Robin	Mineral Ridge	OH	44440
Deller, Heidi	Cincinnati	OH	45243
Hodges, Suzanne	Rancho Cordova	CA	95670
Puglis, Frank	Elmwood Park	NJ	7407
Barrios, Enzo	New York	NY	10022
Rohloff, Rosalyn	Golden	CO	80403
Rensberger, Wanda	Kingman	AZ	86401
Lagerblade, Chris	Phoenix	AZ	85028
A, K	Gaithersburg	MD	20878
Wolf, Karen	Baltimore	MD	21224
Presley, Gerald	Chattanooga	TN	37421
Richie, Lauren	Pleasant Grove	AL	35127
Clark, Stephanie	Brookfield	MA	1506

Harris, Freya	Decatur	GA	30032
Edie, Amy	Lake Elsinore	CA	92530
Zimmerman, Sophia	Houston	TX	77074
Gottone, Pamela	Pine	CO	80470
Kinslow, Janis	Aston	PA	19014
Moody, Cathe	Rocklin	CA	95677
Settle, Charmaine	Delray Beach	FL	33483
Maloney, Patrick	Chicago	IL	60657
Bailey, Nancy And Denis	Prescott	AZ	86305
Hultquist, Kathy	Sarasota	FL	34234
Heather, Angela	San Francisco	CA	94105
Eilers, Jennifer	Minneapolis	MN	55404
Simmons, Carolyn	Sarasota	FL	34232
Holmgren, Jeanette	Boden	AZ	96167
Reiseck, Lynore	Fort Lauderdale	FL	33312
Israel, Paula	Novato	CA	94947
Garcia, Beverly	Norman	OK	73072
Meecham, Jemma	Citrus Hts	CA	95610
Hatfield, Carol	Indianapolis	IN	46203
Brinker, Sandra	Sarasota	FL	34238
Mendieta, Vince	Austin	TX	78715
Bartz, Elizabeth	Bellaire	MI	49615
Stocks Ms, Patrick	Show Low	AZ	85901
Pappano, Ruth	Tempe	AZ	85282
Fleiss, Amy	Valley Village	CA	91607
Brinker, Erica	Randolph	NJ	7869
Nelson, Mary	Mission Viejo	CA	92691
Kopischke, Amy	South Salt Lake	UT	84115
Snow, Jacqui	Parker	CO	80138

http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/97734_FSPLT3_2465346.pdf

Federal agencies are required by the National Environmental Policy Act (NEPA) to mention and discuss all laws applicable to the area of a proposed action in the EA.

The EA discusses an allotment that covers more than half of the very last FS territory for wild horses in Arizona, yet completely omits to mention the 1971 Wild Free Roaming Horse and Burro Act or Forest Service directives regarding wild horse territories.

We ask that you redo this draft Environmental Assessment and include the effect that the proposed action may have on the remaining Heber wild horses within the territory.

Originally the Forest Service established 12 wild horse and burro territories in Arizona in accordance with the 1971 Act. They have all been zeroed out since then. The Heber territory is the last territory left with wild horses in it.

Attached is an article from 1907. It states that two men from Heber, had the profession of catching wild horses above Heber and that they were quite successful in their endeavor. From this article in the Holbrook Argus, it can be concluded that wild horses did not just show up after the Rodeo-Chedeky fire and have been there even long before the Forest Service was established.

Proof also exists to suggest that there were not just a few bands of wild horses in 1971 in the area. A rancher admits on tape, that he removed 187 wild horses in 1974 and received the title to them from the Forest Service. He states that he removed them for fear that it might become a protected refuge for wild horses. The Forest Service failed to enforce the 1971 Act. It would be reasonable to reinstate this same number and add it to any proposed AML in the upcoming NOI.

The wild horses were large in number back then and the horses were of little value to anyone. The forest service put out a standing order to shoot every wild horse in the year 1908 according to more historic articles from the library of congress.

In 1927 the Arizona Reduction works company estimates half a million wild horses in the state of Arizona. The article is attached. It also explains what happened to so many of them.

The attitude towards wild horses has changed since the early 1900's and it is time to protect the last of Arizona's wild horses. The intent of the 1971 Act is to preserve wild horses for future generations and regard them as an integral part of the ecosystem like they have been for centuries. There are currently less than 500 remaining on Arizona public lands. This includes the BLM HMA's. They are a treasure to all Arizonans and Americans alike.

We request that you look at all evidence and regard and treat them as the precious resource and historic treasure they are. They are in danger of disappearing forever from Arizona public lands. This needs to be taken into consideration in your proposed action in the EA.

A genetically healthy and viable herd consists of 200 animals, which is where the current population lies. The goal should be to maintain the herd at this number, catalog and monitor the herd and humanely dart the mares with PZP yearly in order to reduce the growth rate to 0%. (Natural death rates are 10% on average, therefore the birthrate can be at 10% in order to keep the growth rate at 0%.)

We request that you redo the draft EA in order to take into consideration all uses of the forest, including tourism and eco tourism, the overall biodiversity, wildlife, predators as well as the wild horses.

Thank you,

Simone Netherlands,

Historic newspaper Library of Congress:

The Holbrook Argus, Holbrook Arizona, Navajo County, Tuesday October 1, 1907:
"Red Holcom and Charlie Osborn who are engaged in capturing wild horses above Heber, were Holbrook visitors for several days last week. They report fair success in this rather novel enterprise."

From the article Wild Free-Roaming Horses in Danger of Removal from Arizona Public Land

"Prior to the Rodeo-Chediski fires in 2002, I had seen herds of wild horses throughout the Heber/Overgaard area. The size of the herds have [sic] varied but have [sic] included at least a dozen horses at any given time," said Ron Britz, a full-time resident of the area since 1980.

"None of the horses were branded or had any domestic markings, to the best of my knowledge."

From the interview with

From the article

The Ft Apache herd is the same as the Heber Wild Horse herd. The Apache Indians refused an offer from the American government agent to get rid of their wild horses. Indians valued their wild horses while U.S. government tried to exterminate all of them until the 1971 Act mandated them to do otherwise.

There used to be half a million wild horses in Arizona. The plains are now empty of them. They are the very few on AZ public lands, who survived persecution for centuries by mustangers and ranchers and the Forest Service, they evaded being caught in 1974 by a local rancher and survived the rodeo-chedisky fire. It is by a miracle that they are still there. All of them should be afforded protections under the 1971 Act and live their lives out in freedom.

A management program should be started where volunteers gather accurate and scientific information on them. A pzp program should be started to maintain the herd at a viable and reasonable amount of 200 horses.

They are the last survivors on our public lands of centuries of persecution and extermination by our government and ranchers. The Arizona plains once used to have over half a million wild horses on them. There are now less than 500 left in the entire state on our public lands.

Mankind feels too entitled to everything on this earth. We are too ignorant to see what we are doing. Can we leave nothing the way it was when we found it? Is the attitude going to change before the wild horses and the rest of the beautiful forest and wildlife are gone? Only time will tell. History has only ever been made by those who care about the future. Make those public comments people! Contact the media, write to your congressman, write to your newspapers. History is made by YOU.

As made

clear by the unanimously passed Congressional Wild Horse and Burro Act's implementing regulations, the agencies (BLM & USFS) "may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock . . . if necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury." 43 C.F.R. § 4710.5(a).

They are the last survivors on our public lands.

The plains of the west were once famous for the thousands of wild horses. Lewis and Clark wrote about them, George Catlin painted them in 1848 and Rosa Bonheur painted them with the help of buffalo bill in 1890. The pony express rode tamed mustangs in from 1848 because they were the only horse with the surefootedness to run across America.

Wild horses were thriving in America before white people ever settled the west. Before the declaration of independence, before Arizona was a state and long before before the Forest Service and the BLM were established. They ran wild and free together with the buffalo. Their fate was also much like that of the buffalo.

In many history books it is omitted, but in thousands of historic articles you can read how they were shot, poisoned, driven off cliffs, tied and left to die, or caught for slaughtering and bronco busting. Over the past two centuries wild horses have suffered by the millions.

This article talks about a processing plant in Arizona stating that there are over half a million wild horses. This article talks about a wild horse hunt in Fredonia, Navajo county. This article shows that in 1907 these two gentleman were in the business of catching wild horses above heber, Arizona, proving that the heber wild horses did not result from loose ranch horses. This article talks about the Forest service issuing an order to shoot any wild horse on site.

In 1971 the wild free roaming horse and burro act was passed and it was the intent of congress to protect and give wild horses a right to live on our public lands together with its other uses. It was meant to stop the removal of our wild horses, it was meant so that wild horses could be an integral part of our public lands.

However the BLM and Forest Service were put in charge of carrying out this mandate. Imagine if you thought you were doing ranchers and all Americans a great favor by exterminating wild horses and that the next day you were now put in charge of protecting them instead. That is like putting the rat exterminator in charge of protecting rats. The exterminator will find a way to make it ok to still get rid of the rats just more in an under the table kind of way.

The plains are now empty of wild horses and the only places where you can still see wild horses are hard to find. territory remaining by the forest service is not even mentioning wild horses in their EA to increase grazing.

The forest service has several mandates and goals to operate under, not just the one to allow for cattle grazing where possible. This EA fails to address or even mention other mandates and uses of the public land in question. According to Nepa requirements all applicable laws and mandates are to be considered in the EA, therefore this EA is incomplete at best.

The Salt River Wild Horse Management Group represents the opinion of our supporters and members. Our demographic of the public visit and appreciate not only the wild horses, but especially the beautiful natural state of our western wildernesses. Our members and directors visit the areas in question (both salt river and Heber wild horse areas) frequently and are familiar with the ecosystem, as well as with the human related and cattle related

challenges it faces. We document, name and track each horse and each band in a wild horse App in order to get a true scientific perspective on herd growth and migrating patterns.

We are against the proposed action for the Sunflower Allotment for the following reasons:

In the Environmental Assessment the following was completely omitted:

The secretary under the is mandated to maintain a wild horse territory and assess the impact to the wild horses. The mandate to allow for cattle grazing was excessively mentioned yet the mandate to protect wild horses from harassment for the public interest was completely omitted. In an EA all applicable laws and mandates need to be acknowledged and addressed as well as assessed, therefore this EA is incomplete. By failing to address all applicable laws the Forest Service is mandated to obey this EA is unlawful and incomplete.

concerns were not addressed:

1. The permittee rancher has not maintained current fencing in good condition and leaves dangerous downed barbed wire.
3. The science behind the environmental conclusions was not supported by pictures or video of the scientific areas that were monitored.
4. We do not agree with the proposed water projects, water pipelines, proposed fencing and salting as they would have a habit forming result on wildlife.
5. There will be no contribution to communities that depend on range resources for their livelihood, with the exception of one cattle company, therefore there is no need for change under FSM 2201.1
6. The Allotment is not doing well under current numbers of livestock grazing as disclosed in the EA under soil conditions that are only 8% recovered. Therefore movement toward desired direction can only be accomplished by proposed non action or closure or retiring of this allotment.

We disagree with the spending of 4 million dollars in taxpayer money to solely benefit one company at the expense of the forest and the ecosystem. The millions may be better spent to pay off the cattle company and retire the grazing allotment.

Our opinion is based on the following facts:

- 1.** The current company has not exhibited good public land stewardship, much old fencing is down and forms dangerous traps for wildlife. This is not fair to wildlife, the public nor the Forest Service.
- 2.** The assessment of "no significant impact" and "further improvement will occur" and "movement towards desired outcome" resulting from proposed action, cannot possibly be true in our opinion for the following reasons:

*Cows do not contribute positively to the environment in any way, (unlike wild horses, which do)

*Ruminants (cattle) produce methane gasses CH₄. (horses are non ruminants).

Information from the EPA website:

<http://epa.gov/climatechange/ghgemissions/gases/ch4.html>

"Agriculture: Domestic livestock such as cattle, buffalo, sheep, goats, and camels produce large amounts of CH₄ as part of their normal digestive process. Because humans raise these animals for food, the emissions are considered human-related. Globally, the Agriculture

sector is the primary source of CH₄ emissions. For more information, see the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* Agriculture chapter."

*In manure of ruminants (cattle), plant seeds cannot survive as it has bypassed many stomachs with acid that break down the seeds, therefore they do not contribute to seed distribution or reproduction of vegetation. (horse manure contains live plant seeds that will then sprout in a bed of natural fertilizer)

*Cattle have two toes, splitting up earth and mashing it into mud especially around the water sources and riparian areas. (as apposed to one flat hoof that stays on top of the dirt making only minor impressions.) Since there are many riparian areas within the proposed grazing units much damage is expected to occur.

*Cattle do not have migrating patterns like horses, they often linger closely to their water sources, thus concentrating degradation in the riparian areas.

*Cattle do not have front teeth; they grab a piece of vegetation and rip it off with their tongue so that the root often comes with the plant. Without the root of the plant, there is no regrowth. (In comparison wild horses "prune" vegetation, encouraging regrowth year after year.)

*The cumulative impact over many years of grazing in the allotment will be significant, as regrowth will occur more slowly than destruction occurs.

*The proposed fencing projects and water projects will have significant habit forming impacts on wildlife.

3. Under FSM 2201.1, there is no need for change.

*One out of state cattle company does not have an impact on counties or local businesses. There will be no contribution to communities that depend on range resources for their livelihood under FSM 2201.1

*On a scale; one rancher and one cattle company should not out-way the health of 157,000 acres of wilderness plus revenue from tourism and visitors to the National Forest plus a huge negative balance for tax payers and the Forest Service. Cost benefit analysis comes up with huge costs to only one benefit to one company. This is completely unjust towards the public's interest and unequitable to the U.S. treasure chest.

*Nowadays ranching on public lands does not contribute much to our overall national income, accordingly less of our public lands should be designated for this purpose. Ranching on public lands only represents 2% to 3% of our national beef supply.

*The Forest Service is aware that the current formula for grazing fees does not begin to cover the cost of the grazing program. Grazing is conducted at the expense of the tax payer, and as such not equitable or fair to the United States of America. The program to subsidize grazing at a cost far below market value is costing the government 123 million dollars per year. We believe that the FS mandate of allowing grazing permits at prices far below market value has outlived its original purpose to help ranchers and settlers. In the current economy it is a completely outdated strategy for managing national forests.

4. We do not agree with the assessment of "no significant impact to recreation".

*thousands of recreational users come to enjoy the highly scenic Arizona wildernesses. Wild horses contribute to the beauty and interesting historical aspect of Arizona's wild west. Wild horses were declared by Congress as contributing to the life forms within the Nation and enriching the lives of American people. Cows do exactly the opposite and take away from the enjoyment of the natural beauty of the wilderness, and recreation and tourism dollars will suffer because of it.

*We have so many visitors to our Arizona Wildernesses because they are some of the most beautiful and scenic areas left in the West. Wild horses were always part of the natural landscape, cows were not. It is our opinion that we should leave the land in trust for future generations, the way that we found it.

*Fencing projects will inhibit the movement of recreationalist.

5. Previous behavior has shown that the rancher and the cattle company may not be a good steward of public lands. Said rancher may kill predators to protect his livestock and as a result upset the sensitive natural balance. He may inadvertently place fences that will fence out wild horses from water, they cannot crawl under fences and may die slowly of dehydration as a result.

*The area has difficult terrain to gather and remove cattle, once they are released. The "Bundy situation" was an example of non-compliance from a rancher, in which case the public loses and the Forest Service loses. We have seen in some cases that permittees feel extremely entitled to the land they have a permit on. We request to see the history of this cattle company of payments to the Forest Service.

*Any friendly or familial connection between the forest service and this rancher in question would not be ethical or moral.

Conclusion:

This grazing allotment is situated in one of Arizona's most pristine forest wildernesses. Livestock production is in direct conflict with every other use of these public lands in question, such as recreation, wildlife and wild horse protection and restoring health of public lands.

We feel that the meagly grazing fees, which the Forest Service will receive are a sad financial gain, compared to the enormous loss it represents to the public. It also represents a risk to the Forest Service that permittee may not comply with FS policies. It also will cost tax payers an exuberant amount of money and it is not mentioned where this money will be coming from. This proposed action is NOT a good deal for the Forest Service, for the tax payer, for the Arizona visitor or for Arizona's natural beauty.

We strongly request the alternative of no action or better to retire the allotment permanently.

Thank you,
The Salt River Wild Horse Management Group and Respect4Horses.

"By way of the Wild Free-Roaming Horses and Burros Act definition of "wild horses," most of the 300 to 400 horses are covered by its protections. Investigation to date shows that the horses are unclaimed (and almost entirely unbranded) and living on protected public land, and there is no way to distinguish

possible stray domestic horses from historic wild horses without a brand. Horses who do have brands should be rounded up responsibly and returned to their rightful owners; the rest should be allowed to run free.”

The Heber Allotment Environmental Assessment is out and comments are due THIS FRIDAY.

NOTE:

"Heber Grazing Allotment Analysis #43442 Public Comment"

MUST BE in the subject line of your email in order for your comment to count!!

Send email to: comments-southwestern-apache-sitgreaves-black-mesa@fs.fed.us

This is the link to the Heber Allotment Environmental Assessment:

http://a123.g.akamai.net/.../www/nepa/97734_FSPLT3_2465346.pdf

- please note we've been having difficulty getting it to work consistently. I am happy to help you if I can!

Some talking points:

1) The NO grazing alternative is the least expensive.

The document requests structural and nonstructural improvements totaling over \$4 million dollars and does not indicate a specific funding source. The document states, "“Projects such as these have the potential to be multi-financed between several partners, such as AZGFD, wildlife groups, permittee, and the Forest Service.” We can assume that taxpayers will be responsible for all if not most of the costs unless they tell us otherwise.

2) The NO grazing alternative has the greatest potential to stimulate the economy and increase tax revenues.

According to the latest census data regarding the Heber/Overgaard area (courtesy of the Arizona State Department of Commerce), the greatest revenues to the area are a result of tourism, retirement, government, schools, retail and construction. The no grazing alternative would increase the scenic value of the area and has the potential to increase tourist revenue.

3) The NO grazing alternative would provide the best environmental benefits.

The document states that the greatest opportunity for habitat improvement for many plant and wildlife species is the no grazing alternative and would result in improved soil stability and less stream turbidity. The EA also states the “primary benefit of this alternative is that recovery of soils, watershed and riparian conditions would occur.”

If you want to mention the horses ...

The EA impacts almost half of the Heber Wild Horse Territory, but does not specifically discuss

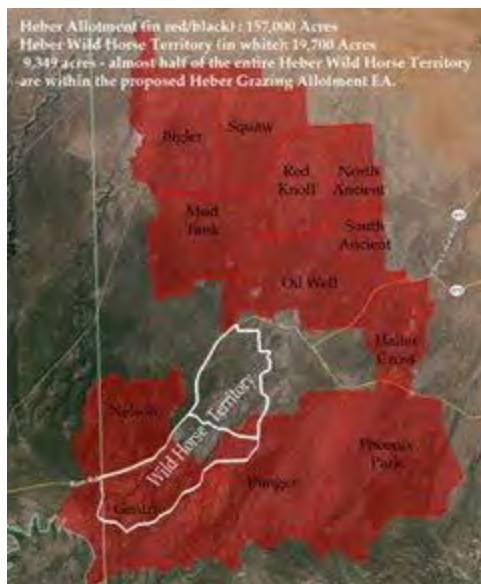
the potential impact from grazing under the new proposal to the wild horses this territory was created to protect.

The Heber Wild Horse Territory was created approximately 42 years ago, yet the Forest Service has never developed a territory management plan to protect the wild horses. In many of the Forest Service documents and proposals written over the years any potential impact to the wild horses is not even discussed. Larry Gibson, who currently manages the cattle owned by Seibert Cattle Company, has publicly stated that he wants every one of the wild horses removed, whether by adoption, euthanasia or slaughter. Federal law mandates that the horses must remain in the territory, but Seibert Cattle Company can graze their cattle anywhere that grazing is allowed in the entire country.

<http://knau.org/.../heber-wild-horses-legendary-or-problematic>

(I encourage you to click on the link above and read the transcript of the 4 minute radio story as well as the comments below the interview.)

Thanks so much for your help preserving the freedom of the magnificent Heber Wild Horses!!! They are so worth the fight!!!! Once these amazing wild horses are gone, they will be gone forever. We cannot let that happen!





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From: [Warr, Victor \(Gus\) A](#)
To: [McClellan, Carey L](#); [Hunter, Chad D](#); [Bastian, Dona A](#); [Carpenter, Dusty L](#); [Weber, Heath D](#); [Bullock, Jessica S](#); [Reid, Lisa](#); [Tweddell, Michael R](#); [Banks, Shayne B](#); [Howell, Tami L](#); [Staheli, Trent I](#); [Reese, Jeffrey M](#); [Reid, Eric P](#); [McKnight, Scott M](#)
Cc: [Schwartz, Kerry L](#); [Briggs, Paul N](#)
Subject: WH&B Monthly Program Call summary
Date: Wednesday, June 12, 2019 11:44:05 AM

FYI ... Here are some bullets from today's call:

- Randy Blasienz with MHF is acting Director since Kali resigned. She reported out 1,453 TIP animals placed this year with another 443 in training, and 326 pending. This doesn't include any new TIP applications or pick up.
- Previously approved helicopter gathers in NV: 3B slated to start 7/8/19 and Pinenut resume on 7/28/19.
- Steve Gibson (OR) with the USFS is on a 30 day detail for their WH&B program, replacing Terry Padilla. The USFS North Hills gather decision was suppose to go out last week, so they anticipate this week.
- Paul Griffin reported that darted use of Gonacon is showing some less favorable results in ND, when compared to hand injections. Reasons unknown, but it's preliminary. Mares after 3 treatment are showing ~35% foaling vs. 0% with hand application. More to come on this.
- **Stefan Ekernas our population survey coordinator is leaving BLM starting July 17th.** Paul Griffin will take over doing the planning, training, etc. Stefan will work with a new person on the number crunching to get them up to speed. The position will hopefully be flown this fall to replace Stefan.
- An RFI for wild horse sterilization will be coming out soon ?, next week.
- **The ability for facilities to enter micro-chip numbers into WHBPS will be a go by this summer, hopefully by August.** Permissions will need to be entered to be able to do this through State Leads (myself).
- **NEW gather schedule has been approved by all but the BLM acting Director. They hope to have that done by this week or early next week, with the schedule out by Wednesday of next week at the latest.**
- July 18 there is a Senate Committee meeting that will question the BLM on the WH&B Program. Possibly to reveal more \$\$\$ for next fiscal year based on the "Path Forward Proposal" that was pushed out by the Congressman Stewart Team.
- Store Front (SF) Program clarification:
 - 2019 Rulebook has new changes - read them. If you don't have them, let me know or go on-line to see it.
 - AIP is NOT allowed for animals at SF facilities.
 - Fee's (going to the SF owner) for animals picked up at Store Front is \$200.
 - Animals adopted at a SF property, gentled or ungentled, entitles the SF owner a payment of \$1,000. This is new from past years. ????

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September 22, 2015

Sent by First Class and Electronic Mail

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Re: Ely District Water Canyon. Antelope Herd Management Area GonaCon Pilot Program



Dear BLM Officials:

I am writing on behalf of the American Wild Horse Preservation Campaign ("AWHPC") concerning the recent decision by the Bureau of Land Management ("BLM") to use the controversial and, as yet, not fully tested GonaCon™ - Equine immune-contraceptive vaccine ("GonaCon") as outlined in the August 18, 2015 Decision Record (DR) for Ely District Water Canyon Wild Horse Growth Suppression Pilot Program Environmental Assessment (EA) DOI-BLM-NV-L20-2015-0014-EA. Although, as explained in detailed comments submitted by AWHPC on June 15, 2015, and hereby attached and incorporated by reference, there are myriad reasons why this "pilot program" violates the Wild Free Roaming Horses and Burros Act ("Wild Horse Act"), 16 U.S.C. § 1331 et seq., and the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 et seq. I write to focus principally on the Proposed Action, which fails even to establish a formal scientific study for this precedent-setting application of GonaCon™ in federally-protected wild horses as a part of this action.

The Proposed Action as outlined in the Decision Record (DR) for Ely District Water Canyon Wild Horse Growth Suppression Pilot Program Environmental Assessment (EA) DOI-BLM-NV-L20-2015-0014-EA would establish a 10-year "Pilot Program" utilizing GonaCon™, which has *never* been used before by the BLM on wild horses. This precedent-setting use of GonaCon™ by the BLM must be conducted in a scientifically responsible manner as outlined by the National Academy of Sciences (NAS), which noted in its June 2013 Report, that "[f]ew data on horses" are available for use of GonaCon and that "GonaCon has not been tested extensively in equids." *Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward* (June 2013) at 7. The Report also concluded that "further **studies on behavioral effects of this product are needed . . .**"¹

We therefore request that the Proposed Action be delayed until the DR and Final EA adequately address the potential impacts on wild horses, and the proposal is revised to establish a formal research study and protocol executed in conjunction with a reputable scientific institution. The current Proposed Action involves experimenting on America's wild horses without any scientific oversight or review, or, for that matter, any scientific method for determining the impacts of the experiments on the horses themselves. Further, the use of GonaCon in this unscientific, unregimented proposal will place in jeopardy the individual horses' long-term well-being and their natural, social behaviors, which are attributes that make wild horses celebrated American icons, treasured by Americans and others around the world.

¹ National Academy of Sciences, "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward," 2003, p. 7.

I. BLM Lacks Sufficient Data on GonaCon™'s Effects to Proceed Without a Formal Scientific Study.

When it comes to use in free-roaming wild horses, GonaCon™ remains at the experimental stage. Hence, not much is known about its long-term safety and efficacy and the impacts to natural wild horse behaviors and natural social behaviors, which are the differentiating factors for these federally-protected animals. In fact, in response to a request from the BLM to review the best science and fertility control alternatives available for use in the BLM Wild Horse and Burro Program, the NAS specifically responded that:

Preserving natural behaviors is important, so GonaCon seems [emphasis] more appropriate for use in females in that some research has **suggested** [emphasis] that female sexual behavior continues. **However, further studies on behavioral effects of this product are needed.**²

A review of research on the use of GonaCon™ reveals the lack of data to support implementation of a "Pilot Program" that does not involve a reputable scientific institution to engage in scientifically rigorous and systematic data collection and analysis. A copy of that review is attached.

The attached analysis reveals that because published research on GonaCon™ in horses is limited, there are remaining questions regarding negative impacts to pregnant mares (association with abortion when given in early stages of pregnancy), long-term physiological effects, and whether the vaccine is a permanent sterilant or reversible. Even the short-term social/behavior effects are not yet established.

II. The Environmental Assessment is Inadequate

In addition, the Final Environmental Assessment ("EA") for the *Ely District Water Canyon Wild Horse Growth Suppression Pilot Program* fails to adequately describe the proposed action, including specifying the formulation, dosage and application timeline and fails to incorporate the available science and data on GonaCon™ as outlined by the NAS. Thus, the EA fails entirely to adequately analyze the potential impacts of the proposed action on wild horses.

The 2013 NAS review specifically outlined the following Advantages and Disadvantages for using GonaCon™:

² "Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward," NAS, 2013, p. 7

Advantages

- Effective for multiple years
- Sexual behavior exhibited
- Social behaviors not affected in the **single field study**

Disadvantages

- Capture may be needed for hand injection of the initial vaccine and any boosters.
- **Lower efficacy than PZP-vaccine products**, especially after first year.
- Sexual behavior may not be cyclic, inasmuch as ovulation appears to be blocked.
- **Should not be administered during early pregnancy because abortion could occur.**
- **Few data on horses.**

NAS Report at 150 (emphasis added).

Yet the EA states that “[t]his immunocontraceptive vaccine [GONACON] has a longer lasting effect and has been shown to provide multiple years of infertility in several wild ungulate species including horses (Killian et al., 2008; Gray et al., 2010).” Final EA at 16. However, the data available on efficacy are based on only one pen trial involving eight vaccinated mares and 29 free-ranging horses (of which 14 became pregnant). The EA glosses over the lack of science to establish the reversibility rate of the vaccine – meaning whether the vaccine is a permanent sterilant or reversible. The EA then summarily states that “treated animals usually regain fertility,” citing “Powers et al., 2011” – a publication that is not included in the accompanying bibliography.

The BLM’s additional assertion that “GnRH appears to lead to fewer behavioral modifications than PZP in this species in the short term,” is contradicted by available data on the two vaccines. In fact, only one study addresses the behavioral effects of GonaCon™ -- “Behavior of feral horses in response to culling and GnRH immunocontraception” (Ransom, et. al, 2014), and states that it is unknown whether the social behaviors documented in that study were attributed to the vaccine or to the effects of “culling” or removal of horses from the herd.

The EA’s response to AWHPC’s comment regarding GonaCon is also inadequate. AWHPC explained that “GonaCon is an experimental fertility control vaccine that interferes with the production of reproductive hormones, which drive natural behaviors in wild horses. Therefore, GonaCon will alter natural behaviors, and that “The National Academy of Sciences also concluded that “[f]urther studies of its behavioral effects are needed” before GonaCon is used by the BLM.” See AWHPC Comments at 5.

In response, the EA cites only the NAS general conclusion that “Three methods (PZP-22 and SpayVac, GonaCon, and chemical vasectomy) are considered the most promising for

managing fertility in free-ranging horses and burros because they have the fewest and least serious effects on those parameters..." However, the EA *omits entirely* the NAS' conclusion that **"further studies on behavioral effects of this product are needed . . ."** Also absent from analysis, or even mention in the EA, is the NAS Report's discussion of the potential impacts of GonaCon, which, as outlined above, include "lower efficacy" than PZP, alteration of sexual/reproductive behaviors, cause of abortions in pregnant mares if given during early stages of pregnancy, as well as the NAS's conclusion that there are "few data" about the effects of GonCon in horses.

Instead of citing the NAS Report in detail, the EA relies heavily on a paper by Ransom et. al. (2014) on GonaCon use in wild horses in the Teddy Roosevelt National Park. However, that paper is not sufficient evidence of GonaCon's impacts in wild horses, because its study group included just 15 mares (14 mares were eliminated from the study when they became pregnant after receiving the GonaCon vaccine) and because the authors admit that they could not determine whether some impacts observed resulted from the vaccine or the effects of a recent culling (removal) of horses from the herd. Moreover, even the authors of this paper concluded that **"long-term influences of GnRH [GonaCon] remain uncertain."** See Ranson et al., *Applied Animal Behavior Science* 157 (2014) at 91.

In addition, the EA fails to adequately analyze alternative to the Proposed Action, including accurate evaluation of the use of the PZP vaccine (ZonaStat-H) to achieve its population suppression goals. As you know, PZP has been in use in equid species for decades and is well-established as both safe and effective.

In conclusion, the EA fails woefully to analyze the available science and potential impacts of the vaccine on the wild horses in this area, and the data contained in the EA simply do not support the use of this vaccine in a "pilot project" on wild horses outside the bounds of a formal scientific study.

III. An Environmental Impact Statement Is Required

In addition to lacking data to support the adverse impacts of the application of this experimental vaccine in federally-protected wild horses, BLM is required under NEPA and its implementing regulations to prepare an Environmental Impact Statement ("EIS") concerning this action before using this vaccine. NEPA provides that agencies must prepare an EIS for all "major Federal actions significantly affecting the quality of the human environment," 42 U.S.C. § 4332(C), that must consider (1) the "environmental impact of the proposed action"; (2) any "*adverse environmental effects which cannot be avoided*"; (3) "alternatives to the proposed action"; (4) the relationship between "local short-term use of man's environment and the maintenance of long-term productivity"; and (5) "any irreversible and irretrievable commitment of resources" involved in the proposal. *Id.* at § 4332(c)(I)-(v) (emphasis added).

Implementing regulations promulgated by the Council on Environmental Quality ("CEQ") provide that, in determining whether a proposed action may have a "significant"

impact on the environment, and hence require the preparation of an EIS, the agency is to consider a list of enumerated factors, including the degree to which the effects on the environment “are likely to be *highly controversial*,” the degree to which “the possible effects” are “*highly uncertain or involve unique or unknown risks*,” the degree to which the action “may establish a *precedent for future actions* with significant effects,” and whether the action “threatens a violation” of federal law. 40 C.F.R. § 1508.27(b). Further, “[b]oth short- and long-term effects are relevant” to the significance analysis, *id.* § 1508.27(a), as are “[i]mpacts that may be both beneficial and adverse.” *Id.* at § 1508.27(b)(1) (“A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial”). It is well established that the presence of any one of these facts “should result in an agency decision to prepare an EIS.” *Humane Soc’y of the U.S. v. Johanns*, 520 F. Supp.2d 8, 20 (D.D.C. 2007) (quoting *Fund for Animals v. Norton*, 281 F. Supp. 2d 209, 218 (D.D.C. 2003) (“courts have found that the presence of one or more of [the CEQ significance factors should result in an agency decision to prepare an EIS]” (other citations omitted)).

Here, there can be no legitimate doubt that BLM's decision to use GonaCon in a “pilot program” implicates *several* of these significant factors. First, the decision is “highly controversial,” particularly in light of the lack of science available to support this precedent application of this experimental vaccine. It is also highly controversial in the public realm as evidenced by the more than 11,000 email comments the BLM has received in opposition to this Proposed Action.

Second, BLM's Proposed Action clearly involves “possible effects” that are “highly uncertain or involve unique or unknown risks,” 40 C.F.R. § 1508.27(b), as evidenced by the NAS-specific comments on the risks associated with GonaCon™ as well as the conclusions of the recent paper on GonaCon use in wild horses in the Teddy Roosevelt National Park, which concluded that “long-term influences of GnRH [GonaCon] remain uncertain.”

Third, there can be no doubt that the agency's decision here “may establish a precedent for future actions with significant effects.” *Id.* The agency itself describes the Final Environmental Assessment for the use of GonaCon as a “Pilot Program.”

Fourth, because BLM's experimental approach is completely at odds with BLM's obligations under the Wild Horse Act to “protect” these wild horses, to preserve them “as an integral part of the natural system of the public lands,” to manage them in a manner that is “designed to achieve and maintain a thriving natural ecological balance on the public lands,” and to employ management activities “at the minimal feasible level,” 16 U.S.C. § 1533, its decision to use this experimental, highly controversial vaccine on these wild horses also necessarily “threatens a violation” of federal law –yet another of the significance criteria. 40 C.F.R. § 1508.27(b).

Therefore, because *at least four of the significance factors are present here*, and particularly because BLM's chosen management approach represents a radical departure from the way it has dealt with these issues in the past, clearly BLM is required to prepare an EIS before

proceeding with this action.

IV. Conclusion

In summary, the proposed precedent-setting “pilot” application of GonaCon™ in federally-protected wild horses has not been adequately analyzed under NEPA and cannot be justified in the absence of a properly-designed, rigorous scientific study conducted in conjunction with a reputable academic institution. In fact, its use in a “pilot program” is specifically contraindicated by the 2013 NAS Report, which stated definitively that **“further studies on behavioral effects of this product are needed . . .”**

Therefore, we request that the BLM revise the EA to reflect the lack of scientific data on the use of GonaCon and its impacts on wild horses, as well as questions raised about those impacts in both the NAS Report and the 2014 Ransom study. Further, any use of GonaCon that takes place on wild horse herds under the BLM’s jurisdiction must be implemented only as part of a well-designed, rigorously-controlled and documented scientific study conducted in conjunction with a reputable scientific organization.

Utilizing this preferred scientific approach will be beneficial to both the BLM and the wild horses – as the agency will gain important data/research on this experimental vaccine, and the horses will be monitored in a scientific manner to ensure any deleterious behavioral or harmful physiological effects will be scientifically documented and analyzed.

In light of the above, we believe that the agency cannot proceed with the Proposed Action as currently designed. If it chooses to do so, it will be in violation of NEPA and the Wild Free-Roaming Horses and Burros Act, as well as the BLM’s own procedures and policies regarding the first-time use of fertility control vaccines in BLM herds.

Sincerely,



Katherine A. Meyer

Cc: Horst G. Greczmiel, Associate
Director for NEPA Oversight, CEQ



July 13, 2020

Bruce Rittenhouse
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Re: Bureau of Land Management's Implementation of Intra-Uterine Devices in Herd Management Areas Across the West

Dear BLM Officials:

I am writing on behalf of the American Wild Horse Campaign ("AWHC") concerning the recent decision by the Bureau of Land Management ("BLM") to begin implementation of Intra-Uterine Devices ("IUDs") even though they remain unproven as an effective and humane population management tool.¹ There are a myriad of reasons why implementation of an unproven option is inadvisable before proper study is conducted. As such, in short, the BLM must pursue a formal scientific study for this precedent-setting application of IUDs in federally protected wild horses as part of current and future actions.

IUDs have never been used before by the BLM on wild, free-roaming horses. This precedent-setting move by the agency to implement IUDs without first studying and analyzing their effects and effectiveness is irresponsible wild horse management. Instead, the BLM must conduct a scientifically responsible study as noted by the National Academy of Sciences ("NAS") in its 2013 report, that since "IUDs may provoke undue uterine inflammation warrants caution and would **require further testing before application in the field could be considered**. In addition, evidence concerning loss rates of IUDs, especially during copulation, would be needed." *Using*

¹ As outlined in *Nevada Wild Horse Range HMA Wild Horse Gather Plan* (DOI-BLM-NV-S030-2020-0003-EA) and *Swasey HMA Horse Gather* (DOI-BLM-UT-W020-2020-0002-EA).

Science to Improve the BLM Wild Horse and Burro Program: A Way Forward (June 2013) at 130.

The NAS report also noted:

In the late 1970s and early 1980s, the Committee on Wild and Free-Roaming Horses and Burros reviewed the status of contraception, including sterilization, for population control in free-ranging herds. That committee reported on the feasibility of several techniques, including hormone injections for stallions and hormone treatments, intrauterine devices (IUDs), and surgery for mares. It concluded that endocrine contraception in stallions or mares was the most promising approach because **IUDs often dislodged** and surgery was impractical in field conditions (NRC, 1980).

Finally, the report also covered two studies, one on domestic mares and one on feral mares in captivity. The study on feral mares demonstrated that the type of IUD makes a huge difference as some mares did become pregnant.

The authors believed the pregnancies of the IUD-treated mares were **due to loss of the relatively small IUDs**, not to failure of efficacy, because no IUDs were found on ultrasound examination of the pregnant treated mares.

Therefore, we request that the BLM delay any implementation of IUDs until the agency can adequately study, quantify, and address the potential impacts this tool will have on wild horses through a formal research study and protocol executed in conjunction with a reputable scientific institution. Frankly, the current rollout across the West involves experimenting on America's wild horses without any scientific oversight or review, or, for that matter, any scientific method for determining the impacts of the experiments on the horses themselves. As such, the use of IUDs in this unscientific, unregimented proposal will jeopardize the horses' long-term well-being and their natural, social behaviors, which are attributes that make wild horses celebrated American icons, treasured by Americans and others around the world.

I. BLM Lacks Sufficient Data on IUDs' Effects to Proceed Without a Formal Scientific Study

The BLM has yet to conduct a research project on wild horses in order to study and determine what impacts IUDs will have on wild horse health and behavior. Given this, it is clear that the BLM has been proposing a research experiment without scientific oversight on wild horses in the Nevada Wild Horse Range and Swasey Herd Management Area rather than taking time to establish a formal research study first. The agency cannot gather scientific information on these untested methods in the absence of an affiliation with an academic institution, a scientifically

sound and approved research protocol, and approval from an Institutional Animal Care and Use Committee (“IACUC”).

Therefore, because recent proposals have partially described an experiment, the BLM must remove the use of IUDs from the agency’s chosen actions or follow the guidance of the federal Office of Research Integrity which states

An institutional animal care and use committee (IACUC) is required by federal regulations for most institutions that use animals in research, teaching, and testing. The IACUC must approve protocols utilizing animals to ensure that the animals selected for a procedure should be of an appropriate species and quality and the minimum number required to obtain valid research results.

The IACUC must also ensure the “proper use of animals, including the avoidance or minimization of discomfort, distress, and pain when consistent with sound scientific practices.” Because the BLM proposes to implement IUDs even though the management method has not yet been studied in wild horses, there is a strong likelihood that an IACUC could impose changes to the proposed actions. In fact, the agency’s recent proposals were absent of any real detail or explicit protocols for implementation of the IUDs in wild mares. At the very least, when the BLM abandons these management decisions and instead pursues a study, an IACUC will insist on clearly articulated protocols for the implementation and study of IUDs in wild mares.

Until BLM acknowledges that the proposed actions are simply a thinly-disguised and poorly-composed research experiment, and takes action to implement an experiment only as part of a well-designed, rigorously-controlled and documented scientific study conducted in conjunction with a reputable scientific institution, and then receives IACUC approval from that institution, it cannot accurately describe the proposed action or analyze its true impacts. Therefore, the implementation of IUDs as a management tool must be dropped from implementation in wild mares across the West.

II. The Information Included in Recent Environmental Assessments is Inadequate

The BLM admits that it has never before used IUDs to control fertility of wild horses and burros on the range. Instead, the agency relies on dated and unpublished studies conducted under far different conditions than on range management in order to wrongly justify its approach. As such, the recent Environmental Assessments for the Nevada Wild Horse Range (“NWHR”) and Swasey Herd Management Area (“SHMA”) fail to adequately analyze the potential impacts of the proposed actions on wild horses.

Instead of citing the NAS Report in detail, the plans rely heavily on a singular unpublished study from 2019, outside of those discussed and dismissed by the NAS Report as discussed above. However, the 2019 study is not sufficient evidence of IUDs' impacts in wild horses for the simple fact that the findings have not been released. Aside from that obvious hurdle, the study was not conducted in wild horses living on the range. The conditions for an on-range study versus the controlled conditions of a corral are completely different and will arguably reveal entirely different results. The proper scientific course of action following a pen trial is a field study. In fact, this is the process that the BLM has followed with other fertility control methods, including PZP-22 and gelding. Field studies of GonaCon in Teddy Roosevelt National Park have preceded the BLM's use of that method as a management tool. However, here the agency is proceeding to implement IUD's as a management method before the release of results from a pen trial and in the total absence of a field study.

Without a proper on-range study, there is no legitimate way that the BLM can actually answer hard questions such as, but not limited to, the following:

- Will the IUDs stay in place;
- Will the use of IUDs effect band cohesion;
- Will the mares exhibit estrous, if so what behavioral and physical effects will that cause;
- Will the IUDs cause internal effects or harm; and
- How will the IUDs be placed and removed humanely?

At bottom, the analysis thus far fails woefully to acknowledge the need for further study before IUDs can even potentially be implemented as a management tool.

III. An Environmental Impact Statement Is Required

The BLM must prepare an Environmental Impact Statement ("EIS") for the proposed study and implementation of IUDs in herds across the west. Indeed, several of the National Environmental Policy Act ("NEPA") "significance" factors are triggered by the proposed use of IUDs, although the presence of only one significance factor *requires* preparation of an EIS. *See Pub. Citizen v. Dept. of Transp.*, 316 F.3d 1002, 1023 (9th Cir. 2003) ("If the agency's action is environmentally 'significant' according to any of these criteria [set forth in 40 C.F.R. 1508.27], then DOT erred in failing to prepare an EIS."); *Humane Soc'y of the U.S. v. Johanns*, 520 F. Supp. 2d 8, 20 (D.D.C. 2007) (explaining that "courts have found that the presence of one or more of [the CEQ significance] factors should result in an agency decision to prepare an EIS") (citations omitted); *Fund For Animals v. Norton*, 281 F. Supp. 2d 209, 218 (D.D.C. 2003) (same).

The following significant factors are triggered here. Accordingly, the BLM is required to prepare an EIS on the extreme proposed implementation of IUDs before adequate study.

- **40 C.F.R. § 1508.27(b)(4)** - This factor addresses “[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial.”

“Controversy in this context does not mean opposition to a project, but rather a substantial dispute as to the size, nature, or effect of the action.” *Hillsdale Environmental Loss Prevention, Inc. v. U.S. Army Corps of Engineers*, 702 F.3d 1156, 1181 (10th Cir. 2012). The BLM cannot credibly assert that the proposed use of IUDs will not be controversial for several reasons. Chief among them is that significant scientific controversy over the proposed use of IUDs already exists, as many of its effects are unknown.

Further, IUD research is extremely limited and unpublished. As such, there are important remaining questions regarding what behavioral and physical impacts the IUDs will have on wild free-roaming mares. This proposed management tool is unprecedented, untested, and highly controversial – both scientifically and socially. Finally, the BLM cannot ignore the findings of the 2013 NAS report, which the agency itself commissioned and funded. In short, there is much scientific controversy that already surrounds the proposed implementation of IUDs.

- **40 C.F.R. §1508.27(b)(5)** - This factor addresses “[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.”

In recent EAs, the BLM has considered this new, controversial and untested approach of implementing IUDs. Undoubtedly, there is an inherent level of uncertainty and unknown risk in the proposed use of unproven IUDs in wild, free-roaming horses. IUDs have not been studied on a wild herd of horses on the range. Instead, the BLM seems to believe that miniscule amounts of anecdotal, unpublished evidence are enough to clarify any uncertainty, but this is simply not the case. Much is still unknown about the long-term safety, efficacy, and impacts to wild horse behaviors and natural social behaviors when IUDs are used. In short, it is clear that the use of IUDs has highly uncertain or unknown impacts that the BLM must first comprehensively study before it can implement IUDs widely as a management tool.

- **40 C.F.R. §1508.27(b)(6)** – This factor addresses “[t]he degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.”

With the recent proposed actions, the BLM is adopting a new approach that could set a precedent for how future actions proceed in numerous regards, importantly among them the potential use of

IUDs as a population management tool before research documenting the behavioral, physical, and environmental effects is conducted and completed.

In both the NWHR and SWMA EAs, the BLM failed to adequately analyze how IUDs will affect wild horse management, any negative effects experienced by the wild horses after implementation, any behavioral changes, etc. The BLM cannot move forward and implement this supposed management tool without any consideration for at least how that tool has or has not worked on wild, free-roaming horses. In short, and besides being counter to scientific recommendations, the implementation of IUDs could set dangerous precedent for management of federally protected wild horses across the west.

In sum, an EIS is required when even *one* of these factors is implicated. Because at least *three* significance factors are triggered here, it is wholly inconsistent with NEPA and its regulations for BLM to prepare only an EA for actions that seek to implement IUDs as a population management tool. Therefore, it would be a patent NEPA violation if BLM refused to prepare an EIS to analyze and study IUDs in wild, free-roaming horses.

IV. Conclusion

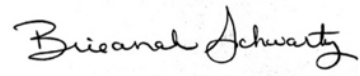
In summary, the proposed precedent-setting rollout of IUD implementation in federally protected wild horses across the west has not been adequately studied or analyzed under NEPA and cannot be justified in the absence of a properly-designed, rigorous scientific study conducted in conjunction with a reputable academic institution. In fact, its use before study is specifically contradicted by the 2013 NAS Report, which stated definitively that IUDs “**require further testing before application in the field could be considered.**”

Therefore, we request that the BLM revise its plans in recent and pending NEPA actions to reflect the lack of scientific data on the use of IUDs and their unknown impacts on wild horses, as well as questions raised about those impacts. Further, any use of IUDs that takes place on wild horse herds under the BLM’s jurisdiction must be implemented only as part of a well-designed, rigorously-controlled and documented scientific study conducted in conjunction with a reputable scientific organization or institution.

Utilizing this preferred scientific approach will be beneficial to both the BLM and the wild horses – as the agency will gain important data and research on this experimental tool, and the horses will be monitored in a scientific manner to ensure any deleterious behavioral or harmful physiological effects will be scientifically documented, analyzed, and addressed.

In light of the above, we believe that the agency cannot proceed with this new strategy for fertility control in wild horses across the west as currently proposed. If it chooses to do so, it will be in violation of NEPA and the Wild Free-Roaming Horses and Burros Act.

Sincerely,

A handwritten signature in black ink that reads "Brieanah Schwartz". The signature is written in a cursive style with a large initial 'B'.

Brieanah Schwartz, Esq.
Government Relations and Policy Counsel
American Wild Horse Campaign
brieanah@americanwildhorsecampaign.org



National Survey Results

Q1 Currently in the United States, wild horses are protected under federal law and slaughtering them is prohibited. Some in Congress are trying to overturn this ban to allow for mass slaughter of wild horses. Do you want Congress to continue the ban on horse slaughter OR overturn the ban and allow the slaughter of wild horses?

<i>Want Congress to continue the ban on horse slaughter</i>	75%
<i>Want Congress to overturn the ban and allow the slaughter of wild horses</i>	18%
<i>Not sure</i>	7%

Q2 By unanimous Act of Congress, wild horses and burros living on Western public lands have been protected as historic symbols of American freedom for nearly 50 years. But now, some in Congress propose to eliminate this protection, allowing for mass slaughter of more than 90,000 wild horses and the sale of wild horses to foreign slaughterhouses for human consumption. Do you think Congress should continue to protect wild horses from slaughter, or do you think we should end protections and allow slaughter of America's wild horses?

<i>Prefer continuing protection of America's wild horses from slaughter</i>	80%
<i>Think we should end protections and allow slaughter of America's wild horses</i>	15%
<i>Not sure</i>	6%

Q3 A 2013 study by the National Academy of Sciences concluded that administering birth control to wild horse herds provides an effective, humane and cost-effective way to manage America's wild horses. Nevertheless, some members of Congress want to abolish humane birth control as a method for controlling wild horse populations. This will increase current program costs for US taxpayers, and lead to the sale and slaughter of wild horses. Would you support or oppose the use of humane wild horse birth control programs instead of slaughtering wild horses?

<i>Support the use of humane wild horse birth control as a means of controlling America's wild horse population</i>	76%
<i>Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population</i>	15%
<i>Not sure</i>	9%

Q4 If your member of Congress were to support a measure that would allow the mass killing of wild horses and unrestricted sales of wild horses to foreign slaughterhouses, would you be less likely or more likely to support them, or would it not make a difference?

<i>Less likely</i>	65%
<i>More likely</i>	12%
<i>Wouldn't make a difference</i>	15%
<i>Not sure</i>	8%





Q5 Regardless of your position on horse slaughter, what do you think is the best reason for Congress to continue to protect wild horses: they're national symbols of freedom and part of the history of the American West; there's a proven, cost-effective and humane way to manage them; slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong; management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter; or something else?

<i>They're national symbols of freedom and part of the history of the American West</i>	41%
<i>There's a proven, cost-effective and humane way to manage them</i>	24%
<i>Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong</i>	12%
<i>Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse slaughter</i>	9%
<i>Something else</i>	10%
<i>Not sure</i>	4%

Q6 In the election for President, did you vote for Republican Donald Trump, Democrat Hillary Clinton, Libertarian Gary Johnson, Green Party candidate Jill Stein, or someone else?

<i>Donald Trump</i>	44%
<i>Hillary Clinton</i>	45%
<i>Gary Johnson</i>	3%
<i>Jill Stein</i>	1%
<i>Someone else</i>	7%

Q7 If you are a woman, press 1. If a man, press 2.

<i>Woman</i>	53%
<i>Man</i>	47%

Q8 If you are a Democrat, press 1. If a Republican, press 2. If an Independent, press 3.

<i>Democrat</i>	43%
<i>Republican</i>	32%
<i>Independent</i>	24%

Q9 If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

<i>Hispanic</i>	9%
<i>White</i>	74%
<i>African-American</i>	12%
<i>Other</i>	5%

Q10 If you are 18-45 years old, press 1. If 46-65, press 2. If older than 65, press 3.

<i>18 to 45</i>	34%
<i>46 to 65</i>	36%
<i>Older than 65</i>	30%





	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Continue or Overturn Ban on Horse Slaughter						
Want Congress to continue the ban on horse slaughter	75%	78%	73%	70%	83%	58%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	14%	20%	13%	17%	38%
Not sure	7%	8%	7%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Congress Continue or End Protections for Horses						
Prefer continuing protection of America's wild horses from slaughter	80%	86%	77%	70%	83%	58%
Think we should end protections and allow slaughter of America's wild horses	15%	9%	17%	13%	17%	38%
Not sure	6%	5%	6%	17%	-	4%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Horse Birth Control Support/Oppose						
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	74%	82%	56%	83%	52%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	15%	10%	15%	17%	40%
Not sure	9%	11%	7%	29%	-	8%

	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hanson	Jill Stein	Someon- e else
Representative Support Horse Slaughter Less/More Likely						
Less likely	65%	69%	65%	35%	68%	45%
More likely	12%	9%	10%	13%	17%	41%
Wouldn't make a difference	15%	15%	16%	17%	15%	7%
Not sure	8%	7%	8%	35%	-	7%



	Base	2016 Vote				
		Donal- d Tru...	Hillary Clint...	Gary Jo- hnson	Jill Stein	Someon- e else
Best Reason to Protect Horses						
They're national symbols of freedom and part of the history of the American West	41%	51%	34%	17%	9%	35%
There's a proven, cost-effective and humane way to manage them	24%	20%	31%	8%	74%	5%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	13%	27%	-	6%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	7%	10%	18%	-	8%
Something else	10%	8%	8%	21%	17%	33%
Not sure	4%	3%	4%	9%	-	14%

	Base	Gender	
		Wom...	Man
Continue or Overturn Ban on Horse Slaughter			
Want Congress to continue the ban on horse slaughter	75%	80%	68%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	12%	25%
Not sure	7%	8%	7%

	Base	Gender	
		Wom...	Man
Congress Continue or End Protections for Horses			
Prefer continuing protection of America's wild horses from slaughter	80%	86%	72%
Think we should end protections and allow slaughter of America's wild horses	15%	9%	21%
Not sure	6%	5%	6%

	Base	Gender	
		Wom...	Man
Horse Birth Control Support/Oppose			
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	84%	67%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	9%	21%
Not sure	9%	7%	11%

	Base	Gender	
		Wom...	Man
Representative Support Horse Slaughter Less/More Likely			
Less likely	65%	69%	61%
More likely	12%	12%	12%
Wouldn't make a difference	15%	10%	21%
Not sure	8%	10%	7%

	Base	Gender	
		Wom...	Man
Best Reason to Protect Horses			
They're national symbols of freedom and part of the history of the American West	41%	45%	36%
There's a proven, cost-effective and humane way to manage them	24%	25%	24%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	13%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	7%	10%
Something else	10%	8%	14%
Not sure	4%	4%	4%

	Base	Party		
		Democr...	Republic...	Independe...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	75%	76%	72%	76%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	16%	19%	20%
Not sure	7%	9%	9%	4%

	Base	Party		
		Democr...	Republic...	Independe...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	80%	79%	81%	78%
Think we should end protections and allow slaughter of America's wild horses	15%	13%	14%	20%
Not sure	6%	8%	5%	3%

	Base	Party		
		Democr...	Republic...	Indepe...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	76%	78%	73%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	15%	13%	18%
Not sure	9%	10%	9%	9%

	Base	Party		
		Democr...	Republic...	Indepe...
Representative Support Horse Slaughter Less/More Likely				
Less likely	65%	62%	67%	68%
More likely	12%	13%	10%	13%
Wouldn't make a difference	15%	16%	14%	14%
Not sure	8%	10%	9%	5%

	Base	Party		
		Democr...	Republic...	Indepe...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	41%	37%	49%	37%
There's a proven, cost-effective and humane way to manage them	24%	24%	23%	26%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	14%	11%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	9%	6%	10%
Something else	10%	10%	7%	15%
Not sure	4%	5%	4%	3%

	Base	Race			
		Hispani-c	White	African-Americ...	Other
Continue or Overturn Ban on Horse Slaughter					
Want Congress to continue the ban on horse slaughter	75%	70%	76%	71%	66%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	27%	16%	25%	19%
Not sure	7%	3%	8%	4%	16%



	Base	Race			
		Hispanic	White	African-American...	Other
Congress Continue or End Protections for Horses					
Prefer continuing protection of America's wild horses from slaughter	80%	78%	83%	67%	67%
Think we should end protections and allow slaughter of America's wild horses	15%	20%	12%	30%	15%
Not sure	6%	2%	6%	3%	18%

	Base	Race			
		Hispanic	White	African-American...	Other
Horse Birth Control Support/Oppose					
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	63%	82%	56%	58%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	33%	10%	29%	21%
Not sure	9%	4%	8%	15%	21%

	Base	Race			
		Hispanic	White	African-American...	Other
Representative Support Horse Slaughter Less/More Likely					
Less likely	65%	48%	71%	43%	51%
More likely	12%	23%	6%	36%	19%
Wouldn't make a difference	15%	18%	16%	8%	16%
Not sure	8%	12%	7%	12%	15%





	Base	Race			
		Hispanic	White	African-American...	Other
Best Reason to Protect Horses					
They're national symbols of freedom and part of the history of the American West	41%	52%	39%	46%	31%
There's a proven, cost-effective and humane way to manage them	24%	13%	27%	15%	21%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	15%	12%	8%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	1%	10%	7%	6%
Something else	10%	11%	8%	24%	19%
Not sure	4%	8%	4%	-	13%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Continue or Overturn Ban on Horse Slaughter				
Want Congress to continue the ban on horse slaughter	75%	63%	83%	77%
Want Congress to overturn the ban and allow the slaughter of wild horses	18%	28%	12%	14%
Not sure	7%	9%	4%	9%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Congress Continue or End Protections for Horses				
Prefer continuing protection of America's wild horses from slaughter	80%	67%	86%	85%
Think we should end protections and allow slaughter of America's wild horses	15%	27%	10%	7%
Not sure	6%	6%	4%	8%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Horse Birth Control Support/Oppose				
Support the use of humane wild horse birth control as a means of controlling America's wild horse population	76%	73%	74%	82%
Oppose the use of humane wild horse birth control as a means of controlling America's wild horse population	15%	22%	14%	8%
Not sure	9%	6%	12%	10%

	Base	Age		
		18 to 45	46 to 65	Older than ...
Representative Support Horse Slaughter Less/More Likely				
Less likely	65%	60%	66%	69%
More likely	12%	15%	11%	10%
Wouldn't make a difference	15%	19%	13%	13%
Not sure	8%	7%	9%	9%





	Base	Age		
		18 to 45	46 to 65	Older than ...
Best Reason to Protect Horses				
They're national symbols of freedom and part of the history of the American West	41%	35%	35%	53%
There's a proven, cost-effective and humane way to manage them	24%	28%	23%	21%
Slaughtering America's iconic wild horses to supply horsemeat for human consumption in foreign markets is morally wrong	12%	11%	15%	9%
Management of wild horses on public lands should be determined by the will of the American people who strongly oppose horse s...	9%	2%	15%	8%
Something else	10%	17%	7%	7%
Not sure	4%	6%	4%	2%





We the undersigned are joining together in calling on the U.S. Forest Service to amend the plan to round up hundreds of wild horses from the Heber Wild Horse Territory and instead implement a comprehensive, humane PZP fertility control program to sustain the current population.

The Forest Service's plan sets the Appropriate Management Level (AML) of just 50-104 wild horses on 19,700 acres. Even at high AML, that's one horse for every 394 acres! This range is far too low to maintain a self-sustaining, genetically viable population of wild horses in the Territory.

With the new AML wild horses are provided just 600 Animal Unit Months while cattle are permitted 5,730 Animal Unit Months to graze within the Territory. Thus, the Forest Service must adjust livestock use in the Territory in order to give wild horses their fair share of the resource.

The last population survey in the Territory found that many of the horses were outside of the Territory boundary. Instead of immediate removal, the Forest Service should make every effort to relocate those horses within the boundary.

The plan provides for fertility control to be used to control the population growth rate of the horses in the Territory. The Forest Service must consider how:

- (1) the use of these options will impact the health of the herd when the population is maintained at such a small population.
- (2) PZP has over 30 years of proven efficacy and should be the preferred tool for use in the Territory.
- (3) IUDs have not been proven humane or effective in wild, free-roaming herds and should be eliminated from further analysis.

Finally, the Heber wild horses have been the target of illegal hunting since 2018. The Forest Service must work harder to protect these federally protected wild horses from harm and to find the person(s) responsible.

Sincerely,

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