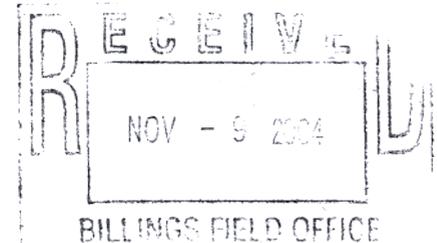




File Code: 1530/2260

Date: November 5, 2004

Sandra Brooks
Bureau of Land Management
5001 Southgate Dr.
Billings, MT 59101



Dear Sandy:

Thank you for hosting our recent interagency meeting regarding Pryor Mountain Wild Horse Herd Plan revision issues. As do you, the Forest Service would like to see the herd plan revision address management that can regain a thriving ecological balance, maintain a sustainable herd, and manage the herd as free roaming.

The PMWHR issues are complex. You requested that the Forest Service consider territory expansion into the Pryor Spur area as an alternative considered under full NEPA analysis. The Forest Service believes that consideration of this alternative in NEPA is premature. At this time, the Forest Service is not in favor of forgoing other established uses of National Forest resources as specified in our Forest Plan.

Current established uses are as follows.

- The current wild horse territory designation was made through several decision points since the passage of the 1971 Wild Horse and Burro Act. In the mean time, other management decisions were made on adjacent lands and incorporated in current Forest Plan direction. The Forest Plan decisions are not compatible with a minimally managed wild horse herd.

The area suggested for possible expansion is currently recommended for wilderness through the Forest Plan. The Forest Plan goal for recommended wilderness (Management Area H) is to be managed for wilderness values. Wild horses could alter the current natural ecological resources contributing to the area's wilderness recommendation. An action that encourages establishment by feral animals is not compatible with Forest Plan direction for managing wilderness values.

- Lost Water Canyon Research Natural Area (RNA) is within the recommended wilderness. The Forest Plan goal for this RNA (Management Area L and H) is to be managed as a baseline area for monitoring long-term ecological changes, especially in those communities dominated by Douglas-fir, found near its eastern limit, and in subalpine grasslands. The RNA serves as a nearly intact watershed for study of limestone bedrock hydrology. The RNA also provides a protected site for long-term monitoring of a large population of the regionally endemic and sensitive plant species,



Shoshonea pulvinata, known only from the Pryor and Beartooth Mountains of Montana and portions of northwestern Wyoming. Unfavorable ecological changes could occur due to the inability to actively manage horse use intensity, timing, and duration (pursuant to the 1971 Act). Therefore, wild horse establishment and minimal management are not compatible with the goals of this RNA designation. The Regional Forester has not delegated me the authority to change research natural area boundaries.

- The Forest Plan goal for the Dryhead Overlook Area (Management Area D) is to maintain or improve the long-term diversity and quality of habitat and to accommodate other resource management activities. Unfavorable ecological changes could occur due to the inability to actively manage horse use intensity, timing, and duration (pursuant to the 1971 Act). Expanding the territory could easily expand rangeland condition problems in a subalpine setting that is slow to recover, as evidenced by low to moderate rangeland conditions, after 40 years of rest from livestock use. Wild horse establishment and minimal management are not compatible with goals for this area, nor would it allow for a “thriving ecological balance” per the 1971 Wild Horse and Burro Act. The 2004 NRCS PMWHR Rangeland Inventory and Assessment management recommendations reaffirm this concern relative to rangeland expansion without more active management.
- The Dryhead Overlook area is also currently being considered for a nomination as a traditional cultural property district due to its richness in archeological resources along with its past and present traditional use by tribes. If wild horse establishment were allowed, increased visitation for wild horse viewing would be expected. There is potential for conflict with traditional tribal use of the area with increased visitation.
- New horse confinement issues would likely arise, due to the location and nature of the terrain where new fence locations might be logistically placed. There is potential for conflicts with wild horse incursion into an existing permitted livestock allotment. The current north boundary fence is in a good location due to its connection to natural barriers and reduction in overall expense and maintenance.

To change current Forest Plan direction requires full public involvement and tribal consultation for a highly controversial Forest Plan Amendment. Public interests range from one extreme to the other relative to the management direction for the area in question. The time and effort to complete consideration of this alternative when no identified need exists to consider forgoing other very important resource values is not in the public interest. For the above reasons, the Forest Service would prefer to see other options explored for consideration in the upcoming revision of the herd plan.

Horse distribution has varied over time. However, due to winter range concerns in the mid-1980s, the horses were hazed to higher elevation range, creating a major summer distribution shift to the higher elevation. More summer horse use was further shifted into the higher elevations in the early 1990s when the Sorenson Extension was withdrawn from wild horse use. The pressure on the north boundary is evident. Changing horse distribution behavior is desired through fence repair / extension on the north boundary and any temporary hazing that might be necessary. The Forest Service needs the north boundary of the PMWHR to be a more effective

barrier through proper design, alignment, and repair of the existing buck and rail fence, and construction of about a half mile buck and rail drift fence to the southwest of the existing fence. Strategically placed snow fence might also be a consideration to help mitigate horse travel on snowdrifts that occur over the fence.

The Forest Service would like to see the herd plan revision address range improvement options (such as winter range expansion, prescribed burning, mechanical treatments, seeding, water management, or trail construction into areas of limited to no use) that improves rangeland condition, creates new available forage, and shifts distribution patterns. The Forest Service believes this would provide opportunities for a thriving ecological balance and not jeopardize the wild and free roaming character of the herd.

In the interest of continuing these discussions, when might we get together in December or January? Also, could you provide me with a copy of the peer reviewed publications) that Linda indicated was available regarding genetically sustainable herd numbers for the Pryor horse herd? If you have questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Nancy T. Curriden".

NANCY T. CURRIDEN
Forest Supervisor