

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds



Full Episode Transcript

With Your Host

Carol Walker

[Freedom for Wild Horses](#) with Carol Walker

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

If you've wondered when the roundups to zero out Wyoming's Checkerboard wild horses will occur and what you can do to help, then this episode is for you. I'm your host, Carol Walker, and let's get started.

Welcome to the *Freedom For Wild Horses* podcast, the place to find out about wild horses in the American West and what you can do to help them stay wild and free. If you love wildlife, wild horses, and the freedom that they stand for, this show is for you. I'm your host, Carol Walker. Let's get started.

People often ask me, "Why is it important to submit comments for actions that the Bureau of Land Management is proposing for our wild horses, when it seems as though they never listen to comments from the public?" It's important because, without comments from the public, the BLM can say that no one is opposed to their actions. And yes, in fact, they do make changes sometimes to environmental assessments based on responses from the public.

And if there is any hope of making changes to the way BLM manages our wild horses on our public lands, I'm going to be there pushing for it, demanding it every step of the way. I hope that you will be there too.

There were two public comment periods opened for [the Checkerboard Herds](#), which are Adobe Town, Salt Wells Creek, Great Divide Basin, and White Mountain. Since BLM already conducted a devastating roundup in White Mountain last August, it is not one of the herds they plan to round up starting July 15th, 2025. They plan to remove 3,624 wild horses from [Adobe Town](#) and Salt Wells Creek.

The resource management plan amendment in Rock Springs and Rollins, which was finalized on May 9th, 2023, changed the way that these herds will be managed. All of Salt Wells Creek Herd Management Area has been changed to a herd area managed for zero wild horses. All of Great Divide Basin Herd Management Area has been changed to a herd area managed

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

for zero wild horses. The Rock Springs portion of the Adobe Town Herd Management Area has been changed to a herd area managed for zero wild horses. But the Rollins managed portion of Adobe Town will remain a herd management area, but with a greatly reduced appropriate management level of 259 to 536 wild horses instead of 610 to 800 wild horses.

The last roundup in these Checkerboard herds was conducted in 2021 to 2022. White Mountain Herd Management Area was initially designated to be left alone and not zeroed out under the RMP, and to not be managed as a non-reproducing herd, but left with an appropriate management level of 205 to 300. However, since then, the Rock Springs Grazing Association has announced that they have withdrawn their consent for wild horses to be allowed in the Checkerboard. And we initially heard that there would be an amendment made to the RMP this year to change the status of this herd to a herd area managed for zero wild horses.

This has not happened yet, but we just found out from the BLM's own count after the roundup in August, there were only 79 wild horses left, which is below the low appropriate management level and below the number needed to maintain this herd, and a clear path to extinguish this herd. Our team, led by American Wild Horse Conservation, including Animal Welfare Institute, Western Watersheds Project, Kimberly Curl, Chad Hansen, and me, Carol Walker, represented by Eubanks and Associates, sued in May 2023 to prevent this zeroing out of the herds.

We lost in district court, but appealed to the 10th Circuit court. In March of this year, I attended the oral argument in Denver, where Bill Eubanks, representing us, as well as attorneys representing two other groups, presented arguments in front of a panel of three judges. These judges have not yet ruled, so we do not yet know what the final outcome will be. Even though this decision has not yet been made, BLM released the plans for roundups starting July 15th, 2025.

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

The judges are aware of this, but it could take several months before they issue a decision. The BLM is clearly confident that the court will rule in their favor, or they are jumping the gun to appease the Rock Springs Grazing Association, or both.

The first of two documents that the BLM has released with a roundup plan is a DNA, which is a determination of NEPA adequacy for Adobe Town, which states that the BLM can take this action without further analysis because they already have their 10-year plan released in 2021 to bring the herd to low appropriate management level of 259 and use PZP for contraception on 129 mares that are to be released. They estimate that there are 2,438 wild horses in Adobe Town, and they plan to remove 2,179.

I completely disagree with this. Please comment for the BLM to take no action. First of all, a 10-year plan should not be in place. Every time an action is taken, there should be an opportunity for public comments. There should be a full NEPA analysis done of the area and impacts, and new population counts done. The low AML, appropriate management level number, is not the number before the RMP amendment was put into place. It is the new number, and if we win our lawsuit, the low AML number should revert to 610 wild horses.

If they are going to use the 2021 documents, then they cannot just randomly change things without doing a new environmental assessment. No plan should be finalized until after the 10th Circuit Court has ruled. Wild horses are still foaling throughout the summer and fall in this area. Conducting a helicopter roundup in mid-July will risk harming heavily pregnant mares and newborn foals.

The winter of 2022 to 2023 was the harshest and most devastating to all wildlife in this area since 1973. Adobe Town was the epicenter of the worst deaths, and probably half of the wild horses in this area died right after the roundup in 2021 had already brought the horses down to low appropriate

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

management level. There is no possible way that there are that many horses left in this herd management area.

I have grave concerns about how many horses will be removed, especially after the White Mountain debacle, where they only left 79 wild horses at the end of the roundup, when the minimum they were supposed to leave was 205 wild horses. Despite my requests and concerns, I was actually there at the roundup, they did not do a count of the horses left immediately after the roundup, when it would have been easy to return horses to leave the herd at 205. The count immediately afterwards is common practice for the BLM. If this herd is rounded up, it is imperative that a count is done immediately to ensure that the herd is not taken below the low AML prior to the resource management plan amendment of 610 wild horses.

Last, what will happen to the horses once they are removed? BLM never considers this in their proposals. Given that the holding facilities are full to bursting with over 68,000 wild horses, and given that Project 2025 calls for killing the wild horses in holding facilities, this zero-out roundup plan will likely mean a death sentence for these 2,179 wild horses that would be removed. They should not be removed.

You can make your comments online and view the documents on my website. You can click on the green Participate Now button to submit comments in your own words. As always, I recommend that you do this rather than sign onto a form, which the BLM will count as one comment, no matter how many hundreds of people sign onto this form. The deadline for this comment period in Adobe Town is April 28th, 2025 at 4 p.m. Mountain Time. Please feel free to use any of my suggestions and comments to make your own comments.

The next comment period I'm going to discuss today is for the zeroing-out of Salt Wells Creek, Great Divide Basin, and the Rock Springs managed portion of Adobe Town. The purpose of this proposal is, quote, "To remove excess wild horses from herd areas that have been determined to be

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

unsuitable for the long-term management of wild horses due to the presence of interconnected private lands and to remove wild horses from private lands within these herd areas as requested by the private landowner."

This plan includes removing all of the horses from these areas, which are now estimated to be about 2,755 wild horses. And this is a plan to zero out the herds entirely, leaving no wild horses. This zero-out plan is a direct result of the resource management plan amendment finalized in May 2023. If the 10th Circuit Court rules in our favor and overturns the RMP, then the BLM cannot proceed with the zero-out plan. They can, however, conduct a roundup down to the previous low AML numbers of 251 for Salt Wells Creek, 415 for Great Divide Basin, and 610 for Adobe Town. But this would require a new environmental assessment.

The BLM states that a survey of these areas for population count was conducted in fall 2024 to winter 2025. And the numbers in each area are said to be: Adobe Town, which is the Rock Springs portion, 736; Salt Wells Creek, 1,125; and Great Divide Basin, 894. Because of the RMP amendment, all wild horses in these areas are determined to be excess and need to be removed.

The main point that needs to be made here is that no plan should be finalized and no roundup activity should be conducted until the judges make their decision. BLM may say it's going to take several years to completely zero out the herds, but you can be pretty sure that they will do everything they can to take every single horse this year. And what will be left will be a completely gutted herd with a handful of horses scattered to the winds. No action alternative. This is the alternative I suggest that you request, that the BLM will not conduct a roundup.

There has been no determination that due to the presence of the horses that a thriving natural ecological balance does not exist. It is simply that the RMP has been revised. Zeroing out these herds is a violation of the 1971

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

Wild Free-Roaming Horses and Burros Act. Adobe Town has only about 10,000 acres out of almost 500,000 acres that is in the Checkerboard. Yet they plan to zero out more than one quarter of the area, 118,164 acres, because the horses would, quote, "constantly stray onto private land." No, this is not how the act works. Section four says if a private landowner requests horses be removed from private land, they should be removed. Not that you can remove them from public land in anticipation of their straying.

The BLM considers foaling season to be between March 1st and June 30th and prohibits helicopter roundups during this time. But foaling season continues all summer and into the fall, and it is not safe or humane for small foals and heavily pregnant mares to be chased by helicopters. Salt Wells Creek is home to the largest number of rare wild curlies. Zeroing out this herd will remove this rare wild horse population. And since the only other herd in Wyoming with wild curlies has been taken down to 79 horses, this is the last herd that contains these rare genetics. These horses should not be zeroed out.

Last, what will happen to the horses once they are removed? BLM never considers this in their proposals. Given that the holding facilities are full to bursting with over 68,000 wild horses and given that Project 2025 calls for killing the wild horses in holding facilities, this zero-out roundup plan will likely mean a death sentence for these 2,755 wild horses that would be removed. The comment period for the zero-out plan ends April 30th, 2025 at 4 p.m. Mountain Time.

You can read the documents and comment online if you go to my www.wildhoofbeats.com website, and you can comment using the green Participate Now on the link. As always, I request that you use your own words instead of signing onto a form, which the BLM counts as one comment, even though hundreds of people have signed onto it. You are welcome to use my suggestions to make your own comments.

Ep #51: Comment Against the Zeroing Out of Wyoming's Checkerboard Herds

Thank you for listening to this episode of *Freedom for Wild Horses*. If you'd like to get the links to comment and see the map, you can go to my website www.wildhoofbeats.com, and go to the podcast section.

Thank you for listening to this episode of *Freedom for Wild Horses*. If you want to learn more, follow me at www.wildhoofbeats.com for more information and for ways to help America's wild horses. See you next time.