4740
(N-931.3)

OCT 6 1978

Instruction Memorandum No. NV-79- 8
Expires 9/30/80

To: District Managers, Nevada

From: Associate State Director, Nevada

Subject: Capture and Disposal of Excess Wild Horses or Burros

We want to avoid some of the problems encountered last year at the Palomino corrals which resulted from large numbers of animals held for excessive periods of time. No distribution centers are available for Nevada use at the present time; therefore, our ability to adopt large numbers of animals at this time is very poor.

It will be our policy in Nevada, until further notice, that the number of animals captured and transferred to the Palomino Facility will be in direct relationship to the number placed with cooperators. I believe that approximately 200 horses is the maximum number that should be placed in the facility at this time. This number is subject to upward adjustment for short periods if firm commitments are known or the number reduced accordingly as the situation may dictate.

It is our understanding that Bureau policy instructions have been signed which would normally restrict the adoption by an individual to five animals. This number can be increased upon careful, reliable, and documented screening of the applicant.

/s/ Roger J. McCormack

Distribution
Director (412) 2
SCD (D-531) 3
DM (CA-020) 1

RFerris:mh 10/5/78

4740
(N-931.3)

JUN 21 1978

Instruction Memorandum No. NV-78-166
Expires 9/30/79

To: District Managers, Nevada
NSO Division Chiefs
Acting

From: State Director, Nevada

Subject: Capture and Disposal of Wild Horses/Burros in Nevada

I have made the decision to place the general capture, holding, processing, and disposal of excess wild horses in Nevada under the administrative jurisdiction of the Carson City District. The operational concept of this decision is outlined below; however, complete staffing, facilities, and operations will be dependent upon the funding and manpower allocations for FY 1979 and subsequent years as well as the number of animals which can be placed under the Adopt-a-Horse program.

A. Capture Operations--The capture operations will be centralized at the Palomino Valley facility. This will be accomplished by establishing a team of one foreman and four wranglers to handle all Nevada roundups. Each District Manager requesting a roundup in his District will appoint one liaison to work with the team on-the-ground. Other District personnel may be requested by the team as needed for support. Authority for the capture operation will rest with the Palomino Valley Facility Manager through the Team Foreman. Equipment needs will be met by pooling from all Districts as required. The team will perform only the physical and technical aspects of the roundup. The District liaison and/or District Manager will handle all public/media contacts regarding the operation.

B. Holding/Disposal Operation

1. Organization--The Palomino Valley facility will remain under the jurisdiction of the Carson City District Office, but it will not be placed under an existing division or area. The Facility Manager will essentially be on the same level as an Area Manager and will report directly to the District Manager.

Under these procedures the Districts will retain all existing authority and responsibility for the wild horse and burro program except for the physical and technical aspects of roundup and disposal of excess animals. Authorization to remove excess wild horses or burros must still be approved by the State Director.

Any District desiring to remove excess wild horses/burros, that does not currently have approval to gather, should submit the EAR and supporting justification to NSO for review and approval. The approval will be transmitted to the Carson City District Manager.

I believe the procedure as outlined will improve our efficiency. This is a major Bureau program in Nevada and in order for the program to work, it is absolutely essential that all Bureau employees provide their full support and cooperation.

(SGD) Wm. J. Malencik

Distribution
Director (412) 2
SCD (D-531) 3
DM (CA-020) 1

RFerris:mh 6/21/78

4740
(N-931.3)

JUN 21 1978

MEMORANDUM

To: District Manager, Carson City District (N-030)

From: State Director, Nevada

Subject: Operation of the Palomino Valley Wild Horse Holding Facility

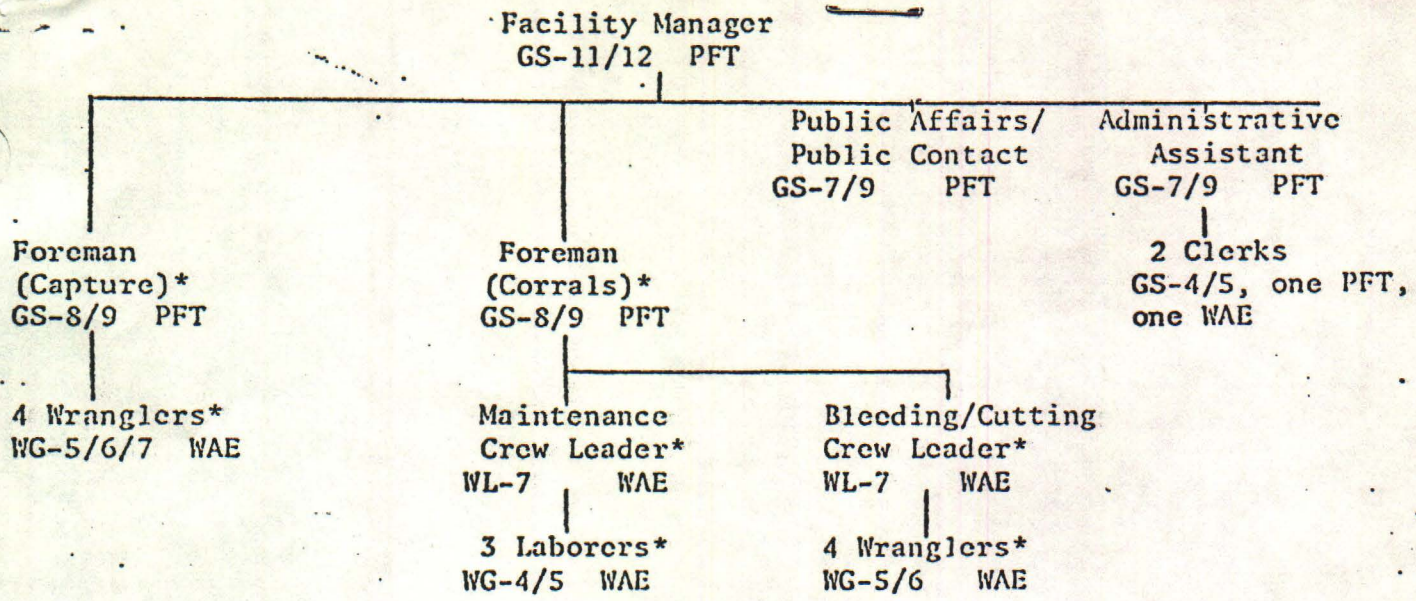
I have made the decision to place the general capture, holding, processing, and disposal of excess wild horses in Nevada under the administrative jurisdiction of the Carson City District. The full operational concept of this decision is outlined below; however, complete staffing, facilities, and operations will be dependent upon the funding and manpower allocations for FY 1979 and subsequent years as well as the number of animals which can be placed under the Adopt-a-Horse program.

A. Capture Operations--The capture operations will be centralized at the Palomino Valley facility. This will be accomplished by establishing a team of one foreman and four wranglers to handle all Nevada roundups. Each District Manager requesting a roundup in his District will appoint one liaison to work with the team on-the-ground. Other District personnel may be requested by the team as needed for support. Authority for the capture operation will rest with the Palomino Valley Facility Manager through the Team Foreman. Equipment needs will be met by pooling from all Districts as required. The team will perform only the physical and technical aspects of the roundup. The District liaison and/or District Manager will handle all public/media contacts regarding the operation.

B. Holding/Disposal Operation

1. Organization--The Palomino Valley facility will remain under the jurisdiction of the Carson City District Office, but it will not be placed under an existing division or area. The Facility Manager will essentially be on the same level as an area manager and will report directly to the District Manager.

2. Staffing--At its full operational level, the staffing for the Palomino Valley facility will be as outlined:



*all personnel interchangeable

3. Facilities--Necessary one-time improvements as outlined below are contingent on increased staffing, removal of 7,000 animals per year, and increased funding covered in the next section. The maximum operational capacity of the corral would be 1,000 head for a short period of time.

One Time Improvement and Expansion of Palomino Facility

Visitor restroom facility	6,000
Sprinkler System	4,000
Cutting chute	5,000
Tack room	5,000
Shelter (lean to)	2,000
Feeders	40,000
Roof over fly chute	1,000
Pipeline from well to corral	1,000
PA system	500
Office space 2000 Sq. Ft. at $35 (modular)	70,000
Landscaping	2,000
View Stand	5,000
Lightning protection	2,000
Perimeter pasture fences	20,000
Contract Administration/Design	16,000
Total	$179,500

4. Funding--To cover staffing, one-time improvements, and expected recurring costs, my decision is to request that the fiscal year 1979 component ceiling (43) for Nevada be raised to $1,080,500.

Recurring Annual Costs		
Hay	170,000	
Aircraft (helicopter rental)	100,000	
Trucking contract	50,000	
Veterinarian	40,000)	
Lab fee	22,000)	--some recoverable
Brand inspection	6,000)	
Medicine	5,000	
Power	7,000	
Telephone	6,000	
Animal maintenance supplies	5,000	
Facility maintenance supplies	6,000	
Manure removal	8,000	
Total		425,000
Staffing at Palomino Valley		
200 man-months X $1700 per man-month		340,000
One-time Improvement and Expansion		179,500
District and State Overhead		
Overhead 80 man-months X $1700 per man-month		136,000
Total		$1,080,500

You should prepare for initial operation under this concept to start with FY 1979; therefore, action should be taken relative to initial staffing, operating plans and IFBs for supplies, equipment and services. NSO will assist you in the planning and implementation of this action.

(SGD) Wm. J. Malencik

RFerris:mh 6/21/78

Acting

4740
(N-931.3)

OCT 3 1978

Instruction Memorandum No. NV-79-4
Expires 9/30/80

To: District Managers, Nevada

From: Associate State Director, Nevada

Subject: Field Destruction of Wild Horses and Burros During Capture Operations

The Division of Wild Horse and Burro Operations in the Carson City District is being formally established. A copy of the proposed Functional Statement is attached for your information. We are also enclosing a copy of the authority from the Director to establish the division. This memorandum also gives considerable direction to the functions which must be retained by the district. These are directly compatible with concept as outlined in Instruction Memo No. NV-78-166, dated June 21, 1978.

During capture operations, only those horses and burros that appear to be suitable for adoption will be transported to Palomino Valley. Pending further instructions the animals not suitable for adoption will be released back onto the range except for those that are seriously sick or injured. These will be destroyed in a humane manner.

It is recommended that at least part of the released animals be neck banded and detailed information relative to sex, age, color, etc. recorded.

This capture policy will apply to all areas where some wild horses or burros will be maintained or remain on the range for an indefinite time frame. On areas where all horses are to be removed, a decision relative to unadoptable animals must be made on a case basis between the district and NSO.

The decision as to whether the horses will be transported to Palomino Valley, released, or destroyed will rest with the Division of Wild Horse and Burro Operations.

/s/ Roger J. McGrath

2 Enclosures (1 to each addressee)
Encl. 1 - Functional Statement
Encl. 2 - Memo from Director

RFerris:jmc:9/28/78

Distribution
Director (412) 2 with encls.
SCD (D-531) 3 with encls.
DM (CA-020) 1 with encls.

Ferris copy
6/78

Nevada BLM
Wild Horse
Committee Report

June, 1978

BUREAU OF LAND MANAGEMENT
WILD HORSE AND BURRO PROGRAM--NEVADA
POSITION PAPER

I. PURPOSE AND SCOPE OF REPORT

This report covers the current and proposed future operations of the wild horse and burro program in Nevada. It presents data on the current operations covering management, removal and adoption of wild horses and burros on the public lands in Nevada. Although burro numbers will be identified, they will not be considered separately in this report. In addition, although total numbers of wild horses for Nevada are shown in the following tables, those listed under the Susanville District are not under Nevada State office responsibility and therefore will not be considered further in this report. To provide boundaries for the discussion, certain assumptions and constraints which limit solutions are also outlined, followed by the work group's findings. The last two sections cover the feasible alternatives and the work group's recommendations.

II. BACKGROUND AND CURRENT SITUATION

When the Wild, Free-Roaming Horse and Burro Act was approved by Congress in 1971, wild horses were considered estrays, or loose, privately owned domestic horses under state law. Until the Federal law was passed, it was legal for Nevada residents to remove the animals for any purpose in any quantity if they had a permit from the county government involved. This way, populations were kept in check. During the same period, the Bureau of Land Management (BLM) was responsible, of course, for range management and allocating forage for wildlife and livestock. Since wild horses were considered to be domestic livestock in trespass, no forage allocations were made. Because of limited manpower, control of the widespread trespass was not accomplished.

At the time the law was passed, there was no reliable count of how many wild horses existed in the state. Some set the figure at 17,000, but there are no firm data to support that estimate.

As the law directed, ranchers and others were allowed to claim their private animals and remove them, as long as supporting evidence, such as brands or accurate descriptions, were provided to support the claim. This portion of the law, to allow the removal of all privately owned animals, believed to be a substantial number, was not generally successful in Nevada. Many ranchers, faced with paying back grazing fees, considered the cost too high and did not claim their private animals. Consequently, only 5,476 animals have been removed so far.

The latest comprehensive survey of wild horses in the state, taken by helicopter in 1975, produced the following estimates by area:

District	Horses	Burros
Elko	3,202	-0-
Winnemucca	7,044	120
Carson City	3,203	111
Ely	2,137	-0-
Las Vegas	2,424	600
Battle Mountain	4,249	11
Total NSO Responsibility	22,259	842
Susanville	(3,158)	(207)
Total Nevada	25,417	1,049

Since that time, recounts have been made in selected areas of the state, showing varying population increases, all averaging about 20 percent per year. As of Sept. 30, 1977 , the estimated populations levels were:

District	Horses	Burros
Elko	1,400	-0-
Winnemucca	10,500	200
Carson City	5,600	192
Ely	3,600	-0-
Las Vegas	4,200	1,030
Battle Mountain	6,500	-0-
Total NSO Responsibility	31,800	1,422
Susanville	(3,750)	(164)
Total Nevada	35,550	1,586

The wild horses and burros were added as a component to the Bureau's land use planning system. Through that system, optimum numbers, based on resource data, the multiple use mix and public opinion, will be established area by area throughout the state.

Although work on these plans was progressing by 1973, the Bureau's commitment to complete 18 environmental statements in Nevada on the impact of livestock grazing due to a court order resulting from a suit filed by Natural Resources Defense Council et al, delayed completion so planning data would be adequate to fully meet the environmental statement requirements.

The current schedule for completion by area is as follows:

Planning Unit	Acres (000)	MFP	ES
Caliente	3,414	6/78	9/79
Paradise-Denio	3,646	3/79	9/80
Reno	681	9/81	4/83
Las Vegas	2,690	3/83	9/84
Elko	3,260	8/83	9/84
Tonopah	4,043	8/83	9/84
Schell	4,183	3/84	9/85
Sonoma-Gerlach	4,555	3/85	9/86
Esmeralda	3,503	3/85	9/86
Fallon	2,422	3/86	9/87
Wells	4,142	3/86	9/87
Walker	1,947	3/87	9/88
Egan	3,826	3/87	9/88
Shoshone-Eureka	4,371	3/87	9/88

Until these management framework plans are completed, reductions are made on a case by case basis, depending on the range conditions. Since the Bureau's first roundup in 1974, the BLM has removed 2,654 horses from critical forage areas. Also some ranchers have taken voluntary reductions of livestock grazing due to range conditions.

Early adoption operations were handled by the district having the roundup. In April, 1977, the BLM purchased about 150 acres in Palomino Valley, 19 miles northeast of Sparks, which had some existing facilities such as corrals and a well, for $59,000 and established a statewide central holding facility. About $35,000 in improvements were added shortly after purchasing the facility. With current manpower, the Palomino facility can handle an optimum capacity of 500 head (700 head under emergency conditions). Additional corral facilities are under construction which would increase the optimum operating capacity to 1,000 head (1,700 head under emergency conditions.) Construction is being accomplished by the Young Adult Conservation Corps. Staffing and other improvements necessary to activate the new corral capacity are not within the current budget.

So far, the facility has handled 2,036 horses. As of May 3, 1978 there were no horses remaining at the facility. Of the total handled, 1,708 have been adopted, and the remainder died of natural causes, had to be destroyed, were estray animals turned over to the state, were released back on the range, or were transferred to the Susanville District for adoption. Average length of stay was four to five weeks, with younger horses being adopted much faster than older ones, particularly older studs, some of which stayed at the corrals for four to nine months.

The current budget situation in Nevada regarding the wild horse and burro program is:

	Dollars	Man-Months
Operating Budget for FY 78*	$495,000	227
Costs Through February	264,800	117
Available 3-1/9-30 (7 months)	230,200	110
Straight Line Projection 3-1/9-30/78	370,700	164
Projected Deficit at Present Level	(140,500)	(54)

*Despite the fact that Nevada has 60 percent of the wild horses in the West, this dollar figure represents 25 percent of the wild horse operating budget distributed to the 10 western states.

III. ASSUMPTIONS AND CONSTRAINTS

The only constraint that the Bureau or Department of Interior don't have control over is the 1971 law. For the purposes of this study, it is assumed that the law will not be changed. However, in the recommendations resulting from this study, certain desirable amendments are noted for consideration.

Even though the law allows destruction of the animals as a means of controlling population, the Bureau and the Department of the Interior have generally adopted a policy that destruction of any animals except sick or lame will not be permitted until Adopt-A-Horse is exploited to the fullest. However, despite the thousands of applications coming into the Denver Service Center, (DSC) Nevada has had to shut down its scheduled roundup operation twice in the last six months because the corrals were filled and some horses were not being adopted within a reasonable period.

Therefore, any discussion of long-term plans for the horse operations in Nevada, unless there is a change in the destruction policy, depends largely on how many horses can be adopted and how fast. Although several suggestions are presented later in this study on how to improve that situation, all other components--capture operations, the Palomino facility, etc. depend on the Bureau's success at getting wild horses adopted.

A third constraint is the planning system. Although optimum figures, ranging from 9,000 to 12,500 wild horses in Nevada, have been discussed, until the land use planning is completed, those are unsupported estimates. Therefore, until the plans are complete and optimum numbers established, any decisions on the wild horse and burro program must be considered interim, particularly numbers of horses that can or should be removed.

IV. FINDINGS

A. General--The wild horses in Nevada are expanding, in most areas, beyond the range's capacity to support them.

Each time a Nevada roundup has been initiated, a detailed environmental assessment record has been prepared. In each case, data strongly indicated range deterioration was occurring at a serious level. Our district managers generally feel many more areas than those where roundups have occurred thus far are in a similar condition. When considering that since 1975, only about 2,500 horses have been removed, and at a 20 percent growth rate, about 7,000 animals will be added in Fiscal Year 1978 alone, the problem becomes evident.

B. Capture Operations--Currently, the district offices handle all operations leading up to and including the actual roundup and transportation to the Palomino facility. Contracts for two ground operation roundups have been let and were partially successful, but now that helicopters are allowed by law, BLM personnel working with a competent helicopter pilot under contract can do the job at about one-third the cost.

Organizationally, the district manager, through the area manager, is in charge of the overall operation. Now that most districts have a wild horse specialist, that individual generally handles the day to day operations of the roundup. Personnel used in the actual roundup varies, ranging from permanent staff to temporary range hands.

Some of the district managers interviewed felt the district-run operation, with a good helicopter pilot, was not difficult, but did concede some time is spent at the beginning of the operations to "learn the ropes." Once that hurdle is passed, effectiveness and success of the operation improves greatly.

One problem with the capture operation is coordination with the central holding facility. If the district is geared up with men and equipment to remove 2,000 horses and if after 1,000 are captured the facility is full, because the animals are not being adopted, the roundup must be shut down unless temporary holding facilities can be found. Even if they are found, they too, will eventually fill up if the adoption is not going well. Therefore, the adoption is the key and a possible insurmountable block to the capture operation. This already has caused problems and if we step up our roundup operations, will inevitably cause more.

Another problem is that special skill is required to efficiently and economically capture animals, either by helicopter or water trapping. Few employees presently possess this skill and the operation improves as a "crew" becomes trained. Large amounts of manpower are wasted when constant training of different employees is required. When permanent or temporary employees are deployed from regular assignments, their skills are temporarily lost to that activity.

Safety is another major factor in this activity. When the number of employees involved is considered, the horse program showed the highest incident and chargeable injury rate of any activity in the state. The accident rate can be improved by use of only skilled and highly trained employees.

Equipment and supply requirements are generally adequate in two districts. Experience has demonstrated that exchange and coordination of equipment between districts is extremely difficult. Under current procedures, equipment for the other four districts would have to be acquired, or a pool/regional sharing concept initiated.

General contract administration has been another problem due in part to monetary limits at the district and NSO level as well as the inability to determine extent of contract needs. This has resulted in questionable fiscal procedures. Only complete coordination and improved planning on a statewide basis can improve the situation and reduce the overall costs.

In talking with all six district managers, three favored retention of the district capture operation, one favored contracting because of expertise and two felt a central, state office operated core roundup team would be preferable as long as there was close coordination with the district during any operations.

C. Palomino Valley Facility--Currently, the Palomino facility is under the Carson City District.

When operations at Palomino Valley began in June 1977, the staff (four WAEs) included a corral foreman, two wranglers and a clerk. Assistance from the district's wild horse specialist and public information officer was also available.

During the summer months, summer temporaries assisted in wrangling, feeding, digging power and water lines, cleanup, fencing and corral construction. About two and a half man-months of temporary help were used during the summer. Another three man-months of temporary help were required during the September-October period.

From October 1 to March 1, 36 man-months of regular and part-time work have been charged to the corral operations. This is equivalent to nine full-time employees.

The facility is currently staffed as follows: a clerk, and five wranglers (three WAE, one - 130 day appointment, and one - 1 year appointment). The district wild horse and burro specialist will also be spending the majority of his time supervising corral operations. A Young Adult Conservation Corps trainee is assigned to the corral office and another four YACCs are feeding animals. Other YACC persons are involved in constructing the corral addition.

In recent months, there have been several complaints about the condition of the facility and the handling of the horses. In surveying the situation the work group found problems were generally centered around lack of trained manpower and facility inadequacy.

These problems resulted in some bad publicity and criticism from several individuals and wild horse groups. The worst period was during a recent series of storms in December 1977 and January 1978, that caused extremely muddy conditions at the corral. This made our veterinarian-advised and economically-necessary method of feeding hay on the ground a serious problem resulting in sand compaction in many animals caused by eating sand and mud along with hay. There was substantial death loss of old and weak animals during this period (91) despite regular veterinary care. Approximately 2,000 linear feet of feeders are needed for 1,000 head and the corrals presently have 140 feet or seven percent of the total needed.

Other problems center around lack of personnel, including the inadequate staffing (at a 500 head capacity) to take blood samples, age, identify and freezemark animals as required, loading animals for adoption, and maintaining facilities. Lack of visitor facilities and directions were also identified, as well as a need for a responsible, on-site manager.

Under our present arrangements, there is no adequate viewing stand for visitors and no system for solid waste disposal (an estimated 3200 cubic yards of manure has accumulated). Public access to restrooms and drinking water facilities are limited and inconvenient. General Palomino facility maintenance also needs more attention. An information display is needed so that visitors' common questions may be answered, avoiding disruption of wranglers' work. There is no adequate means to control corral visitors when the facilities are open daily. Last fall, 100 tons of hay were burned by, presumably, a careless smoker. Public sensitivity to necessary destruction has also created problems. Without controlled access, a visitor can witness what he may consider an "unpleasant" task.

Due to the limited staffing and extremely sensitive nature of the program, the corrals have had public relations difficulties. Visitors demanding answers, climbing on or over fences, and standing in the wrong place at the wrong time have led to frustration, anger and safety hazards to themselves and the corral staff. Certain personnel have been insensitive to public needs which has resulted in complaints. Future staffing should include a public relations position to provide information and assistance to the general public, organized groups and those selecting horses at the corrals. A full-time manager of the operation is needed to insure effective functioning of the corrals and the personnel. The addition of these two positions would insure better efficiency in the work force and lower our public relations problems.

D. Adoptions--As stated in Assumptions and Constraints, under current policy, adoption is the key to the entire wild horse and burro question. Capture can become more efficient with practice and the Palomino facility could be upgraded to handle more horses and under better conditions, but if homes cannot be found for animals and policy is not changed about destruction of older healthy animals, the entire program will be limited to our current adoption rate of about 2,000 head per year.

Currently, all applications are sent to DSC for logging in the computer. If an applicant indicates he/she would like to pick up a horse in Nevada, a letter is sent, advising that horses are available at Palomino Valley and to contact that office to arrange pickup. Although many applications are coming into DSC, in our experience a generally low percentage follow through to actually pick up a wild horse in Nevada. Two examples are:

List A. 2,251 applicants were notified horses were available in Nevada; 108 responses were received; 11 decided to go to some other state; 13 individuals took 31 horses.

List B. 586 applicants were notified horses were available; 24 responses were received, one decided to go to some other state; 12 individuals took 31 horses.

It would appear there is lack of manpower at DSC to process applications quickly and efficiently. Many people tell us they've waited two to three months and never received a letter of availability. Others say they filed applications and yet their names don't appear on the computer.

Causes for the small percentage of follow-through could include:

(1) lack of early information--many applicants are often not aware of what's involved in adopting an animal, i.e. responsibility for picking up the animal, no possibility under current law of receiving title, limitations on uses, what type of animals are involved and limited choice (i.e. most want one year old and younger animals, yet most horses brought in don't fit that category, etc).

(2) lack of action on applications-long delays in processing could discourage many.

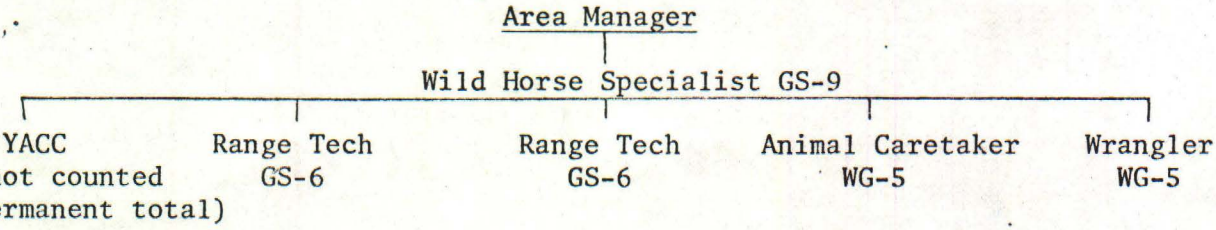
(3) distance--On the application, applicants are free to select what state or states they desire to pick up animals. Most midwestern and eastern applicants would naturally pick the shortest distance, such as Wyoming or Utah and not wish to travel to Nevada. Even if they did mark Nevada along with one or more states, if they were instructed to come to Nevada, a distance of 1,000 or 2,000 miles for many, they might change their minds, especially in the winter.

Since the turndown rate is a problem, that even further emphasizes the necessity for more extensive promotion of the program nationally. Although the Washington office and state offices have been very successful in getting news coverage of the program, the media will eventually tire of the subject as a news story. Better ways are needed to identify the potential so we know what the market is and then find better, more continuous ways to exploit it.

E. Wild Horse Operations in Other States

1. California--Ninety-five percent or virtually all of the wild horse population in California is in the Susanville district. Susanville district currently has a wild horse population of about 4,000 head. Its estimated optimum number is 1,500-2,000. It can currently catch and handle 1,500 head per year.

Five persons are assigned to the wild horse program in one of the resource areas having 75 percent of the district's horses. Organization breakdown is as follows:



Corral capacity is 400 head at one time.

Facilities include a small office and a small working corral with six pastures of five acres each. The fencing is six foot field fence wire with pole top and mud rail.

The district's capture operation is all by helicopter. Generally, 200 hours of flying time are required per 1,500 head capture.

Transportation from roundup to corral is handled by BLM semi truck.

The season of operation is June through December. From January to March the weather is too bad and from April to May is foaling season.

Manure is handled by a pasture system of natural disposal. The district reports no problems with this method.

Animals that must be destroyed are drugged by a veterinarian. The process takes 20-30 seconds. The district reports no problems and no negative public reaction. In an emergency, animals are destroyed by a small calibre handgun shot.

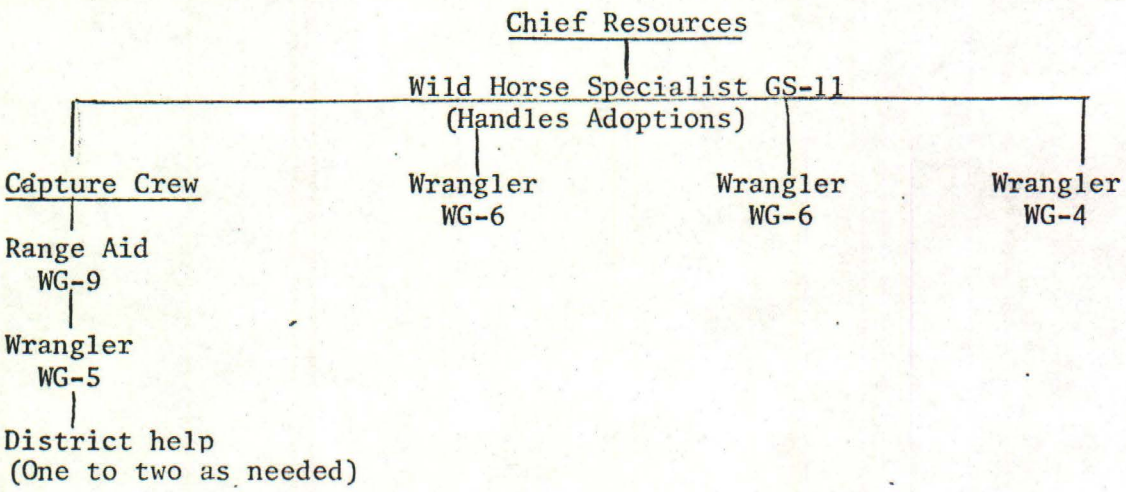
Carcasses are disposed of by burning with diesel fuel in an open pit. No cover is used and the district reports no problems with the public to date.

To deal with older studs, the district has them gelded for $35. So far, half of these have been adopted.

The district reports that its biggest problems are that the adoption market is inadequate; that there's no clear authority to dispose of those animals not adopted; and the prohibition against commercial uses of animals.

2. Oregon--Virtually all the wild horses in the state are in eastern Oregon, primarily in Vale, Burns and Lakeview districts. Population is estimated at 4,050.

Six persons, assigned to the Burns district resources chief, are involved in the program. This is a statewide, centralized adoption center.



Facilities include a 300 foot x 300 foot corral for mares and colts and a 150 foot x 150 foot corral for studs in a tight corral system. Working capacity is 300 head. Occupancy is normally 100-150 head.

The state's capture operations are all done by helicopter. The capture crew consists of three to four men, one-half from the host district and one-half from the Burns core team.

Transportation is by BLM trucks driven by the operations staff.

Manure is handled by temporary stacking near corral, and scattering it on pasture area as needed. The district reports little or no public interest.

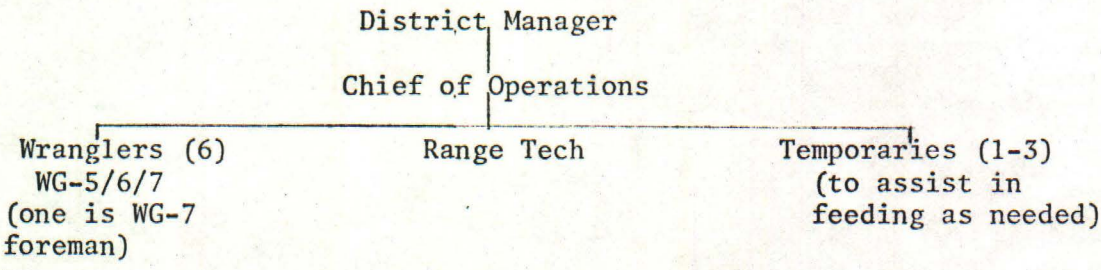
Animals that must be destroyed are shot by a small calibre (.22) gun in the chute. Drugs are not considered effective. However, the district does not allow public access during disposal.

Carcasses are disposed in a BLM pit with lime/earth cover.

As for general public access to the facility, it is limited to hours when fully staffed.

3. Wyoming--Wyoming operates a centralized operation assigned to the operations division, Rock Springs District. Wild horse population is estimated at 9,090 animals statewide.

Seven persons are involved in the wild horse program under the Rock Springs District Manager.



Of these personnel two to three are normally at corral, plus feeders. Three to four are considered the capture crew. The district would like to add one GS-11 coordinator.

Facilities include 10 foot x 100 foot pens for each 50 head. A covered fly chute is included. Holding capacity is 350 head (soon to be expanded to 500 head). Feeding is currently done on the ground, but the district wants to buy feeders.

The Rock Springs district handles capture for the entire state. Ninety percent of capture is done by helicopter.

The capture crew includes two men from the host district plus two men from the Rock Springs center.

Manure is handled by a leachate catch basin. The district reports no problems.

Horses that must be destroyed are drugged, which the district reports is very effective and is administered in a chute.

Carcasses are disposed of in a city land fill and covered with lime.

V. ALTERNATIVES

A. Capture Operations--The work group identified five alternatives that should be considered for future management of this aspect of the program.

1. Leave the capture operation in the district office,

a. Advantages--Three districts that have already conducted roundups have some experienced personnel and adequate equipment. Two district managers strongly felt the operation was a district function and that the core team, no matter how experienced, would cause problems with their operations. As for slow-down time, they felt if this did occur, their personnel could be immediately put back in the district workforce without any problems. Contrasted with the planning work, several district managers felt conducting the roundups gave their staffs a sense of accomplishment, and that morale would suffer if this function was removed. Finally they felt that if management objectives were to be achieved regarding horse numbers, roundups in their districts would be an almost continual operation and a core team or even several core teams couldn't handle it efficiently.

b. Disadvantages--Current or eventual duplication of equipment is an obvious disadvantage of a district by district operation. An additional problem would be the other three districts that have not yet had roundups would have to go through the same "learning" process. Even those districts with experienced personnel would have turnover, and new personnel would have to be trained. It would also result in less flexibility for the entire program and pose potential coordination problems.

2. Operate all Nevada capture operations from the Palomino Valley facility, and leave it under the jurisdiction of the Carson City District Office.

a. Advantages--Better coordination and flexibility of men and machinery would be a definite advantage, as well as the expertise these men would gain through practice. Since the capture operation is so closely tied to the adoption, combining the functions under one entity would provide a smoother, more coordinated operation. Also, if the capture operation was down, the staff would have suitable skills to work at the adoption facility until capture work resumed.

b. Disadvantages--A major disadvantage would be removing a function the other districts felt important and a positive morale factor for their employees. Although the work group is sure that once a decision is made the districts would cooperate, their opposition to the original idea would undoubtedly have an effect on the proposal's success. In addition, there would be a potential coordination problem resulting from the equal organization level of all the district managers involved.

3. Operate all Nevada capture operations from the Palomino Valley facility, but put it under the jurisdiction of the state office.

a. Advantages--Same as #2a.

b. Disadvantages--Same as #2b, except the organization level problem would not exist.

4. Create a centralized one or two man core team at Palomino to be supplemented with two or three district staff, all under the supervision of the Palomino manager.

a. Advantages--Since the district would participate, it would lessen opposition while still preserving the expertise advantage of alternatives 2 and 3. In addition, the district people would have a better knowledge of the terrain than the core team and be better able to deal with on-site problems.

b. Disadvantages--Several of the districts would probably object to detailing their personnel to the Palomino team. If this were so, coordination with the district, essential to this alternative, would be difficult.

5. Create a centralized one or two man core team at Palomino, to be supplemented with two or three district staff, but have the entire team assigned to the host district manager.

a. Advantages--It would lessen district opposition and still preserve some of the expertise and flexibility aspects of earlier alternatives.

b. Disadvantages--It would cause problems for the core team which would essentially be responsible to two people--the Palomino manager and the district manager involved. It would limit the team's flexibility.

B. Holding/Disposal Operations--The alternatives here are basically on three levels. The first is whether or not to leave the Palomino Valley facility under the Carson City District Office or put it under the state office. The second, if it is put under the state office, should it be attached to the division of resources, technical services, or directly to the state director? The third is what level of improvements should be made and what would be the estimated costs?

1a. Leave the facility under the authority of the Carson City District.

(i) Advantages--Five district managers felt such an operation should be a district, not state office function. Carson City District agreed, and wants to keep Palomino, if it is upgraded and a manager hired.

2a. If the Palomino Valley facility is moved to the state office, place it under an appropriate division--either resources or technical services.

(i) Advantages--Such delegation to technical services is consistent with Bureau manual 1213. State office level assignment would likely have advantages in reconciling various inter-district problems. Four district managers favored this delegation if the management of the facility is moved to the state office.

(ii) Disadvantages--Two district managers indicated opposition to this alternative, citing how far down "the totem pole" the Palomino Valley facility would be. They felt the manager should be on the same level as a division chief, since they perceived his responsibility would be similar.

2b. If it is moved to the state office, place it directly under the state director, not a division chief.

(i) Advantages--Since Palomino Valley is such a critical element to the BLM's success or failure in the wild horse and burro program, direct delegation from the state director would assure the operation a higher priority and position of authority in the organization hierarchy. Two district managers favored this alternative.

(ii) Disadvantages--It would not be in strict conformance with accepted state office organizational delegation and would give the state director one more direct line management responsibility. Four districts opposed this alternative.

3a. Continue operating facility at current funding level.

(i) Advantages--This would preclude any efforts to secure funds above current levels. Current capture and holding is reasonably well-matched with our adoption market.

(ii) Disadvantages--The facility is apparently inadequate to support expected numbers of horses to be removed under interim management. Increased roundup activity would put even more pressure on the facility, causing more problems and much more potentially bad publicity.

3b. Make the necessary improvements to handle enough animals each year to maintain the current population level. Since that figure is currently 33,222 (31,800 horses, 1,422 burros) the facility would have to be upgraded to handle 7,000 horses each year, at an optimum operating capacity of 1,000 head at one time (1,700 under emergency conditions). Cost by component breakdown to achieve such a goal is as follows:

Staff of 24* at Palomino Valley

240 man months x $1700 per man month		$408,000
Recurring Annual Costs		
Hay	170,000	
Aircraft (helicopter rental)	100,000	
Trucking contract	50,000	
Veterinarian	40,000)	
Lab fee	22,000)	- - some recoverable
Brand inspection	6,000)	
Medicine	5,000	
Power	7,000	
Telephone	6,000	
Animal maintenance supplies	5,000	
Facility maintenance supplies	6,000	
Manure removal	8,000	
Total		$425,000 *

* This total includes additional staff to handle the capture operations. If the capture responsibility is left with the districts, this figure and therefore total dollars needed would have to be adjusted.

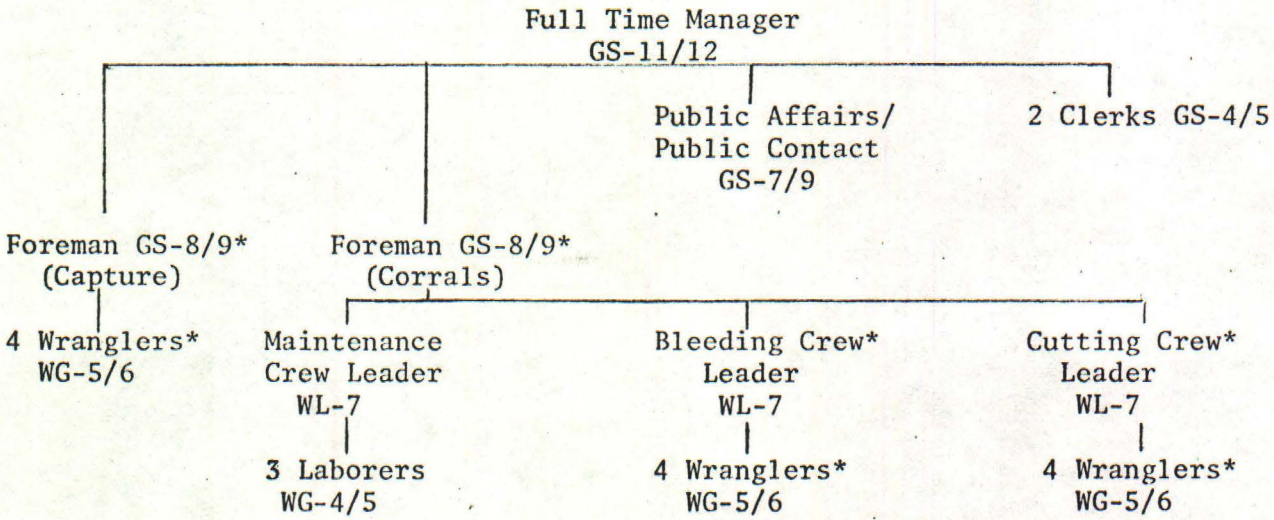
One-time Improvement and Expansion of Palomino Facility

Visitor restroom facilities	6,000
Sprinkler system	4,000
Cutting chute	5,000
Tack room	5,000
Shelter (lean to)	2,000
Feeders	40,000
Roof over fly chute	1,000
Pipeline from well to corral	1,000
PA system	500
Office space 2000 sq. ft. @ $35 (modular)	70,000
Landscaping	2,000
View Stand	5,000
Lightning protection	2,000
Perimeter pasture fences	20,000
Contract Administration/Design	16,000
Total	179,500

District and State Overhead

Overhead 80 man-months @ $1700	136,000
Total Annual Proposed Costs - Wild Horse & Burro Budget	1,148,500
Present 43 component ceiling for FY 78	495,000
Proposed Annual Increase	653,500

Suggested manpower organization would be as follows:



* all interchangeable.

This would require a total of 16 net staff increases above 78 levels. This does not include the time spent at Palomino by various district staff nor YACC help.

(i) Advantages--It would provide sufficient facilities and manpower to handle 7,000 horses a year (perhaps more under optimum conditions), keeping the population stable until optimum numbers could be set. It would also provide definite leadership and responsibility channels. It would also improve public relations aspects of the facility.

(ii) Disadvantages--It would more than double the current Fiscal Year 1978 budget allocation. However, without some solution to allow disposition of the 7,000 captured animals, this alternative would not be practical.

3c. Expand the holding/disposal facilities to handle enough horses to reach the estimated optimum level of 9,000-12,500 animals over a five-year period. An estimated 10,000 animals per year would be involved. If this were the goal, one could theoretically project the necessity for one more facility close to the size of Palomino (which would include the capture operation) under Alternative 3b. or increase Palomino to a 10,000 head capacity. The cost would almost double.

(i) Advantages--It would bring population levels down almost immediately, preventing further damage to an already deteriorating range.

(ii) Disadvantages--The BLM would be predetermining optimum levels in advance of planning system results, which may either support or not support the estimated optimum population. Either way, this would be extremely damaging to our planning credibility. Strong public opposition could be expected, even including court action to stop such a widescale removal plan. Finally, the costs would be extremely high.

C. Adoption--The work group considered two alternatives in the area of adoption: continuing the activity in the same manner or upgrading the program, making it more efficient and faster, researching the possible market and exploiting that market more fully.

1. Continuing the Adopt-A-Horse program in the same manner.

a. Advantages--Little additional time and money would have to be spent.

b. Disadvantages--The current program is operating erratically and producing deterrents for many applicants due to long waits and lost applications. In addition, a high percentage of applicants are not following through to pick up a horse, wasting valuable computer time and effort. Finally, a relatively small number of horses have been placed through the Adopt-A-Horse program so far. The number of horses being removed from the range needing homes is bound to increase dramatically. Statistics indicate if Adopt-A-Horse is handled in the present manner, it could not supply homes for all the horses to be removed, either at the stabilization or optimum levels, effectively posing as a block to the entire program.

2. Stepping up the program would cover the following areas: (a) conducting market research to find out who the potential custodians are, their estimated numbers, where to find them, and what media approach would be best to reach them. (b) either establishing in-house or contract with an advertising/promotion company to develop and implement long-term promotion ideas aimed at reaching that potential custodian public. (c) add whatever personnel is necessary at DSC to handle applications, including initially screening each applicant to make sure they're fully aware of their responsibilities. Log only committed applicants on the list. (d) establish distribution centers nearest the identified market. Make sure all State directors are willing to participate if the target areas are within their area of jurisdiction.

(i) Advantages--It could develop enough applicants to handle all the wild horses removed from the range in the foreseeable future, but even if it did not, it would provide evidence to the public that the BLM did everything it could to make Adopt-A-Horse work.

(ii) Disadvantages--Although the work group was unable to estimate cost, it, undoubtedly, would be substantial.

D. General Policy--Although these two areas are not exactly within the bounds of this study, the work group felt they should be considered. The first is whether or not the Department of Interior should seek changes in the wild horse and burro law to allow transfer of title after a specified period of time. The second is whether or not the Department and the Bureau should change the policy regarding destruction of healthy animals if they are not adopted within a reasonable period of time.

1a. Do not seek legislative changes in the law to allow transfer of title to custodians.

(i) Advantages--It would maintain the status quo.

(ii) Disadvantages--The problems of the U.S. government retaining ownership responsibility for thousands of wild horses all over the country are many. Following up complaints of violations is difficult since Bureau personnel are generally far away from the areas involved. Humane societies, wild horse groups, etc., might be enlisted to help out, but their efforts would be strictly voluntary and couldn't be depended on to any great degree. Legal problems are potentially serious. In addition, the fact that title can never be obtained under current law is definitely discouraging some and possibly discouraging many other potential applicants from taking an animal. However, even if title were secured, it is not known if enough applicants could be found to provide homes for numbers of animals to be removed.

1b. Seek legislative changes to allow title transfer.

(i) Advantages--More people would be willing to take horses and follow-up would be minimal. It could be the only way to significantly improve the adoption market.

(ii) Disadvantages--Once title is transferred, it could be difficult to make sure the animals are not used for commercial purposes. There would probably also have to be some limitation on the numbers of horses to which any one individual could obtain title, or more intensive screening to make sure applicants are not commercially-oriented.

2a. Retain the current policy concerning destruction, that is, that except for very old, sick or lame, maintain all captured horses at the central holding facility until eventually adopted.

(i) Advantages--This action appeases the more extreme protectionist groups and maintains the status quo.

(ii) Disadvantages--Such a policy quickly runs up the cost of the program, eventually fills the corrals with older, undesirable animals, and increases chances of disease. It also effectively restricts capture rates.

2b. Establish a policy that if animals are not adopted within 90 days and all efforts have been made to adopt them, that they be humanely destroyed. (Note: this policy was originated and endorsed by the National Wild Horse Forum meeting at the University of Nevada, Reno, Nov. 3, 1977. A copy of the resolutions and membership voting is attached to this report.)

(i) Advantages--It would insure a turnover of animals at the facility so roundups could continue as planned. It would also save monies spent on unadoptable animals, allowing the funds to be spent to improve facilities and care for other horses and to promote Adopt-A-Horse.

(ii) Disadvantages--Although several nationally recognized groups, including the American Humane Assn. and Wild Horse Organized Assistance endorsed the plan, other protectionist interests and some uninformed publics would likely voice strong opposition.

VI. RECOMMENDATIONS

The committee's recommendations as outlined below are all inter-dependent. Increasing manpower and roundup efforts are only practical if horses removed can be processed through the Palomino Valley facility in a timely manner and significantly increased adoption markets can be developed and sustained. Ideas for accomplishing these goals are included in the following recommendations.

A. Capture operations

1. Recommendation--Centralize the capture operations at the Palomino Valley facility. This would be accomplished by establishing a team of one foreman and four wranglers to handle all Nevada roundups. Each district manager requesting a roundup in his district would appoint one liaison to work with the team on-the-ground. Other district personnel may be requested by the team as needed for support. Authority for the capture operation would rest with the Palomino Valley facility manager through the team foreman. Equipment needs would be met by pooling from all districts as required. The team would perform only the physical and technical aspects of the roundup. The district liaison and/or district manager would handle all public/media contacts regarding the operation.

Rationale--Although the committee understands the district managers' desire to keep the capture operations on a district level, it was the committee's opinion that there would be numerous advantages to a centralized system that would outweigh the jurisdictional considerations. First, since the capture operation depends heavily on how fast animals are adopted or moved through the Palomino Valley facility, it's important that the two operations be bound together under one manager. Second, with the large numbers of animals that will need to be removed over the coming years, every budgeted dollar must be used as efficiently as possible. The committee felt a centralized operation would be more efficient in manpower and equipment costs than a district-run operation. Finally, as it becomes apparent that roundup operations will have to increase to keep pace with populations, the expertise of those doing the job becomes even more critical. The committee felt a small experienced team of wranglers who constantly work together and become familiar with each other's capabilities and methods of operation would be more efficient and be able to do the job safer and faster than district personnel who would have to learn the job and then only do it occasionally throughout the year.

2. Minority opinion (Sorensen)--Recommendation as above, except allow for active participation by district personnel at approximately a 50-50 level.

Rationale--District staff would have better familiarity with local terrain, access and horse distribution. They also would be better qualified to interface with permittees and special interest groups. This alternative is being practiced successfully by several other states.

B. Holding/Disposal Operation

1. Organization

a. Recommendation--As discussed in the report, the committee presented several alternatives regarding where in the Nevada BLM organization the Palomino Valley facility should be. The committee recommends that the facility be placed under the jurisdiction of the Nevada State Office, under direct supervision of the state director, not under any state office division or staff. If the first alternative is not acceptable, then the committee recommends that the facility be left under the jurisdiction of the Carson City District as an independent division under the direct supervision of the district manager.

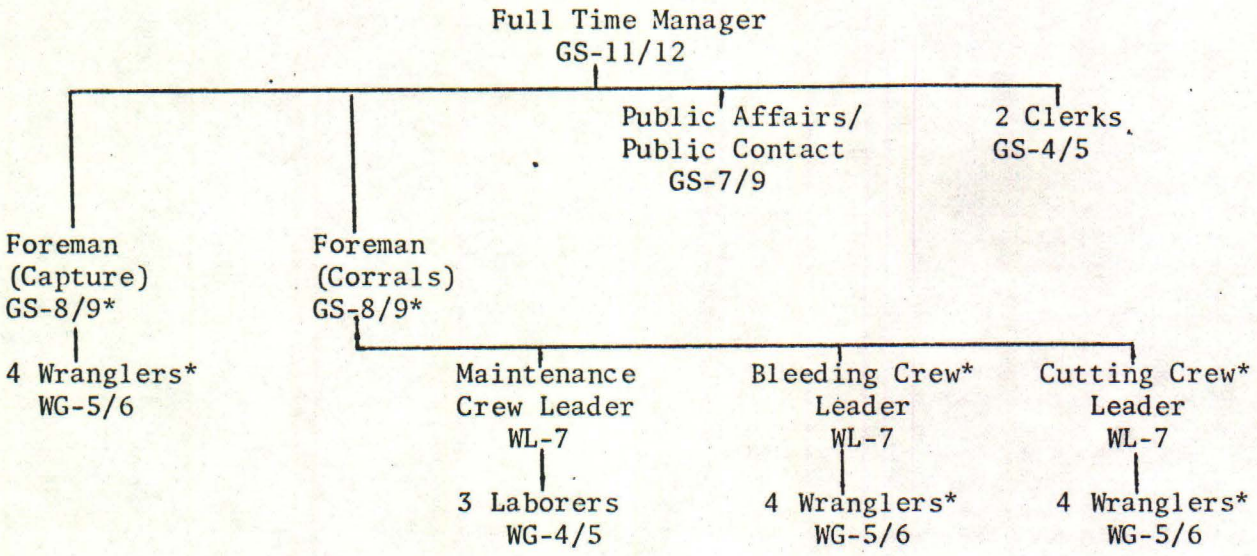
Rationale--Again, the committee recognizes that most of the district managers interviewed felt the operation should stay under district office jurisdiction. However, since the facility is a statewide operation and will handle horses from all six districts, the committee felt the facility belongs under state office jurisdiction for better coordination. Palomino Valley is the key to the entire Nevada wild horse operation and the responsibility for its success or failure should be a state, not a district responsibility. As for its placement in the state office organization, the same logic applies. Although there are organizational guidelines that would support placement in a state office division, the committee felt that the manager chosen would have such a high level of responsibility that he should be similar in status to a division chief. Only if the facility is given a high priority in the organization can we hope to solve our pressing problems. Although the committee realizes this would mean one more supervisory responsibility for the state director, it was felt the added responsibility would be well worth the advantages of high priority in the organization and increased control by the state director. If this recommendation is not acceptable, the committee felt assignment directly to a district manager would be preferable to assignment to a division.

b. Minority opinion (Sorensen)--Leave the holding and disposal operations under the Carson City District with assignment to either the chief of operations or as a separate division if workload/activity warrants. If the operation is assigned to the state office, place it under the Division of Technical Services.

Rationale--The centralized holdings and disposal assignment to a district office is working in two other states. The existing staff is accustomed to the present arrangement at Carson District. Various pieces of equipment and sharing of skill mix compléments the district operation. The assignment would benefit the Carson District organizational structure. If the decision were to make assignment to the Nevada State Office, Technical Services conforms to Manual 1213 and it would facilitate cooperation with enforcement. Assignment to the State Director is unnecessary if a Palomino manager is effective.

2. Staffing

a. Recommendation--Increase staffing at the Palomino Valley facility as shown below based upon a projected removal of 7,000 horses per year (adjustments might have to be made depending on funding and roundup restrictions).



*all interchangeable

This would require a total of 16 net staff increases above fiscal year 1978 levels. The man-months for the 16 additional staff would be partially offset by man-months currently allocated to the district capture operations.

As long as YACC is in existence and fully staffed, corpsmembers would be used to support the operation in the clerical, feeding and maintenance areas. Because the corps members are not long-term and are often assigned different jobs to expand the level of work experience, their assistance at Palomino Valley would not affect the staffing needs outlined above.

b. Rationale--As the report states, the committee found many problems at the Palomino Valley facility, nearly all caused by lack of trained manpower and facility inadequacy. The facility needs are outlined in the next section, but it should be emphasized that to use the expanded and improved facilities efficiently and to eliminate or reduce the number of complaints about the facility, staffing needs are critical. Based upon the current operation, the committee felt that staffing needs outlined are realistic and necessary to meet the Bureau's goals regarding wild horse control and maintain a facility that will hold up to public inspections and scrutiny. This staffing would be practical only if adoption markets are developed to absorb the 7,000 head/year level.

c. Minority opinion (Sorensen)--Consistent with the comment on the capture operations that they be left with the district offices, the recommended staffing level would be reduced by two or three positions in the capture group as shown in the chart. These man-months (not positions) would be used by the host district in the active participation in capture by on-board persons.

3. Facilities

a. Recommendation--Make the one-time improvements outlined below, contingent on increased staffing, removal of 7,000 animals per year, and increased funding covered in the next section. The operational occupancy of the corral would be 1,000 head.

One Time Improvement and Expansion of Palomino Facility

Visitor restroom facilities	6,000
Sprinkler System	4,000
Cutting chute	5,000
Tack room	5,000
Shelter (lean to)	2,000
Feeders	40,000
Roof over fly chute	1,000
Pipeline from well to corral	1,000
PA system	500
Office space 2000 sq. ft. at $35 (modular)	70,000
Landscaping	2,000
View Stand	5,000
Lightning protection	2,000
Perimeter pasture fences	20,000
Contract Administration/Design	16,000
Total	$179,500

b. Rationale--Many of the problems that have elicited complaints are tied directly to inadequate facilities. These one-time improvements will enlarge the facility, make it more flexible to handle unexpected conditions, provide better visitor accommodations, enable the staff to provide better care for the horses, and make the entire facility more aesthetically pleasing.

4. Funding

a. Recommendation--To cover the recommended staffing, one-time improvements, and expected recurring costs listed below the committee recommends raising the fiscal year 1979 component ceiling (43) for Nevada to $1,148,500 (this includes the $179,500 cost.)

Recurring Annual Costs

Hay	170,000	
Aircraft (helicopter rental)	100,000	
Trucking contract	50,000	
Veterinarian	40,000)	
Lab fee	22,000)	-- some recoverable
Brand inspection	6,000)	
Medicine	5,000	
Power	7,000	
Telephone	6,000	
Animal maintenance supplies	5,000	
Facility maintenance supplies	6,000	
Manure removal	8,000	
		425,000

Staffing of at Palomino Valley	
240 man-months x $1700 per man-month	408,000
One-time Improvement and Expansion	179,500
District and State Overhead	
Overhead 80 man-months x $1700 per month	136,000
Total	$1,148,500

b. Rationale--Although the committee recognizes this budget seems high, it felt that this level of staffing, improvements and recurring costs were necessary to meet the challenges ahead and bring the program up to publicly acceptable standards. Although this recommended budget ($1,148,500) would represent 58 percent of the total BLM wild horse budget distributed to the western states in fiscal year 1978, this is a reasonable share for Nevada considering that it has 60 percent of the wild hroses under Bureau responsibility.

C. Adoption

1. Recommendations

a. There appears to be a lack of coordinated Bureau-wide effort regarding adoption. Some BLM state offices seem more concerned with their own state operations and are not willing to assist other states in solving the Bureau's problems. The Nevada state director should write a strong memo requesting that the director stress full cooperation to all state directors, including establishment and full utilization of distribution centers.

b. Regarding current adoption centers and future centers, establish a standard reimbursable cost (transportation, handling, etc.) for all horses regardless of the location they came from, i.e. horses from Nevada should cost no more than horses from closer locations.

c. To prevent wasted computer-time and field effort, DSC should handle all screening before applications are placed on the computer. In addition, to prevent discouragement of applicants, DSC must enlarge its operations to process wild horse applications faster.

d. The current custodian cooperative agreement is unsatisfactory. The signalment key should be changed to identify standard recognized animal colors and facial markings. It is further recommended, to prevent such errors in the future, that all wild horse forms be routed to field offices for review prior to printing.

e. Washington Office should explore methods to conduct market research to find out who the potential custodians are, their estimated numbers, where to find them and what media approach would be best to reach them. However, a balance between promotion activities and capture funding must be achieved. In addition to market research, advertising promotion must also be accomplished. Washington Office should consider establishing in-house or contracting with an advertising promotion company to develop and implement long-term promotion ideas aimed at reaching that potential custodian public.

f. Since the administration has expressed support of legislation to allow transfer of title, the committee recommends that all Bureau offices be directed to do whatever they can to further support such legislation.

g. The Bureau should also seek legislative amendments to include authority for the BLM to sell or donate any excess horses that cannot be adopted. If this legislation is not forthcoming, the committee recommends that the Bureau establish a policy of humane destruction of excess animals that cannot be adopted within 90 days.

2. Rationale--As stated earlier, all field operations, including capture and holding facilities, are directly dependent upon the success of the Bureau in adopting animals. Adopt-A-Horse is a national Bureau program and as such should have the full support of all BLM managers. Nevada has, for all intents and purposes, placed as many horses among its own state residents as it can. It also lies far from population centers. Therefore distribution centers in other parts of the country are essential to Nevada's wild horse program. Establishment of these centers must be expedited.

Applications must be handled quickly so that horses are moved out of the Palomino facility and placed with custodians as quickly as possible to prevent overcrowded conditions. The large numbers of horses that must be removed in future years demands that a concerted nation-wide advertising program be established to promote Adopt-A-Horse and find thousands of willing custodians.

Finally, there is tremendous need for a legislative amendment to allow change of title. However, even if change of title is accomplished, there must be a policy established to dispose of animals after a specified period of time that are not adopted. Keeping horses at the Palomino Valley facility indefinitely is costing large amounts of money and has already succeeded twice in causing the shutdown of vitally needed roundup operations to alleviate overgrazing.

D. General Policy

1. Recommendations

a. The Washington Office should establish Bureau-wide policies regarding all aspects of the wild horse and burro program to improve agency credibility. Right now, each state is setting its own policy and differences are becoming apparent to public groups, giving the Bureau an uncoordinated, disorganized appearance. An example is when to round up animals. Some states refuse to round up horses during the foaling season (March through May, generally) because of the chance of mares under stress losing foals and new born colts being lost. While this policy is publicly acknowledged in one state, a neighboring BLM state is conducting roundups during the same period. Another example is one state absorbing brand inspections and health costs to lower the pass-along costs to custodians and others are passing these costs along to the custodians. These inconsistencies should be eliminated.

b. Very old (10 years and older) animals captured in BLM roundups should be turned back onto the range in areas where wild horse management is planned; in areas where management of wild horses is impossible, such as areas of scattered land ownership, very old animals that are captured should be humanely destroyed.

c. Nevada BLM should experiment with gelding some studs seven to 10 years old to see if this will increase the adoption rate of these older animals. Costs for gelding should be passed along to the custodians.

2. Rationale--The wild horse program is probably the Bureau's most visible national effort. Policies should be established at the national level and adhered to by the states. To maintain credibility, policy should not be different in every state. Very old animals are not appealing to most custodians. Custodians generally want young animals that are healthy, easier to train, and better able to adopt. Therefore, these older animals, for their own sake as well as that of the custodians, should not be offered for adoption.

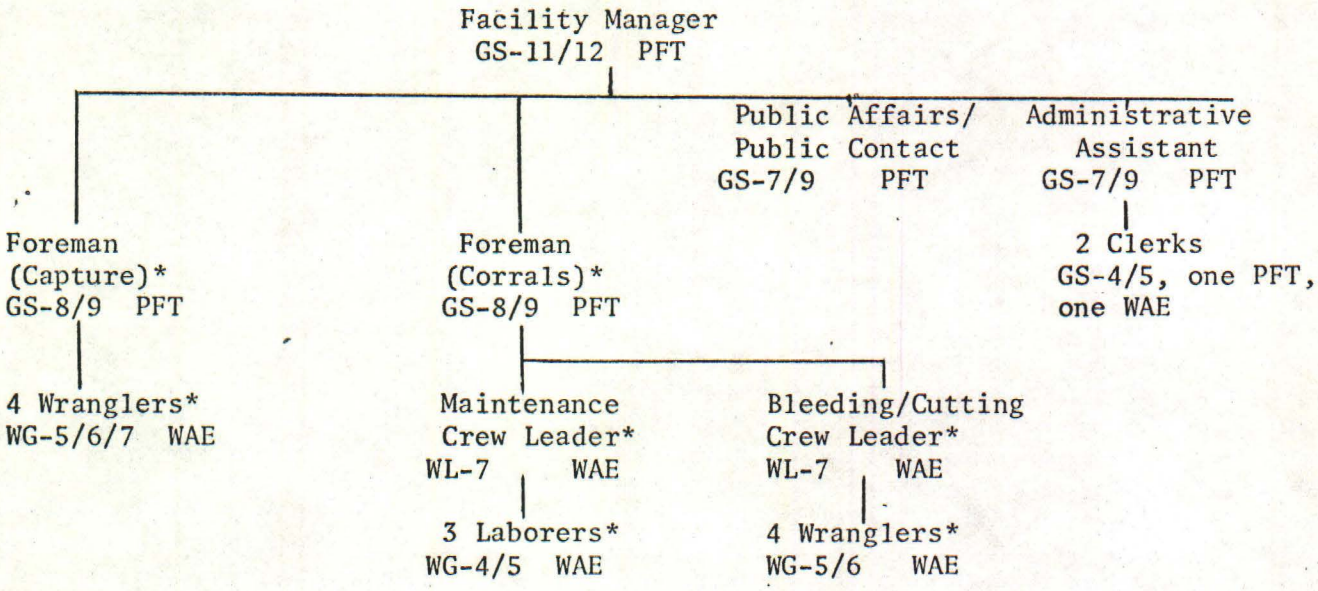
VII. STATE DIRECTOR'S RECOMMENDED DECISIONS

A. Capture Operations--Centralize the capture operations at the Palomino Valley facility. This would be accomplished by establishing a team of one foreman and four wranglers to handle all Nevada roundups. Each district manager requesting a roundup in his district would appoint one liaison to work with the team on-the-ground. Other district personnel may be requested by the team as needed for support. Authority for the capture operation would rest with the Palomino Valley facility manager through the team foreman. Equipment needs would be met by pooling from all districts as required. The team would perform only the physical and technical aspects of the roundup. The district liaison and/or district manager would handle all public/media contacts regarding the operation.

B. Holding/Disposal Operation

1. Organization--Leave the Palomino Valley facility under the jurisdiction of the Carson City District Office, but do not put it under an existing division or area. The facility manager would essentially be on the same level as an area manager and would report directly to the district manager.

2. Staffing--Increase the staffing as outlined below for fiscal year 1979:



*all personnel interchangeable

3. Facilities--Make the one-time improvements outlined on the next page contingent on increased staffing, removal of 7,000 animals per year, and increased funding covered in the next section. The operational capacity of the corral would be 1,000 head.

One Time Improvement and Expansion of Palomino Facility

Visitor restroom facility	6,000
Sprinkler System	4,000
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Pipeline from well to corral	1,000
PA system	500
Office space 2000 Sq. Ft. at $35 (modular)	70,000
Landscaping	2,000
View Stand	5,000
Lightning protection	2,000
Perimeter pasture fences	20,000
Contract Administration/Design	16,000
Total	$179,500

4. Funding--To cover staffing, one-time improvements, and expected recurring costs listed below, the recommended decision is to raise the fiscal year 1979 component ceiling (43) for Nevada to $1,080,500.

Recurring Annual Costs

Hay	170,000	
Aircraft (helicopter rental)	100,000	
Trucking contract	50,000	
Veterinarian	40,000)	
Lab fee	22,000)--	some recoverable
Brand inspection	6,000)	
Medicine	5,000	
Power	7,000	
Telephone	6,000	
Animal maintenance supplies	5,000	
Facility maintenance supplies	6,000	
Manure removal	8,000	
Total		425,000

Staffing at Palomino Valley

200 man-months X $1700 per man-month	340,000

One-time Improvement and Expansion	179,500

District and State Overhead

Overhead 80 man-months X $1700 per man-month	136,000
Total	$1,080,500

C. Adoption

1. There appears to be a lack of coordinated Bureau-wide effort regarding adoption. Some BLM state offices seem more concerned with their own state operations and are not willing to assist other states in solving the Bureau's problems. The Nevada state director should write a strong memo requesting that the director stress full cooperation to all state directors, including establishment and full utilization of distribution centers.

2. Regarding current adoption centers and future centers, establish a standard reimbursable cost (transportation, handling, etc.) for all horses regardless of the location they came from, i.e. horses from Nevada should cost no more than horses from closer locations.

3. To prevent wasted computer-time and field effort, DSC should handle all screening before applications are placed on the computer. In addition, to prevent discouragement of applicants, DSC must enlarge its operations to process wild horse applications faster.

4. The current custodian cooperative agreement is unsatisfactory. The signalment key should be changed to identify standard recognized animal colors and facial markings. It is further recommended, to prevent such errors in the future, that all wild horse forms be routed to field offices for review prior to printing.

5. Washington Office should explore methods to conduct market research to find out who the potential custodians are, their estimated numbers, where to find them and what media approach would be best to reach them. However, a balance between promotion activities and capture funding must be achieved. In addition to market research, advertising promotion must also be accomplished. Washington Office should consider establishing in-house or contracting with an advertising promotion company to develop and implement long-term promotion ideas aimed at reaching that potential custodian public.

6. Since the administration has expressed support of legislation to allow transfer of title, the committee recommends that all Bureau offices be directed to do whatever they can to further support such legislation.

7. The Bureau should also seek legislative amendments to include authority for the BLM to sell or donate any excess horses that cannot be adopted. If this legislation is not forthcoming, the committee recommends that the Bureau establish a policy of humane destruction of excess animals that cannot be adopted within 90 days.

D. General Policy

1. The Washington Office should establish Bureau-wide policies regarding all aspects of the wild horse and burro program to improve agency credibility. Right now, each state is setting its own policy and differences

are becoming apparent to public groups, giving the Bureau an uncoordinated, disorganized appearance.. An example is when to round up animals. Some states refuse to round up horses during the foaling season (March through May, generally) because of the chance of mares under stress losing foals and new born colts being lost. While this policy is publicly acknowledged in one state, a neighboring BLM state is conducting roundups during the same period. Another example is one state absorbing brand inspections and health costs to lower the pass-along costs to custodians and others are passing these costs along to the custodians. These inconsistencies should be eliminated.

2. Very old (10 years and older) animals captured in BLM round-ups should be turned back onto the range in areas where wild horse management is planned; in areas where management of wild horses is impossible, such as areas of scattered land ownership, very old animals that are captured should be humanely destroyed.

3. Nevada BLM should experiment with gelding some studs seven to 10 years old to see if this will increase the adoption rate of these older animals. Costs for gelding should be passed along to the custodians.