



In Reply To:

# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

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June 28, 2006

### Memorandum

To: State Director, Montana State Office

From: Field Manager, Billings Field Office

Subject: Rationale for Releasing the Record of Decision for the Pryor Mountain Wild Horse Range Population Control 2006 (EA # BLM-MT-010-FY06-19) as "Effective Upon Issuance".

I have developed the Record of Decision and Finding of No Significant Impact (FONSI), describing the Bureau of Land Management's decision to support the Pryor Mountain Wild Horse Range Population Control 2006. The proposed actions were described in Environmental Assessment #MT-010-FY06-19. This document was released for a 30-day comment period, and BLM received 179 documents (520 pages of comments). Forty of 179 comment letters received were considered substantive. Substantive comments are those which question, with reasonable basis, the accuracy of the information in the EA or the adequacy of, methodology for and/or assumptions used in the EA.

### **I. DECISION:**

I have made the decision to apply fertility control to all mares 11 years of age and older (24 mares in 2006) for the purposes of suppressing herd growth rates. Seven mares 16 years of age and older have already been treated with the Porcine Zona Pellucida (PZP) vaccine for at least one year and would continue to receive annual boosters for the remainder of their lives. Thirteen mares 12-15 years of age have also been treated for at least one year and would continue to receive annual boosters through 2010. All mares that are 11 years of age would be added to the treatment program each year (four mares in 2006 and an estimated five mares in 2007, six mares in 2008, six mares in 2009 and four mares in 2010). Fertility control application is scheduled to begin no earlier than July 10<sup>th</sup>, 2006, and will continue annually through 2010. Treatment with contraceptives using the proposed protocol is predicted to be roughly 50% less costly than gather and removal population control (Bartholow, 2004).

#### Mitigation Measures

- Treatment of 11 year old mares would be suspended for at least one year if the surviving foal crop (from the year before) falls below 25% of recorded foals.
- Treatment of 12-15 year old mares would be suspended for at least one year if the surviving foal crop (from the year before) falls below 10% of recorded foals.

In addition, I have made the decision to capture and remove a maximum of 22 age-specific wild horses from the PMWHR. An estimated 11 bachelor stallions (4-8 years of age) and 11 yearlings have been determined excess and would be removed due to the need to reduce wild horse grazing impacts on the

PMWHR. The method of capture will be bait-trapping which is scheduled to begin no earlier than July 10<sup>th</sup>, 2006, and may continue through September 30<sup>th</sup>, 2006 as necessary. Bait-trapping and removal of individual horses reduces impacts on the herd and is predicted to be 75% less costly than helicopter gathers.

Mitigation Measures

- As with previous selective removals, the intent is not to remove any horses that are harem stallions or core breeding-age mares (6-10 years old) from the herd (see Appendix 1).
- The selection of individual horses to be removed may depend on a given animal's susceptibility to the bait-trapping effort. The intent is not to remove more than 50% of the horses from any given age class within the herd.
- Any additional removal activity in subsequent years (beyond 2006) would require a further determination of excess animals based on utilization, trend and climate data.

All excess horses will be available for adoption by a sealed-bid competitive process to qualified and pre-approved individuals as determined by the Billings Field Office (BiFO). The minimum bid will be \$125 per horse. Timing of the adoption will be determined by the completion of bait-trapping efforts. Further details will be communicated to the public via a press release.

**II RATIONALE FOR “EFFECTIVE UPON ISSUANCE”**

Herd Objectives

The Pryor Mountain Herd Management Plan (HMAP, BLM-MT-PT-84-019-4321/June 1984) and the Billings Resource Management Plan (RMP, Sept. 28, 1984) established an initial stocking rate for the range at 115-127 wild horses. AML was revised in July 1992 and set at 85-105 adult horses (MT-025-2-18).

Since 1996, the Pryor Mountain wild horse herd has averaged 140 adult horses and 24 foals. Annual herd growth from 1996 through 2005 averaged 7% (EA # BLM-MT-010-FY06-19, Section 1.7). The Pryor herd currently consists of 138 horses (2 years and older) and 22 yearlings for a total of 160 adult horses. This total currently includes 9 horses that have not been sighted this year. The herd is expected to produce up to 38 recorded foals in 2006, including 24 surviving foals to date. Herd sex ratio is currently 89 female and 95 male horses.

Population controls, scheduled for 2006, will reduce herd size by 22 horses (table 1), and reduce herd recruitment to an estimated average of 4% annual growth (2008 through 2012). This will leave the herd approximately 23 horses over AML.

**Table 1: Estimated PMWHR Herd Demographics 2006**

<b>Y e a r</b>	<b>F o a l s Born</b>	<b>F o a l s Surviving</b>	<b>A d u l t Deaths</b>	<b># H o r s e s Removed</b>	<b>T o t a l Herd Size</b>	<b># H o r s e s Over AML</b>
<b>2006</b>	<b>38</b>	<b>27</b>	<b>10</b>	<b>22</b>	<b>155</b>	<b>23</b>

- **AML reported as the upper level of a range (85-105) of adult horses (MT-025-2-18)**

Genetic research (Cothran and Singer, 2000) suggests that maintaining an average of 140-150 total horses (including foals) may facilitate long-term maintenance of genetic diversity within the herd. BLM historical data suggests that a herd size averaging 143 horses over a 32 year (1971-2005) period has supported a genetically diverse herd in the Pryors (Cothran, 2002). BLM management removals in 2006 will not reduce total herd size below an estimated 155 horses (table 1) which will include an estimated 27 surviving foals. As a result, we expect 2006 population controls to have minimal impact on herd genetic diversity.

### Habitat Objectives

Habitat objectives in the HMAP are to manage for a slight upward trend in range health (HMAP, BLM-MT-PT-84-019-4321/June 1984). Cumulative impacts, including weather, drought and grazing, have resulted in the apparent trend being down on 76 percent of range transects (Ricketts, 2004). Grazing impacts, over the last decade, have been light (20%) to moderate (60%) under an average total herd size of 164 horses (EA BLM-MT-010-FY06-19, Section 1.9). Impacts which exceed a proper-use factor of 40% are considered unacceptable under management objectives to allow for improving range conditions (Ricketts, 2004; Vallentine, 1990). Research has also shown that grazing impacts limited to moderate levels (~40% utilization) during and after drought did not adversely affect the sustainability of dominant native range grasses on Montana rangelands (Eneboe et al, 2002).

### Drought Impacts

Severe drought conditions have been present over most of Montana for four or more consecutive years. Long-term drought impacts continue to exist in areas where short-term relief may be present or develop. The US Drought Monitor, and Montana County Drought Status (<http://nris.state.mt.us/Drought/status>) still indicate moderate drought conditions for the PMWHR area. Increases in monthly precipitation summaries (from 70 to 100% of average) have resulted in improved forage response and growth on the PMWHR in 2005 and 2006 (refer to <http://www.cbrfc.noaa.gov>). However, several years of consecutive drought have decreased plant health, vigor, and forage production, and long-term range recovery will take more than one or two seasons of near normal precipitation.

Forage utilization levels during the past winter were recorded at 23 to 54 % (average of 37%) under impacts from 160 horses. Available research suggests that continued grazing at pre-drought levels, during moderate drought, is probably the greatest cause of range deterioration (Vallentine, 1990). Reduced grazing levels, however, during and following moderate drought should result in less damage to the forage base and hasten its recovery.

### Summary

Population controls are necessary in 2006 to limit herd size and to continue to decrease forage demands on drought-stressed resources. Releasing this decision as "effective upon issuance" will avert staying the action through possible appeals.

Range recovery from documented cumulative impacts may take several years of reduced grazing impacts, near normal precipitation levels and effective range improvement projects. Additional bait-trapping and removals may be proposed for 2007 as range conditions, utilization impacts, drought conditions and budget impacts dictate. Trend studies, which are used to evaluate long-term changes in the cover and composition of the forage, will continue to be re-evaluated at intervals of 5 to 10 years.



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