

## Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments



### Full Episode Transcript

With Your Host

**Carol J. Walker**

## **Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments**

If you've wondered how you can help some of Wyoming's most amazing horse herds, 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.

On March 25th, 2026, BLM issued a press release for a scoping document for the Red Desert Complex in Wyoming, with public comments due May 4th, 2026. In commenting on a scoping document, the public has the opportunity to tell BLM what to analyze, which is why this is so important.

The BLM proposed a herd management area plan for the Red Desert Complex in Wyoming for five wild horse herd management areas in Wyoming, consisting of 753,000 acres, which they have divided up into two parts. They actually cannot do this division without a change to the land use and resource management plan. But this is what the scoping document says for five wild horse herd management areas in Wyoming.

The North Red Desert Complex consists of Antelope Hills, Crooks Mountain, and Green Mountain herd management areas with about 333,694 acres. It is managed by the Lander BLM field office. The South Red Desert Complex consists of Stewart and Lost Creek herd management areas with about 419,000 acres. It is managed by the Rawlins BLM field office. The BLM has never before changed a Red Desert Complex into two BLM complexes

No mention is made of Arapaho Creek herd, which lies in the middle of these five herd management areas, because it is not managed any longer for horses. It is dismissed as the "donut hole," and wild horses who enter its confines are classified as off-range. More about that as I continue.

## **Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments**

The appropriate management level, AML, for the whole complex, north and south together, is 480 to 724 wild horses. This number was set over 30 years ago and has not been revised since. AMLs are not supposed to be set in stone, but they should change as conditions change on the ground.

Many of these herd management areas have AMLs set together at 80 horses, far below the number needed to ensure genetic viability. And the reason given for this is that the horses move between HMAs, and there is cross-breeding. And this even comes up in the section of documents devoted to genetic viability, which was found to be good, and, quote, “a single interbreeding herd” with some, quote, “limited population subdivisions beneficial to the maintenance of long-term genetic diversity,” unquote.

And where do most of these wild horses cross into other HMAs? Through the Arapaho Creek herd area. The horses from the different HMAs meet and mingle and breed there. I have been observing and photographing the wild horses of the Red Desert Complex since 2016, several times per year. I have witnessed bands moving from one HMA to another through the herd area.

There are distinctions in color between the HMAs. Stewart Creek has many Appaloosas, mostly varnish roans. Crooks Mountain has many bays and some pintos. Green Mountain has many blacks and pintos. Antelope Hills has the most Spanish of the herds, including some amazing buckskins and duns with primitive markings. Lost Creek has quite a bit of Spanish in it as well, with many pintos. The Arapaho Creek is a mixing bowl of all the HMAs.

The last roundup on the Red Desert Complex was in the fall of 2020, when 1,970 wild horses were captured with helicopters. Ten died, and 197 were returned. The population estimates are wildly skewed and don't take into account the devastating winter of 2022 to 2023. Just adding 20% every year to the numbers is not an accurate way to assess the population of the

## **Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments**

complex. Also, movement of the horses between the HMAs is not accounted for.

There has been tremendous movement of horses since the catastrophic winter of 2022 to 2023, and then the drought of last year. Horses are moving in ways I have not seen before, and these changing conditions with the record low snowpack of this year, lowest since 1981, means the BLM should be taking current and future conditions into account when making a herd management area plan.

Sweetwater County, South Red Desert, was designated a USDA natural disaster area due to drought conditions in 2025. The BLM should also be taking into consideration present and future mining operations, which take a tremendous amount of water. Additionally, in summer, a cow-calf pair, which the BLM calls one AUM, uses 40 gallons of water a day. A wild horse uses 15 gallons per day. Which population is more suited to resisting a drought? It is completely inadequate in summer for the BLM to say, quote, "it is important to note that these HMAs are not exclusively used by wild horses. In accordance with BLM's multiple user mandate, there are many other legal users of this land within these HMA boundaries. This can make attributing impacts on the land to a specific land use or user difficult.

When talking about impacts to forage, water, and space, blame is often attributed to the "other" users. As this relates to wild horses, it is clear that wild horses are contributing to impacts on the landscape, but they are not the only contributors. By the same token, other users also contribute to these impacts and cause their own unique impacts, which may directly or indirectly affect wild horses.

The purpose of this management evaluation is not to parse out impacts by resource use, but the goal of this evaluation is to compare current use with past use and to identify any future changes related to wild horses that may need to be made." This is on page 18.

## **Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments**

This is extraordinary and not in a good way. In fact, exactly what the BLM should be doing, is working out how each user of the land is impacted. Otherwise, they are just throwing up their hands and scapegoating wild horses for damage to riparian areas and for drinking all the water without making any determination about the impacts of cattle and sheep, especially since some sheep can be out on the range all year long.

Quote, "Large populations of wild horses often strain the key water supplies in riparian zones. Many run dry during summer," unquote. There will be drought this summer, and BLM must not be allowed to blame wild horses for any and all impacts. They must analyze the impacts for all users. They must analyze and propose range improvements that help deal with the increasing drought so that the wild horses can have their use.

The BLM should map out all water resources and list those with fences that block access to water; fix broken springs, wells, and pipelines. Wells that are turned off by ranchers when no cattle are in the area should be evaluated.

Interestingly, Arapaho Creek herd area, where there have been wild horses for decades, is the most water-rich area of all, and it was changed from a herd management area to a herd area. It should be changed back to a herd management area, recognizing that it is central to all the herd management areas and an integral part of the complex.

Regarding birth control, quote, "aggressive," unquote measures are not needed. Just because the BLM administers PCP during a roundup, and it does not follow up with more treatments until the next roundup six or 10 years later, does not mean birth control has failed. Rather, it is a failure of the BLM to administer it properly. There is no need for unscientific and unproven sex ratio skewing. The sex ratio in the complex was already wildly skewed stallions to mares by the extreme winter of 2022 to 2023, due to pregnant and nursing mares being more vulnerable. Do not skew the sex ratio even further, which will result in greater instability for the herds.

## **Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments**

There is no need to use GonaCon, an known sterilant. No need to geld stallions. The darting mares is possible. Traps can be set up at water sources. Documentation of the herds must be done. All this takes time and manpower, but it is possible. Birth control darting has been done in Stewart Creek. Planning needs to be done in order to implement birth control across the complex.

I visited Antelope Hills, Green Mountain, Lost Creek, Stewart Creek, and Arapaho Creek in February of this year. All the horses that I saw were in good to excellent condition, coming out of a very mild winter.

Here are some talking points to use in crafting your own comments, which are most valuable when in your own words. Signing on to a form letter will not be useful for your comment. They will not be considered.

This is a list to start from. It is by no means exhaustive, and it will be most helpful if you use your own words.

One: Study and present the impact of all users of the complex. Use data, tables, and maps.

Two: Study, map, and present the movement of the horses throughout the complex, between HMAs, and including barriers and fences. If BLM must use north and south to divide the complex, they must show how the horses cannot move between them or can move between them. If there are plans to keep this designation, it must be included in a resource management plan.

Three: Study and display information on the historic and essential area, Arapaho Creek herd area, and restore this herd area to herd management area status. It is an essential part of maintaining genetic viability of wild horses, as well as providing important water and forage to maintain healthy wild horses.

Four: Redesignate foaling season as March 1st to October 1st. July is the height of foaling season in the complex, not the end.

## Ep #67: Planning for the Red Desert Complex Wild Horses Needs Your Comments

Five: Repair and support water sources. Inventory all springs, troughs, ponds, lakes, tanks, wells, and document their condition and what users can access each one, and for how many months. Repairing water access will be a vital tool to spread out wild horse use of the complex, not the end.

Six: Detail where the current resource management plans for Lander and Rawlins are inadequate and no longer match current conditions. Include the impact of human use, mining, drought, wildlife, sheep, and cattle.

Seven: Make amendments to the resource management plans that will match the reality on the ground and include a section for wild horse management, rather than removal.

Eight: Plan to use humane, reversible birth control like PZP instead of sterilization. Document wild horses on the range. Saying it is too hard to implement fertility control on the range and then using helicopters to round up and remove the horses every few years is unacceptable.

Do not skew the sex ratio of the stallions to mares. There is no scientific data showing this works to control population growth, and it just results in greater instability for the herds.

If you go to my latest blog post on [www.wildhoofbeats.com](http://www.wildhoofbeats.com), you can get the link to the BLM project with the documents and the place to submit your comments by May 4th. Thank you for listening to this episode of Freedom for Wild Horses.

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