



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
High Desert District - Rock Springs Field Office  
280 Highway 191 North  
Rock Springs, Wyoming 82901-3447  
[www.blm.gov/wy](http://www.blm.gov/wy)



**Decision Record**  
**Bureau of Land Management**  
**Rock Springs Field Office**

**Gather Plan to Remove Excess Wild Horses from Herd Areas**  
**Previously Designated as Herd Management Areas**

**DOI-BLM-WY-D040-2024-0101-EA**

**Background**

On May 8, 2023, the Bureau of Land Management (BLM) issued a Record of Decision and Approved Resource Management Plan Amendment (<https://eplanning.blm.gov/eplanning-ui/project/2009946/510>) that reverted the entirety of the Great Divide Basin and Salt Wells Creek HMAs to Herd Areas, managed for zero wild horses. Additionally, the Record of Decision reverted a portion of the Adobe Town HMA to a Herd Area, to be managed for zero wild horses. The BLM has determined that all wild horses located within the portions of these former HMAs that reverted to Herd Areas are now excess and must be removed from the range in accordance with the Wild Free-Roaming Horses and Burros Act (WFRHBA). In addition to this, the BLM has received a written request to remove wild horses from private lands within the project area.

A portion of the Adobe Town HMA was retained for the management of a wild horse herd, with an Appropriate Management Level (AML) of 259 – 536. This portion of Adobe Town is managed by the BLM Rawlins Field Office. Concurrent with the wild horse gather on these Herd Areas, the Rawlins Field Office is planning a wild horse gather to low AML on the portion of Adobe Town that is managed as an HMA. That gather operation is separate and not directly related to this Proposed Action. More information regarding the Adobe town HMA wild horse gather may be found on the project website: <https://eplanning.blm.gov/eplanning-ui/project/2037060/510>.

**Summary of Proposed Action**

Under the Proposed Action the BLM will gather and remove all wild horses from the project area. The primary gather method will be helicopter drive trapping; however, helicopter assisted roping and bait trapping may also be used. Gather operations are anticipated to start in July 2025 but may start later. Gather operations would continue until all wild horses are removed from the project area, which may span multiple years.

The estimated 2025 wild horse population within the removal area is at least 2,755. However, due to the size of the removal area, and the number of excess wild horses, it is likely that gather operations will involve multiple attempts over multiple years before all excess wild horses are removed from the area. Any wild horses not initially removed from the project area will continue to reproduce, growing the remaining population by approximately 20% annually. Overall, the BLM anticipates that approximately 3,371 wild horses will be removed from these former HMAs once all gather operations are completed and all wild horses are removed from the project area. However, this number could be as low as 2,500 or as high as 5,000.

## **Decision**

Based on the analysis in Environmental Assessment DOI-BLM-WY-D040-2024-0101-EA, it is my decision to implement a wild horse gather, as described in Alternative II (Proposed Action) of the EA. Approximately 3,371 excess wild horses will be removed from Herd Areas that were formerly designated as the Great Divide Basin, Salt Wells Creek and Adobe Town HMAs. Gather operations will begin on or after July 15, 2025. Gather operations will continue until all wild horses are removed from the project area, which may span multiple years. While BLM estimates that a total of 3,371 wild horses will be removed from this area over the course of all gather operations, this number could be as low as 2,500 or as high as 5,000. The BLM will implement all guidelines specified in Section 2.2 of the EA, including utilizing all Standard Operating Procedures provided in Appendix C, and the Comprehensive Animal Welfare Program standards provided in Appendix D.

I have carefully considered all public comments received on the EA and wish to thank all commenters for their interest in wild horse management in the project area.

This decision is issued in accordance with Title 43 of the Code of Federal Regulations (CFR) at section 4770.3(c), which states, in part, “decisions to remove wild horses . . . from public or private lands in situations where removal is required by applicable law or is necessary to preserve or maintain a thriving ecological balance and multiple use relationship shall be effective on issuance or on a date established in the decision.” This decision will be effective upon issuance and the actual gather start date will be subsequently scheduled. The BLM will notify the public through a press release when gather operations will commence.

## **Compliance with applicable laws:**

The proposed action and alternatives were evaluated under the following authorities<sup>1</sup>:

---

<sup>1</sup> Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The BLM verifies that it has complied with the requirements of NEPA, including the Department’s regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President’s January 2025 Order and Memorandum. The BLM has also voluntarily considered the Council on Environmental Quality’s

#### The Wild Free-Roaming Horses and Burros Act of 1971, as amended

Section 3 of the WFRHBA (§1333) requires that when the BLM determines “that an overpopulation exists on a given area of public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels. Such actions shall be taken... until all excess animals have been removed so as to restore a thriving natural ecological balance to the range, and protect the range from the deterioration associated with overpopulation.”

Section 4 of the WFRHBA (§1334) states that “[i]f wild free-roaming horses or burros stray from public lands onto privately owned land, the owners of such land may inform the nearest Federal marshal or agent of the Secretary, who shall arrange to have the animals removed.”

#### The Public Rangelands Improvement Act of 1978

The Public Rangelands Improvement Act of 1978 directs the BLM to facilitate “the removal and disposal of excess wild free-roaming horses and burros which pose a threat to themselves and their habitat and to other rangeland values”.

#### The Federal Land Policy and Management Act of 1976, as amended

In administering the WFRHBA the BLM “may use or contract for the use of helicopters or, for the purpose of transporting captured animals, motor vehicles.”

### **Land Use Plan**

The Proposed Action is subject to and is in conformance (43 CFR 1610.5) with the following land use plans:

- Rock Springs Field Office Resource Management Plan and Record of Decision signed December 20, 2024.
- Rawlins Field Office Resource Management Plan and Record of Decision signed December 24, 2008.

The Proposed Action conforms with the 2024 Rock Springs RMP, which incorporated the 2023 amendment to the previous 1997 Green River RMP. They also conform to the 2008 Rawlins RMP, as amended.

The amendment (BLM 2023) to these RMPs states:

- “The Rock Springs Field Office (RSFO) portion of the Adobe Town HMA will revert to HA status and be managed for zero wild horses. In the Rawlins Field Office (RFO) portion of the HMA, all checkerboard land and the portion of the HMA north of the existing Corson Springs southern allotment boundary fence . . . will revert to HA status

---

rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

and be managed for zero wild horses. The remaining lands (within the RFO) will be retained as an HMA and managed with an AML of 259 – 536.”

- “The entire Great Divide Basin HMA will revert to HA status and be managed for zero wild horses”
- “The entire Salt Wells Creek HMA will revert to HA status and be managed for zero wild horses.”

## **FONSI**

I have determined that the proposed project is in conformance with the approved land use plan. I have reviewed this environmental assessment including the analysis of potentially significant environmental impacts. I have determined that the proposed action with the mitigation measures as identified in the EA will not have any significant impacts on the human environment and that an EIS is not required. It is my decision to implement the proposed action.

## **Public Involvement**

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. Appendix A in the EA provides more detailed information regarding public comments, and BLM’s response.

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 Appendix A, as needed, to properly respond to public feedback.

## **Rationale For Alternative Selected**

After considering a current inventory of the lands within the project area, information contained in the associated Land Use Plans, and additional information currently available, the BLM has determined that all wild horses within the project area are excess and must be removed in compliance with Section 3 of the WFRHBA. Additionally, the BLM has received a request to remove wild horses from private lands within the project area, in accordance with Section 4 of the WFRHBA. After considering numerous public comments, including alternatives proposed by members of the public, the BLM has determined that the best alternative is to remove all wild horses from the project area using a combination of helicopter drive trapping and bait trapping, as described in the Proposed Action in EA # DOI-BLM-WY-D040-2024-0101-EA. BLM’s rationale for not analyzing other alternatives in detail is provided in Section 2.3 of the EA. Overall, the Proposed Action represents the best way to remove all excess wild horses in a safe

and human way, while meeting the requirements of the WFRHBA and complying with the current Land Use Plans for this area.

## **Appeal Procedures**

This decision is issued in accordance with 43 CFR 4770.3(c) which states in part that certain wild horse removal decisions, “shall be effective upon issuance or on a date established in the decision.” Once the decision is final, it will be subject to appeal. If you wish to appeal this decision, as provided by 43 CFR 4770.3 and 43 CFR 4.4, you must file an appeal in writing within 30 days of receipt of this decision with the Field Manager, Rock Springs Field Office, 280 Highway 191 North, Rock Springs, Wyoming 82901.

The appeal must state clearly and concisely why you think the decision is in error.

Should you wish to file a petition for stay, the appellant shall show sufficient justification based on the following standards:

- 1) The relative harm to the parties if the stay is granted or denied.
- 2) The likelihood of the appellant’s success on the merits.
- 3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- 4) Whether the public interest favors granting the stay.

If you decide to also submit a petition for stay of the decision, a copy of the notice of appeal and petition for stay must be served simultaneously upon the parties identified below.

Field Manager

Rock Springs Field Office  
280 Highway 191 North  
Rock Springs, Wyoming 82901

Office of Hearings and Appeals  
Interior Board of Land Appeals  
801 North Quincy Street, Suite 300  
Arlington, Virginia 22203

Office of the Regional Solicitor  
Rocky Mountain Region  
755 Parfet Street, Suite 151  
Lakewood, Colorado 80215

The Office of Hearings and Appeals regulations do not provide for electronic filing of appeals; therefore, they will not be accepted.

---

Kimberlee D. Foster  
Field Manager