

Appendix A

Summary and Discussion of Public Comments

Comment Categories

On June 7, 2024, the BLM issued a scoping letter for this proposed wild horse gather. A total of 1,033 scoping comment letters were received from individuals, organizations, and agencies through BLM's ePlanning website. All comment letters were reviewed, and BLM identified the following comment categories: AML / TNEB; conflicts with livestock; conflicts with wildlife; financial costs and socioeconomics; health, safety and humane treatment of wild horses; helicopter gathers and bait trapping; land swaps and other alternatives; NEPA compliance; off range corrals and pastures; population growth suppression strategies; population surveys, population growth rates; private land rights; public viewing of wild horses; rangeland health; RMP amendment; wildland fire; genetics; Herd Management Area Plans.

On March 31, 2025, the BLM released the Environmental Assessment (EA) for a 30-day public review period. The BLM received a total of 2,138 comments from the public regarding the EA. BLM reviewed all public comments, and made changes to the EA and this appendix, as needed, to properly respond to public feedback.

Summary and Discussion of Public Comments

This section provides a summary and discussion of the public comments by category.

AML / TNEB

Comments under this category were associated with established Appropriate Management Levels (AML) and meeting a Thriving Natural Ecological Balance (TNEB). See the Glossary for definitions of these terms.

Summary of Public Comment

- BLM must make an excess determination prior to removing wild horses from the range.
 - The excess determination must consider data such as: forage utilization, ecological condition, actual grazing use, climatic data, population inventories, the presence of wild horses outside designated HMAs and the results of any associated Land Health Assessments.
 - BLM must show a failure to meet the criteria for a thriving natural ecological balance, and that wild horses are the primary causal factor, before declaring wild horses to be excess.

- How can wild horses be in excess now, after they've occupied these areas for many years?
 - Wild horses cannot be zeroed out on their "Ranges" (which includes Herd Areas) unless they are termed excess.
 - To determine excess, monitoring data must show that wild horses are causing resource damage and not other animals (such as livestock).
- The AML's for these area should be re-evaluated.
 - The BLM should re-establish AML's for this area, and not manage for zero wild horses.
 - The AML was established by an RMP Amendment that is currently under litigation.
- The proposed action could lead to the extinction of wild horses.
- Will the BLM gather wild horses that are outside HMA boundaries.

BLM Response

- BLM's excess determination is provided in Section 1.2 of the EA, which explains, among other things, why wild horses must be removed from the Herd Areas to preserve and maintain a thriving natural ecological balance and multiple-use relationship in those areas.
- In Section 1.3 of the EA, under Decision to be Made, the BLM explains why decisions regarding retaining wild horses within these Herd Areas is beyond the scope of this EA.
- Impacts associated with managing these areas for zero wild horses are provided in the FEIS associated with the 2023 RMP Amendment (BLM 2022).
- The entire project area is outside HMA boundaries. All wild horses within the project area are excess and must be removed (see Section 1.2 of the EA). That said, the BLM's excess determination is not based on solely on established AML (which, in this case, is zero). As explained in Section 1.2 of the EA, it is also based on the conclusion that wild horses remaining in the Herd Areas would impair the BLM's ability to preserve and maintain a thriving natural ecological balance and multiple-use relationship in those areas

Conflicts with Livestock

Comments under this category expressed concerns with conflicts between wild horses and livestock grazing on public lands.

Summary of Public Comment

- Wild horses cause more impacts to the range than livestock do.
 - Wild horses clip grasses closer to the ground.
 - There is little dietary overlap between sheep and wild horses.
 - Livestock operators develop water to improve animal distribution on the range.
 - Livestock operate within a season of use established by their grazing permit. Wild horses graze year-round.
 - Livestock are primarily herded in the project area, due to the lack of fences. Wild horses are not herded.
 - Wild horses can negatively impact sage-grouse.
- Livestock cause more impacts to the range than wild horses do.
- The BLM needs to provide data regarding livestock use in the project area.

- If wild horses must be removed from the range, then livestock should be removed as well.
- BLM must not allocate AUMs from wild horses to livestock.
- BLM must utilize the criteria provided in 43 CFR 4719.5(a) to remove livestock from the project area, to make room for wild horses.
- If BLM removes wild horses from the project area, then livestock operators may start using a higher percentage of their permitted AUMs, leading to increased impacts to the land.
- The EA lacks any mention of livestock contributing to degraded riparian conditions and only focuses on the impacts wild horses have had on riparian conditions. The BLM should provide the specific evidence related to riparian conditions.

BLM Response

- Sections 3.2 and 3.3 of the EA provide a discussion of the positive and negative impacts wild horses have on vegetation and soil resources.
- In Section 1.3 of the EA, under Decision to be Made, the BLM explains why decisions regarding retaining wild horses within these Herd Areas is beyond the scope of this EA.
- Section 3.4 of the EA describes the amount of livestock use that occurs within the project area.
- In Section 2.3 of the EA, the BLM considers an alternative that would remove or reduce livestock within the project area. That alternative was eliminated from detailed analysis.
- Nothing in the current proposed action, or in the 2023 RMP amendment, allocates additional forage to livestock. Any forage allocation decisions in the future would require additional NEPA documentation, and the associated public involvement.
- Any assumptions regarding what livestock operators may do in response to the removal of wild horses is purely speculative. The BLM does not analyze potential impacts associated with speculative activities.
- Providing detailed information regarding riparian or rangeland conditions is beyond the scope of this EA. That type of information is more appropriate for a Land Health Evaluation.

Conflicts with Wildlife

Comments under this category expressed concerns with conflicts between wild horses and wildlife.

Summary of Public Comment

- Removing wild horses can negatively impact other species of flora and fauna.
- Wild horses may not exclude other wildlife species at water sources.
- Wild horses can negatively impact sage-grouse habitat, as indicated by several scientific studies.
- Removing wild horses would lead to increased occurrences of Chronic Wasting Disease for elk and deer populations.
- The following endangered species could be at higher risk from livestock impacts than they would be from wild horse impacts: Black-footed Ferret, Canada Lynx, Grizzly Bear, Northern Long-eared Bat, Preble's Meadow Jumping Mouse, Yellow Billed Buckoo, Kendall's Warm Springs, Dace, Wyoming Toad, Blowout Penstemon, Dessert Yellowhead, and Western Glacier Stonefly.

BLM Response

- Sections 3.2 and 3.3 of the EA describes the positive and negative impacts wild horses can have on vegetation and soil resources.
- Section 3.5 of the EA describes the impacts wild horses have on big game crucial winter range.
- Section 3.6 of the EA describes the impacts wild horses have on sage-grouse habitat.
- Section 3.7 of the EA describes the impacts wild horses have on raptors and migratory birds.
- The BLM consulted with the US Fish and Wildlife Service regarding endangered species as part of the Land Use Planning Process for the 2024 RMP Revision (BLM 2024). This considered potential impacts to endangered species from a variety of sources, including wild horses and livestock. None of the endangered species listed in public comments are present within the project area.

Financial Costs and Socioeconomics

Comments under this category were related to the financial and socioeconomic costs associated with the alternatives.

Summary of Public Comment

- Wild horses can attract tourism, which contributes to the local economy. Removing all wild horses from this area could negatively impact the local economy.
- Helicopter roundups are very expensive.
- Holding wild horses in off-range corrals is very expensive.
- Costs are much lower if wild horses are managed on the range.

BLM Response

- Impacts associated with managing these areas for zero wild horses are provided in the FEIS associated with the 2023 RMP Amendment (BLM 2022).
- The specific costs associated with various aspects of the BLM's wild horse program (such as off-range corral and pasture holding costs, gather costs, etc.) are legislative and program-wide policy matters beyond the scope of the action analyzed in this EA. The legislative process determines how government agencies receive funding, and how that funding is obligated. The BLM makes decisions based on its evaluation of impacts and assessment as to which action will best meet its multiple use mission. For these reasons, program costs are not included in the analysis in this EA. Information on the costs associated with BLM's wild horse program can be found at the following website: <https://www.blm.gov/programs/wild-horse-and-burro/about-the-program/program-data>.

Health, Safety and Humane Treatment of Wild Horses

Comments under this category were associated with concerns related to the health, safety and humane treatment of wild horses.

Summary of Public Comment

- Helicopter gathers can stress wild horses and cause negative health impacts.
- Gathering wild horses in extreme heat can be dangerous for the horses.

- Gathering wild horses during the foaling season can be dangerous for foals.
- The Comprehensive Animal Welfare Plan (CAWP) needs to be followed during all gather operations.
- More stringent standards should be adopted to provide additional protection to wild horses during gather operations.
- Holding wild horses in close proximity to each other can lead to the spread of sickness and disease.
- The stress of capture and captivity can put wild horses on a path of deterioration, physically and mentally.
- The CAWP should be updated to include current veterinary standards for heat Index and Air Quality Index.

BLM Response

- In conducting all wild horse gathers BLM follows a set of best management practices to protect the health and safety of wild horses. [PIM 2021-002](#) establishes policy for the Comprehensive Animal Welfare Program (CAWP). BLM follows this policy in all operations to ensure wild horses are treated humanely. BLM's CAWP is provided in Appendix D.
- The CAWP restricts gather operations when temperatures are below 10°F or above 95°F.
- The impacts to wild horses associated with gathers, transportation and holding are provided in Section 3.1 of the EA.
- The CAWP was last updated in 2021 and includes the latest guidance to ensure wild horses are handled humanely. Making changes to the CAWP is beyond the scope of this document.

Helicopter Gathers and Bait Trapping

Comments under this category were related to the use of helicopter gathers and bait trapping.

Summary of Public Comment

- Helicopter gathers are cruel for wild horses.
- Helicopter gathers have deleterious effects on wild horses, both physically and mentally.
- It is against BLM policy to do helicopter gathers during the foaling season.
 - BLM needs to define a site specific foaling season using site specific data.
- Helicopter gathers can separate foals from their mares.
- Running wild horses long distances with a helicopter is dangerous for foals.
- Foals risk being trampled during helicopter gathers.
- The BLM must hold its annual helicopter hearing before conducting any helicopter gathers.
- If helicopters are used, BLM should adopt more stringent standards to reduce the impact of the operation to wild horses.
- Helicopter gather operations can negatively impact recreational hunting activities, if they overlap with the open season for a particular area.

BLM Response

- The impacts helicopter gather operations have on wild horses are provided in Section 3.1 of the EA. Impacts to foals are included in this section.
- Section 2.2 of the EA explains that gather operations would not occur during the peak foaling season, March 1 – June 30.
- The CAWP (see Appendix D of the EA) provides guidance on safe and human guidelines for gathering wild horses by helicopter.
- The BLM holds its annual helicopter hearing prior to the start of gather operations each year.
- The impacts helicopter gather operations have on recreational hunting are discussed in Section 3.8 of the EA.

Land Swaps and Other Alternatives

Comments under this section were related to the possibility of a land swap within the checkerboard land ownership pattern area, or other alternatives to the proposed action.

Summary of Public Comment

- The BLM should consider an alternative that would involve a land exchange to allow wild horses to remain on the land.
- The BLM should consider an alternative where they would use eminent domain to allow wild horses to remain on the land.
- The BLM should consider an alternative to relocate wild horses from the project area to other Herd Areas, Existing HMAs or newly created HMAs.
- The BLM should consider an alternative that would reestablish the former HMAs within the project area.
- The BLM should consider an alternative that would relocate wild horses removed from this area to native American reservations.
- The BLM should consider an alternative that would exclusively use bait and water trapping, and would not use helicopter gathers.
- The BLM should consider an alternative that would use fertility control to manage the wild horse population.
- The BLM should consider an alternative that would control wild horse numbers by natural means.
- The BLM should consider an alternative that would remove younger wild horses while leaving older animals on the range.
- The BLM should consider an alternative that would involve only conducting small removals.
- The BLM should consider an alternative that would remove or reduce the number of livestock permitted within the project area.
- The BLM should consider an alternative that would require private landowners to fence their private land in the checkerboard, and BLM would retain wild horses in the area.
- The BLM should consider an alternative that would remove fences, and take other actions to improve habitat for wild horses in the area.
- The BLM should consider an alternative that would modify the 2013 consent decree to allow for wild horses to remain in the area.

- The BLM should analyze an alternative that would include the creation of a Herd Management Area Plan as part of this process.
- The BLM should consider a “No Action” Alternative.
- The BLM should consider an alternative that establishes this area as a wild horse sanctuary.
- The BLM should consider an alternative that makes the checkerboard a conservation area.
- The BLM should analyze an alternative that would require landowners to give consent to the presence of wild horses on their private land, in exchange for being issued a grazing permit on public lands.

BLM Response

- In Section 1.3 of the EA, under Decision to be Made, the BLM explains why decisions regarding retaining wild horses within these Herd Areas is beyond the scope of this EA.
- Section 2.3 of the EA provides information regarding all alternatives that were considered but eliminated from detailed analysis.
- Alternative I in the EA is the “No Action” alternative, and analyzes the impacts associated with taking no action at this time.

NEPA Compliance

Comments under this category were associated with actions commenters requested the BLM take to comply with the National Environmental Policy Act of 1969 (NEPA).

Summary of Public Comment

- The EA must include the positive impacts wild horses have on resource values.
- The BLM must analyze the physical and mental impacts that gather operations will have on wild horses, including short-term and long-term impacts.
- The BLM must disclose cumulative impacts associated with removing wild horses from the project area.
- The EA should disclose the impacts livestock have on resource conditions.
- The BLM must explain how the agency can perform a defensible “alternative actions” analysis as required by NEPA, if no alternatives are reasonably contemplated or possible considering the administrative position BLM is in due to the RMP Amendment.
- BLM needs to present detailed analysis of the HMAs that will be impacted, what BLM will do to minimize impacts, and what alternatives can be considered to minimize negative impacts to wild horses.
- The BLM should analyze the impacts to cultural and historic resources because wild horses in these herds are part of the historical and cultural fabric of the American West, and they are iconic symbols of American freedom and resilience. Their presence in these areas contributes to the cultural identity and historic narrative of the region.
- BLM must include an analysis of current conditions.
- Climate related changes and impacts must be included in the EA.
- The interests of organizations and their members represents an aspect of the “human environment” which the BLM must consider in the NEPA document.

- The EA must disclose the number of citizens who oppose the proposal vs those who support it.
- The BLM should provide the public with the same access to the process that is provided to the Rock Springs Grazing Association.
- The BLM needs to explain why other alternatives didn't meet the purpose and need, when elimination of all herds is not the purpose or need.
- The BLM should collaborate with Indigenous communities regarding the removal of wild horses.
- NEPA requires the BLM to assess reasonable alternatives to their proposed action, even if those alternatives would require amending a land use plan.
- The purpose and need of the EA is crafted too narrowly to preclude any alternatives that would retain wild horses in the project area.

BLM Response

- Both the positive and negative impacts that wild horses have on resource values are provided in the EA (see Sections 3.2 and 3.3).
- The impacts to wild horses from gather operations are discussed under Section 3.1 of the EA.
- The BLM considered past, present and reasonably foreseeable future actions in conducting the analysis presented in the EA.
- Sections 3.2 and 3.3 of the EA provide a discussion of the positive and negative impacts wild horses have on vegetation and soil resources.
- In Section 2.3 of the EA, the BLM considers a wide variety of alternatives that were not analyzed in detail, for a variety of reasons. See that section of the EA for more details.
- The BLM does not manage wild horses as a cultural or historical resource value. In Section 1.7 of the EA the BLM explains why issue statements related to cultural and historical values were not analyzed in detail.
- Throughout the EA the BLM provides information regarding current resource conditions under the "Affected Environment" portion of each issue statement.
- Analysis of impacts related to climate change are not necessary to make a reasoned choice between alternatives. Greenhouse gas emissions from the analyzed alternatives would be very minor and similar between all alternatives. This is because no alternative would dramatically affect the number of animals present on the Earth that could contribute greenhouse gases to the atmosphere. Additionally, any greenhouse gasses associated with any gather operations would be de minimis.
- BLM's NEPA Handbook defines human environment as follows: "includes the natural and physical environment and the relationship of people with that environment. When economic or social effects and natural or physical environmental effects are interrelated, then the analysis must discuss all these effects on the human environment (40 CFR 1508.14)." The analysis provided in the EA meets the requirements of NEPA in relation to the human environment.
- NEPA is not a voting process, and the BLM does not collect votes on issues. NEPA is a public communication and disclosure process. BLM has met the requirements of NEPA in completing the EA.
- The Rock Springs Grazing Association is considered a member of the public, from a NEPA perspective. Therefore, they did not have additional access to the NEPA process beyond what all members of the public received.

- Section 1.3 of the EA provides the purpose and need for the current action. In Section 2.3 of the EA the BLM explains the rationale for why certain alternatives were considered but not analyzed in detail.
- Section 4.0 of the EA describes how the BLM coordinated with Native American Tribes regarding the proposed wild horse gather.
- 43 CFR 1610.5-3 requires that “All future resource management authorizations and actions, as well as budget or other action proposals to higher levels in the Bureau of Land Management and Department, and subsequent more detailed or specific planning, shall conform to the approved plan.”
- Analysis of alternatives related to land use plan decisions (such as adjusting AML or changing the RMP to allow for wild horses to remain in the project area) are beyond the scope of this implementation level document.
- The Purpose and Need for the current action (see Section 1.3 of the EA) is different from the Purpose and Need for the RMP Amendment (BLM 2022). Specifically, the purpose and need for the RMP Amendment involved determining which lands would continue to be managed as HMAs; whereas, the purpose and need for the current action is to remove excess wild horses from areas that are no longer designated for the long-term management of wild horses. The Purpose and Need provided in Section 1.3 of the EA is appropriate for the current action.

Off Range Corrals and Pastures

Comments under this category are related to concerns about storing wild horses in off range corrals and pastures.

Summary of Public Comment

- The treatment of wild horses in off-range corrals is inhumane.

BLM Response

- While the program-scale decision to use off range corrals and pastures for wild horses is beyond the scope of this NEPA analysis, the EA includes a discussion of the associated impacts in Section 3.1.2. The BLM has established best management practices (see [PIM 2021-002](#)) to ensure the health and safety of wild horses in off range corrals and pastures. These include isolating sick horses, and utilizing veterinarians to care for sick or injured horses, as well as vaccinating and deworming wild horses kept in off range corrals (see [IM 2015-070](#)).

Population Growth Suppression Strategies

Comments under this category expressed concern with the use of population growth suppression strategies, such as spaying, sex ratio skewing and other fertility control strategies.

Summary of Public Comment

- The BLM should use population growth suppression strategies to eliminate the need to remove wild horses. Special consideration should be given to PZP.

BLM Response

- The use of population growth suppression strategies was considered but eliminated from detailed analysis (see Section 2.3 of the EA).

Population Surveys and Population Growth Rates

Comments under this category are related to the results of aerial wild horse population surveys and associated population growth rates.

Summary of Public Comment

- BLM needs to disclose how population counts were obtained. Estimates should not be used.
- BLM's population inventory data is questionable.
- BLM's use of a 20% population growth estimate is inaccurate.
- The BLM should count foals as adults for purpose of population estimates.
- The BLM should not count foals as adults for purpose of population estimates.
- The BLM should conduct a post gather census.

RMP Response

- Information on the most recent population surveys, and any associated population estimates, are provided in Section 1.1 of the EA.
- Section 2.2 of the EA explains that an estimated 3,371 wild horses will be removed over the course of the multi-year gather operation. However, it acknowledges that actual numbers may be different than estimated, so a range of 2,500 to 5,000 wild horses is given. Overall, all wild horses will be removed from the project area over multiple years.
- Arguments over how foals should be counted primarily apply to gathers that involve maintaining wild horses within established AMLs. For this gather, all wild horses will be gathered, and how foals are counted toward AML is not relevant.
- Decisions regarding a post gather census are beyond the scope of this EA.

Private Land Rights

Comments under this category were related to private land rights associated with wild horse management, as provided for in Section 4 of the WFRHBA.

Summary of Public Comment

- BLM must recognize the requirements of Section 4 of the WFRHBA in all decisions made regarding wild horses in the Wyoming Checkerboard.

BLM Response

- The requirements of Section 4 of the WFRHBA are acknowledged in Sections 1.1, 1.2, 1.3 and 1.4 of the EA.

Public Viewing of Wild Horses

Comments under this category are related to concerns with reduced opportunities to view wild horses within these Herd Areas.

Summary of Public Comment

- Viewing of wild horses in this area is a tourist attraction to the state.
- The BLM must disclose how removing wild horses from the project area will impact their ability to view wild horses in the area.
- The BLM should site traps so that they are visible to public that observe gather operations.
- Members of the public should be able to see all gather, removal, holding and transportation activities.
- The BLM should utilize cameras mounted on helicopters and other gather related equipment to provide a better view for the public to observe gather operations.

BLM Response

- Impacts to wild horse viewing opportunities are discussed in Section 3.8 of the EA.
- In Section 2.2 of the EA, the BLM states “The BLM would provide the public and media with safe and transparent visitation at wild horse gather operations in accordance with [IM 2013-058](#). To protect spectators, workers and the wild horses only authorized personnel would be allowed on site during the removal operations. Designated visitor areas will be established at each trap site to allow spectators to view the gather operation from a safe location.”
- Impacts associated with managing these areas for zero wild horses are provided in the FEIS associated with the 2023 RMP Amendment (BLM 2022).

Rangeland Health

Comments under this category are related to potential impacts of wild horses and livestock on rangeland health.

Summary of Public Comment

- Wild horses provide some ecosystem benefits, including: opening up groundwater through digging activities, breaking open frozen springs, uncovering feed when snow is present, adding moisture and nutrients to the soils, spreading seeds, managing vegetation growth, aerate soils, promote healthy plant growth, preventing the overgrowth of vegetation near water sources, mitigate fire risk, etc.
- Wild horses are a keystone species for the ecosystem.
- Wild horses have a smaller impact on the range than livestock.
- Wild horses have a larger impact on the range than livestock.
- Wild horses remove more forage on a per capita body mass than cattle or sheep, wild horses reduce shrub cover, areas grazed by wild horses have a greater abundance in annual invasive grasses, etc.
- Wild horses mitigate the effects of climate change by consuming dry brush.

BLM Response

- The positive and negative impacts wild horses have on vegetation communities and soils are discussed in Sections 3.2 and 3.3 of the EA.

RMP Amendment

Comments under this category are related to the 2023 RMP Amendment for wild horses.

Summary of Public Comment

- The RMP amendment that designated the project area as Herd Areas managed for zero wild horses is currently under litigation and may be invalidated. No action should be taken until the courts rule on the legality of this RMP Amendment.
- The RMP should be amended again to reinstate the HMAs with appropriate AMLs.

BLM Response

- As described in Section 1.1 of the EA, the BLM approved a Record of Decision for an RMP amendment related to wild horses in 2023 (BLM 2023). This Record of Decision was challenged in Wyoming District Court. In 2024, the District Court affirmed BLM's decision. The decision is currently being considered by the 10th Circuit Court of Appeals. However, to this point the Record of Decision has not been enjoined, or otherwise set aside. Therefore, it represents BLMs current management plan for wild horses in the project area. Furthermore, BLM is required to remove wild horses from private land in the checkerboard, as per Section 4 of the WFRHBA (see Section 1.3 of the EA). For these reasons, the BLM is moving forward with implementing the 2023 Record of Decision.

Wildland Fire

Comments under this category are related to the relationship between wild horses and the potential ignition of wildfires.

Summary of Public Comment

- How would the removal of all wild horses from the project area affect the potential for wildfire ignition in the area?

BLM Response

- Impacts associated with managing these areas for zero wild horses are provided in the FEIS associated with the 2023 RMP Amendment (BLM 2022).

Genetics

Comments under this category were associated with concerns regarding the loss of certain genetic characteristics that are present in these herds.

Summary of Public Comment

- There is a unique type of wild horses present in the project area, the curly mustang. Curlies are rare and should be preserved in this area.
- Removal of all curlies from this area will prevent future scientific studies regarding this rare genetic characteristic.

- The project area also contains Morgan and Standardbred horses. The genetic characteristics associated with these breeds should be preserved in this area.

BLM Response

- Section 1.7 of the EA provides information on why the BLM did not analyze in detail an issue regarding the genetic characteristics of these herds.

Herd Management Area Plans

Comments under this category are related to the creation of Herd Management Area Plans within the project area.

Summary of Public Comment

- The BLM needs to complete Herd Management Area Plans before it can move forward with any gather operations in the project area.
- Herd Management Area Plans should consider mitigation measures in the project area, including alternatives to removing wild horses from the area.

BLM Response

- The regulation that requires the preparation of a Herd Management Area Plan (43 CFR §4710.3-1) specifies that these plans are to be prepared for HMAs. It does not require that they be prepared for Herd Areas that are managed for zero wild horses. Most of the roles attributed to Herd Management Area Plans (such as consideration of alternatives to manage wild horses in the area) were satisfied by the land use planning process that resulted in the 2023 RMP Amendment (BLM 2023).
- Moreover, federal courts have made clear that, even in areas where Herd Management Area Plans are required under 43 CFR § 4710.3-1, the BLM is not prohibited from completing gathers prior to completing a Herd Management Area Plan.

References

- BLM. 2022. Proposed resource management plan amendment and final environmental impact statement for wild horse management for the Rock Springs and Rawlins Field Offices. Bureau of Land Management, Wyoming State Office, Cheyenne, Wyoming. March 2022.
- BLM. 2023. Record of decision and approved resource management plan amendment for wild horse management for the BLM Rock Springs and Rawlins Field Offices. Bureau of Land Management, Wyoming State Office, Cheyenne, Wyoming. May 2023.
- BLM. 2024. Record of decision and approved resource management plan for the Rock Springs Field Office. Bureau of Land Management, Washington DC. December 2024.