

December 19, 2007

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Dear Jared:

I wish to make a few comments on the **PRYOR MOUNTAIN WILD HORSE RANGE DRAFT EVALUATION**, issued November 19, 2007. Firstly, I commend those who put this comprehensive document together, through a great deal of research, organization, and writing. While I may disagree with some of its underlying principles, proposals, and tentative planning actions, this was hard work well done.

- The first thing I noticed was that the deadline for comments was a bit unclear, as was the individual to whom to submit remarks. That should be spelled out more clearly within the letter to Interested Parties. I am assuming that a 30-day comment period would, technically, end today. These are minor details but important. Also, the Billings BLM has, in the past, sent out mass e-mails to Interested Parties, making it easy for individuals and groups to share this document online and to print it out, when needed.
- I am assuming that the 1984 AML (stocking rate) of 121 adult horses listed on page 2 (amended to 95 in July 1992) excludes all horses less than one year of age. AML is defined within this document as such, "*Appropriate Management Level* means the maximum amount of adult (one year or older) wild horses or burros that can be maintained within an area without causing resource damage." I have seen AML defined as excluding horses less than six months old. Am I reading inconsistency within agency definitions for AML? On page 2, you write that "*Actual numbers may vary from year to year due to variations in foal crops, natural death loss, forage productivity and other factors including budgetary constraints.*" An update might read that population may also be impacted by the aggressive use (or lack of application) of porcine zona pellucida (PZP).
- The extremely long, but comprehensive, range study accomplished by the Natural Resources Conservation Service might be shortened, for short-term range monitoring, by the use of random sampling of selected plant community (range ecosystem) types within the Pryor Mountain Wild Horse Range. Dr. Will Blackburn, Area Director, Northern Plains Area USDA-ARS, Ft. Collins, Colorado, might be of help in setting up range studies using randomization methodologies: <http://www.ars.usda.gov/pandp/people/people.htm?personid=480>. Just a thought.

- The Billings BLM seems to have inconsistent genetic management of the PMWHR herd. Policy has flip-flopped (within the same management plan) from preserving old Colonial Spanish characteristics to simply maintaining genetic variation, regardless of color, confirmation, or breed type. Linda Coates-Markle had established a system of preserving equal genetic representation through contraception or gathering horses well represented, genetically, within the range area. However, the 1984 plan conveys, *“The emphasis in herd management will be to limit the reproduction rate and perpetuate the characteristics of the Pryor Mountain Wild Horses. This will necessitate beginning a selection program to retain only those wild horses with confirmation, color and breeding (genetic) characteristics typical of the Pryor Mountain wild horses.”*

Preserving Colonial Spanish herds is, of course, of significant value historically, to some groups and individuals, even if one believes that these alleles are rare and becoming more rare through natural genetic drift. However, perhaps the BLM might consider establishing separate herds called “American Heritage Herds” that are, essentially, selective breeding farms. Other herds, called “Natural Wild Horse Ranges” would emphasize “in-the-wild” management, with little human imposition, except for population control, and water source enhancements, in livestock-free areas on federal lands.

- Frankly, I have long been disturbed by the potential admixture of intact herds. This destroys the genetic integrity of a wild herd. Each herd should, in my view, be left as an entity unto itself. Again, we are “farming” these “wild” horses. Here is what was written: *“When it becomes necessary to reduce the number of horses within a herd area, the excess horses will, if possible, be relocated to one of the other herd areas. If this option is not available, the excess horses will be disposed of through the adoption program or other legal processes.”* (pp. 2, 3) I would rather see the Pryor horses adopted out than to become part of another HMA. The 1984 plan was ill-advised, in this respect, and the introduction of (five) Kiger studs into the Pryors (circa early 1990’s), at the encouragement of Reverend Floyd Schwieger, proved to be a disaster, with most Kiger stallions removed, after a public outcry.

#### **“Age Structure**

- *Objective: Maintain a herd with the age structure weighed to young horses.”* (page 11)  
I see no value in this. A hypothesis exists that younger horses are mentored by older horses within the herd, although no empirical data exists to prove this, but it simply makes behavioral sense. Also, the removal of older horses seems inhumane, as the lives of animals that have been living in the wild for a long period of time are far more disrupted than younger animals that may adjust more quickly to changing environments and domestication.

#### **“Supplemental Feeding**

- *Objective: Supplemental feeding of the Pryor Mountain wild horse herd is a management tool which can be utilized in emergency situations in order to maintain a viable breeding population. (Rest of the objective was Revised see 1992 HMAP Revision Objectives)”* (page 12). I agree with carefully planned supplemental feeding, taking care to use diets that will not cause colic, under the direction of an

experienced equine veterinarian.

#### **“RECREATION**

- *Should recreation use of the PMWHR increase to the point that facilities such as Penn’s cabin are being destroyed, upland bird or big game species of wildlife are being over harvested, or the wild horses are being unnecessarily harassed on BLM land, a revision to limit recreational use of the area may be needed.”* (page 15). No... Recreation should take a back seat to the well-being of the wild horse herd and other species (animal and plant) within the wild horse area. Perhaps a reservation system, similar to that used in national park backcountry campgrounds, could be established to keep human population numbers to a level that will not socialize the herd in well-visited areas of the range or destroy natural habitats. The new Pryor Mountain Wild Mustang Center’s interpretive center is a most welcomed addition for interpreting the Pryor Mountain horses before the visitor reaches the range, as are the extremely valuable interpretive signs existent within the range area. The message should be conveyed that visitors are entering a fragile environment.

#### **“WILDERNESS DESIGNATION**

- *If congress accepts BLM’s recommendation to designate portions of the PMWHR as Wilderness, a revision as to the number and types of improvements proposed may be needed as well as a revision to methods utilized to roundup and move wild horses.”* (pp. 15, 16). Wild horses have been shown by empirical mt-DNA and paleontological data to be native to North America, and, as such, should be treated as other wildlife in wilderness areas, not as exotics.

#### **“Sorenson Extension**

- *Objective: Improve range conditions on the officially authorized portion of the Dryhead Herd Area by providing limited, temporary use of the Sorenson Extension as a winter range.”* (page 32). The Sorenson Extension should be permanently established as part of the Pryor Mountain Wild Horse Range, i.e., within permanent boundaries.

#### **“APPENDIX III**

- **ADJUSTMENTS TO APPROPRIATE MANAGEMENT LEVEL” (pp. 46, 47)**  
While I understand the need to keep the population of the Pryor Mountain wild horses at an appropriate level, to allow for a healthy ecosystem, healthy herd, and sustained multiple-use by other wildlife, as well as respect for rare and endangered members of the plant community, I would recommend that a BUFFER POPULATION of wild horses be maintained within this range, due to the potential for catastrophic population loss. This is a special herd, both historically and genetically, and should be thoughtfully managed to prevent loss of the entire herd, due to its low population base.

Respectfully,

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