



# Animal Welfare Institute

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The BLM should forgo the proposed gather of wild horses at the Little Book Cliffs Wild Horse Range for a concerted effort into humane fertility control of the historic herd. The BLM has the chance to advance an established immunocontraceptive darting program and put in place a comprehensive darting plan with this well-documented population. Instead, the removal of half the herd through helicopter roundups and a multi-year removal plan risks horse safety, damages complex herd dynamics, and places further stress on an already overwhelmed holding and adoption system.

There is a clearly defined opportunity for the BLM to make an impact through immunocontraceptive fertility control in the Little Book Cliffs. While PZP fertility control has been utilized in the Little Book Cliffs since 2002, in recent years it has been unfairly left to a small number of volunteers, who are effectively doing the BLM's job in managing the horses. According to the Friends of the Mustangs, over the past ten years, 4-20 mares have been treated each year, with even fewer horses receiving fertility control in recent years. If population goals have not been reached, this is not a failure of the fertility control, the work of the partner group, or the herd. It is a clear demonstration that support is necessary from the BLM to achieve darting goals. Considering the extensive documentation and knowledge that already exists in the Little Book Cliffs, BLM has an opportunity to build upon a well-established program and expand PZP application in the area.

Colorado law supports the further development of immunocontraceptive programs for wild horse herds. The Colorado Wild Horse Project (SB23-275) specifically mentions fertility control 17 times, and the Colorado Wild Horse Working Group, a diverse group of stakeholders, is available to consult on developing an updated fertility control management plan in the Little Book Cliffs. This legislation and working group is intended to support the implementation of more humane and long-lasting wild horse management, and should be a collaborative partner in better solutions.

The proposal wrongly eliminates the alternative solution of exclusively using field darting to manage the horses, citing "inherent difficulties" such as being too time-intensive, covering too large an area, and being too challenging to perform annually. Contrary to these assertions, the Little Book Cliffs represents an area of massive potential for a concerted darting effort. The proposal states that darting of wild horses typically works in small areas with acclimated horses. However, consider Nevada's 300,000 acre Virginia Range, where darting coverage exceeds 70% (Schulman et al., 2024). It is reasonable to believe that the 38,192 acres of the Little Book Cliffs could be managed by a team of darters—compensated for time, vehicle wear, and mileage—and BLM personnel.

Darting in the Little Book Cliffs, instead of relying on removals, would also represent massive cost savings. Each dose of PZP costs around \$30, compared to the \$48,000 lifetime cost of one wild horse in holding (Bureau of Land Management, 2018). Even when considering manpower and hours invested, PZP presents a cost-saving opportunity over roundups and removals. The price of holding horses is only set to increase, and with over 60,000 horses already in holding, costing \$109 million in FY2023, cost-saving fertility control programs must be considered.

If they are to avoid the holding system, the proposed removal of 120 horses represents 120 more horses that need to find safe homes. The BLM should work with Friends of the Mustangs and other Colorado HMA partner groups to find caring homes for these horses, if they are removed.

The EA proposes that IUDs may be used in the management of Little Book Cliffs horses. The use of flexible Y-shaped IUDs on wild horses is largely unproven, undocumented, and unpublished, save the Oklahoma State study of 20 horses kept in human care (Holyoak et al., 2021). IUD implantation for the Little Book Cliffs horses is unnecessary, extraneous, and should not be considered.

In conclusion, the BLM should reconsider the multi-year roundup and removal plan of the Little Book Cliffs horses, and instead should prioritize a comprehensive PZP immunocontraceptive fertility control program. With a state working group supportive of expanding fertility control, available funding for the cause, and a well-established program foundation, the BLM could be poised for success in pursuing such a plan.

Tessa Archibald, M.S.

Equine Policy Associate, Animal Welfare Institute

Manager, Homes for Horses Coalition

Email: [Tessa@awionline.org](mailto:Tessa@awionline.org)

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