

RE: DOI-BLM-ORWA-B050-2018-EA, Spay Feasibility and ON-range Behavioral Outcomes Assessment and Warm Springs Herd Management Area (HMA) Population Management Plan.

Jeff Rose (Burns District Manager) and Lisa Grant (Wild Horse and Burro Specialist),

Thank you for the opportunity to engage in scoping prior to the time, energy and resources being expended to create the proposed action.

- The action proposed is simply premature. The components required for analysis to determine any basis for a determination of appropriate action simply do not exist at this time. In order to begin the analysis for this “research” a Herd Management Area Plan (HMAP) would be a required (appropriate) document to tier any discussion. An HMAP is a document outlined in the Wild Horse and Burro Handbook (as amended, H-4700-1) as a cornerstone to determine long term objectives for both herd management and resource preservation. In this instance no such document exists to determine if the proposed study even fits into established and approved objectives that have been scrutinized through the NEPA process. In essence this study puts the “cart before the horse.”
- The analysis proposed is inadequate. The scope of analysis on such a proposed action would need to include any potential application, the legality of that potential action and cost analysis that includes implementation and litigation (the proposed action is unacceptable to the majority and will inevitably face repetitive legal actions). In addition, included in analysis would be the necessity of addressing the impact to overall population dynamics and the impact to the individual animal and harms to individual citizens associated with such. The process for such a project would not be appropriate under an “Environmental Assessment” and require an Environmental Impact Statement (EIS).
- Any research that makes any pretense referencing measurable horse population behavior changes would require that extant horse population behavioral analysis be compared to an existing bank of ethograms over an extended period that encompasses impacts from varied precipitation, temperature and human impact (recreation, livestock, mining) as a basis for accuracy. A herd of wild horses has a distinct social structure well beyond a family band or a subset population; impacts to any single component of the larger structure must be weighed. A minimum of 5 years of structural ethograms would provide a basis for discussion and would need to be completed prior to any introduction of non-reproducing females. (Observational information was performed at Sheldon NWR over a period of years. Aggressive behaviors increased as the number of non-reproducing anestrus females were introduced; competition for mares increased.)

Surgical spaying is an expensive and dangerous procedure. This procedure is only done in a domestic setting under extreme circumstances in a highly controlled environment. In the field only older mares that have successfully contributed to the genetic baseline of the herd would be legally appropriate candidates for this procedure. Older mares, even in a highly controlled hospital environment, are not good candidates physically or psychologically for this procedure.

Prior to a discussion involving any research, the application of any tool created from that expensive and dangerous research, must be thoroughly evaluated to justify the expense.

Thank you,
Laura Leigh
for Wild Horse Education