

Appendix E-Alternatives Considered but Eliminated from Further Analysis

Closure of HMA to Livestock Use

This alternative was not brought forward for detailed analysis because such an action would not be in conformance with the multiple-use mandate of the FLMPA (1976) and the existing LUP, Challis RMP (1999), which authorizes AUMs for wild horse and for livestock grazing in the allotments within CHMA (Appendix G). Livestock grazing is identified as a major use of the public land and is to be conducted in a manner which will meet multiple-use and sustained yield objectives Challis RMP (1999). Livestock grazing management is designed to achieve standards for rangeland health and conform to guidelines for livestock grazing management (S&G). Current wild horse populations are problematic in managing riparian conditions because they are used as home ranges and receive year-round use. The closure of the HMA to livestock grazing without maintaining wild horse populations within AML would be inconsistent with the WFRHBA (1971) which directs the Secretary to immediately remove excess wild horses. Livestock grazing is reduced or eliminated following the process outlined in the regulations found at 43 CFR Part 4100. This alternative would not achieve the purpose and need.

Complete Removal of Wild Horses from the HMA

Complete removal of wild horses from the CHMA was eliminated from detailed analysis because it would not be in conformance with the Horse Act (1971) nor the multiple-use mandate of FLPMA (1976); this alternative would therefore not achieve the purpose and need of this document. The AML was established through the Challis RMP (USDI-BLM, 1999a) process. The purpose of the RMP is to “*identify resource condition, objectives, land use allocations, and management actions and direction necessary to guide resource management on a long term, sustainable basis during the next 15-20 years*” (USDI-BLM, 1999a). Elimination of wild horses and closure of HMA can only be conducted during the land use planning process or within an RMP revision or amendment; this project is neither.

Bait, Mineral or Live Horse Lure Trapping Only

The use of bait, mineral or live animal lure trapping as the primary or sole gathering method. The use of bait and water trapping, although effective in specific areas and circumstances, would not be cost-effective or practical as the primary gather method for this HMA. However, water or bait trapping may be used as a supplementary approach to achieve the desired goals of alternatives B and C if gather efficiencies are too low using a helicopter or a helicopter gather cannot be scheduled. Water and bait trapping is an effective tool for specific management purposes such as removing groups of horses from an accessible concentration area. The use of only bait and water trapping was dismissed from detailed analysis because much of this HMA has limited road access capable of handling pickups and livestock trailers. The lack of adequate road access would make it technically infeasible to construct traps and safely transport captured wild horses from these areas of the HMA. Due to availability of water only bait and other horses could be used. Water trapping is not considered practical in the CHMA.

Gather by Horseback Drive Trapping Only

Use of horseback-drive trapping to remove excess wild horses can be effective on a small scale (less than 20 horses); but due to the large geographic size of the HMA (154,150 BLM -managed acres), access restrictions (e.g. rough, two-track roads), topography with deep canyons and large open basins and approachability of the horses, this technique would be ineffective and impractical. Horseback-drive trapping is also labor intensive as compared to helicopter-drive trapping. Helicopter-drive trapping would require approximately 7 days to gather this HMA vs. 2–3 months with 5 or more people during horseback-drive trapping. Horseback-drive trapping can also be dangerous to the domestic horses and riders herding the wild horses. For these reasons, this alternative is technically infeasible and was eliminated from further consideration.

Intensive Fertility Control Without Removal

The intent of such an alternative would be to reduce the population growth rate each year, thereby eliminating or reducing the need to remove horses through future bait or helicopter gathers. Although there are specific portions of the HMA where Challis horses are more approachable, most horses are not amenable to humans within one-half mile of them for identification and darting of the fertility vaccine. Darting has been used in the CHMA since 2014 on a limited basis. In 2016, it expanded to include the entire CHMA. On average it takes 4-5 dedicated hours per horse to treat. This has only been effective on a small portion of the CHMA where the horses are most approachable during the late winter. It is likely that the time per treated horse would double or triple in areas where the horses are less approachable. When identifying the most promising fertility-control methods, the NAS (2013) concluded there are HMAs in which remote delivery (i.e. darting) is possible, but these seem to be exceptions. Given the current fertility-control options, remote delivery appears not to be a practical characteristic of an effective population management tool when used alone, but it could be useful in some scenarios (NAS 2013). Access to animals for timely inoculation and other management constraints may affect the utility of fertility control as a management tool for western feral horse populations (Ransom et al. 2011). This alternative does not remove excess horses, or reduce the impact on the environment in the short term. It may take 20 years for the mortality rate to balance with the birth rate; and is only possible, if enough wild horses are treated annually.

Manage the Challis HMA as a Non-reproducing Herd

This alternative would require the entire CHMA to be gathered. A group of 185 horses (90 mares and 95 stallions) would be chosen to return to the HMA. Prior to returning to the HMA all of the horses would be sterilized via colpotomy and castration respectively. These sterile horses would then be released for the non-reproducing population.

The WHB Management Handbook (H-4700-1, 2010) section 4.5.4 explains that selected HMAs may be managed for non-reproducing wild horses to aid in controlling on-the-range population

numbers. Examples of criteria for non-reproducing herds: no special or unique herd characteristics, low ecologic condition, limited public land or water and reliance on private water (section 2.1.3). The CHMA does not fit these being recognized as being highly adoptable, ecologically sound and well distributed water across continuous public land.

This alternative was eliminated from further analysis because it is inconsistent with the basic objectives for the management of the CHMA, and is not in compliance with the Challis RMP (1999a).

Euthanasia or Sale without Limitation

Under the WFRHBA, healthy excess wild horses can be euthanized or sold without limitation if there is no adoption demand for the animals. However, while euthanasia and sale without limitation are allowed under the statute, these activities have not been permitted under current Congressional appropriations for over a decade and are consequently inconsistent with BLM policy. If Congress should remove this prohibition, then excess horses removed from the CHMA could potentially be sold without limitations or humanely euthanized, as required by statute, if no adoption or sale demand exists for some of the removed excess horses. Although the appropriations restrictions could be lifted in future appropriations bills, it would be contrary to Departmental policy to euthanize or sell without limitations healthy excess wild horses.