



WILD HORSES OF AMERICA
FOUNDATION

23 October 2017

Mr. Matt Preston
Bureau of Land Management
Salt Lake Field Office
2370 South Decker Lake Boulevard
Salt Lake City, UT 84119

Re: Population Control, Gather, and Research for the Onaqui Mountain Wild Horse Management Area Project.

Dear Mr. Preston,

Thank you for the opportunity to deliver my comments and thoughts regarding the proposed gather and removal of a significant number of horses from the Onaqui Mountain Herd (Onaqui).

Wild Horses of America partners with the BLM to deliver PZP treatments to mares of the Onaqui herd with the intent of stabilizing herd growth so that it can be managed on the range, thereby precluding gathers and removals. Due to this work, I spend a lot of time on the Onaqui range with BLM employees, photographers, horse advocates and others who are interested in seeing our wild horses in their natural environment.

We feel that the proposal to reach low Appropriate Management Level (AML) by removing over 325 horses would be devastating to the dynamics and health of the herd, and to the people who regularly follow, observe, and visit the Onaqui Mountain Herd.

Additionally, given that the future of the wild horses in holding is unknown at present, and that they might be euthanized/killed/slaughtered (pick your euphemism), I do not want to see a significant portion of the herd removed and sent to an unknown fate.

THE VALUE OF WILD HORSES

While some question the value of America's wild horses and burros since they do not often put dollars directly into anyone's pocket, I believe that they provide great value to those who are uplifted by observing wild horses in their natural habitat. Plus, there is value to those who are unable to visit our wild horse herds, but who enjoy following

them online, or just knowing that they are out there living in the “wild west” and adding to that imagery.

“That Congress finds and declares that wild free-roaming horses and burros are living symbols of the historic and pioneer spirit of the West; that they contribute to the diversity of life forms within the Nation and enrich the lives of the American people...”

Wild Free-Ranging Horses and Burros Act of 1971

The Onaqui Mountain Herd is very popular with wild horse advocates, photographers, ATVers, campers, tourists and others who like seeing them in their natural setting in our west desert landscape. It is becoming increasingly rare for us to be out on the range with the horses and not encounter other observers, often many other observers. And, the people we meet often have traveled from other states with the specific goal of seeing our famed herd.

To offer an idea of the herd’s popularity, and the interest level of the public regarding the Onaqui, our group’s Facebook page, which primarily features photographs and information about the Onaqui herd, has approximately 14,000 followers. And our group is on the smaller end of the spectrum when compared to other wild horse advocacy organizations, whose followers number in the hundreds of thousands, who have sent representatives to visit and report back on the Onaqui.

We also have some talented local photographers who feature the Onaqui horses on their Facebook pages:

Kent Keller Photography has about 16,000 followers.

Kelly Jay Photography has over 11,000 followers.

Dirk Johnson Photography has over 2,500 followers.

Lynne Pomeranz Photography, though being based out of state, has about 5,000 followers and hosts photography summits on the Onaqui range.

Kimerlee Curyl Photography, also from out of state, has close to 8,000 followers, and comes to Utah a couple of times per year to photograph the Onaqui horses.

If you haven’t visited their pages, I encourage you to do so – they are incredibly talented artists!

Wild Horse Tourist, a website that introduces people to Utah’s wild horses and burros and gives directions about where to see them, had 2,700 page views over the 30 days

prior to 20 October 2017, and 21% (432) of those views were for the Onaqui Mountain Herd.

A couple of years ago I ran into a United States Congressman who said he likes to photograph the Onaqui as an escape from his busy life.

It is not uncommon to see employees of the National Ability Center (which works with disabled veterans) enjoying the horses, and sometimes they bring veterans to the range.

It is clear that the herd has value to those who follow it.

Much of the appeal of the Onaqui herd, particularly when compared to other wild horse herds, lies in its proximity to the sizable population of the Wasatch Front and the accessibility of an international airport. Good roads throughout much of the range, and the fact that the horses are relatively accustomed to the presence of people allows much closer viewing opportunities than most other wild herds.

The importance of the horses' approachability and accessibility can be summed up by the fact that Dirk Johnson, whose photography is mentioned above, is able to approach the herd and take great photographs. Dirk is a paraplegic, and is restricted to his vehicle when on the range.

The accessibility of the Onaqui horses was further exemplified recently when CBS News (national) sent a correspondent to the Onaqui range to film a segment about wild horse issues in the west. It is scheduled to air on 26 October.

The Onaqui Mountain Herd is increasingly driving tourist dollars to our state, and to Tooele County. I believe that these wild horses are a significant tourist destination for Tooele County, and that they can help (along with ATV and hunting opportunities, and visits to Bonneville Speedway) deliver dollars to this region.

Since the announcement of the gather proposal, I have already heard from a number of people who follow the Onaqui who said they would be much less inclined to visit the herd if the herd size were greatly diminished. A smaller herd size (especially a significantly smaller herd size) would mean fewer horse sightings, more difficult access to horses, and less satisfied viewers.

Even though I am usually successful at finding the wild horses on any given day, there are still days when I have a difficult time finding any and I start to wonder, "Who stole all the horses?" Also, I am decently fit and can reach them even if they are grazing in areas where there are not roads (such as on the top of Davis Mountain). But, for many people, hiking long distances in rough terrain is not an option. Fewer horses, means fewer opportunities for people to see them.

Since recreational value is an important consideration when it comes to management of the range, we ask that you remove as few horses as possible (certainly not “over 325”), and that you carefully select which horses/groups are removed, so that the value of this herd is not decimated.

Given the notoriety of this herd, I suggest it is a good candidate in the future to be re-designated as a Range, which would complement the four other wild horse Ranges in the west, and further increase the herds’ contribution as a tourist destination.

THE ONAQUI MOUNTAIN HERD(S)

Although the total wild horse count for the Onaqui may be 450 (plus the 2017 foals), the Onaqui Mountain Herd is comprised of at least four major groupings of horses that tend to stay fairly segregated from one another.

Davis Mountain Group – This is the largest, and probably most popular, group. These horses usually stay north of the Pony Express Road and often are on-and-around Davis Mountain. They also venture up to the Dugway fence on the north, and to the east as far as the Terra Road through the area where the fire was this summer. I would estimate that the horses in this area number around 180* horses.

Simpson Springs Group – These horses tend to stay to the south of Simpson Springs, and to the west of the Simpson Mountains. My estimate is that there are approximately 130* horses in this group.

East Onaqui Group – This group stays to the east of the Onaqui Mountains and west of Highway 36. They are difficult to approach, and act much more like typical wild horses when it comes to keeping distance from people and vehicles. When I did an aerial count last year I estimated 50-60* horses were in this area.

Erickson Pass Group – I don’t know much about this group of horses. My best guess, based on conversations with people who know more, is that there are about 30-40* horses in this group.

Miscellaneous Groups/Solos – There are also various solo horses, and small groups spread throughout the range, and down toward Keg Mountain. This “group” may have about 40-50(?) horses.

*Note: These are rough estimates. Precise numbers are not necessary to validate the points made, below.

THE GENETIC IMPACTS OF REMOVING OVER 325 HORSES

If the gather proceeds as proposed and over 325 horses are removed, that would mean an overall herd reduction of approximately 72%! And, this percentage will increase if the herd count is higher and more horses are removed. The Groups mentioned above are very important when it comes to determining any removal numbers, particularly when you consider the importance of genetic viability.

With an equal spread, a 72% reduction would reduce the Onaqui Mountain Group to about 50 horses, the Simpson Springs Group to about 36 horses, the East Onaqui Group to about 17 horses, and the Erickson Pass Group to about 11 horses.

While there is certainly room to debate the exact numbers, the overall point remains: Many of the Groups that make up the Onaqui Mountain Herd would be at numbers that would not sustain genetic viability.

The BLM's lead equine geneticist, Dr. Gus Cothran, believes that herd sizes need to be, at a minimum, between 150-200 animals.

"The Cothran studies are excellent tools for BLM to use in managing herds to reduce the incidence of inbreeding..."

National Academy of Sciences 2013 Report: Using Science to Improve the BLM Wild Horse and Burro Program – A Way Forward (p. 192)

It is clear that downsizing to low AML (121 horses) would be far too low from a genetic viability concern for the entire HMA. And, the prognosis is much, much worse when you consider the potential impacts to the segmented groups of the Onaqui that remain mostly separated.

While it is a good thing that the BLM takes hair samples during gathers to assess the genetic health of the herd, and that the BLM can introduce horses to broaden the gene pool if needed, it is clear that the proposal to reduce the Onaqui to low AML would set the herd up for genetic problems, and probably the future reintroduction of horses to broaden the gene pool. It seems simpler to just leave more of the existing horses on the range.

RESOURCE ALLOCATION

The Onaqui horses are generally in very good condition. (Some have commented that they are tending toward being a bit plump.) There is no indication that any of the Onaqui are thirsting or starving, which runs contrary to the narrative that some people are pushing as a reason to increase the number of removals from HMAs in general.

The current 450 horses spread throughout the 240,153 acres of the HMA equates to over 533 acres per horse! Low AML, which is 121 horses, would equate to almost 2,000 acres per horse. Either figure is a low stocking rate. On that same range we have thousands of cows grazing (6 months out of the year), and thousands of sheep moving through the Pony Express Road corridor.

The greater Onaqui Herd Area of 507,681 acres, which includes range where some of the horses roam, indicates that the acres per horse figure is even higher. (Incidentally, the BLM's Onaqui website page shows the HMA range at 507,681 acres, which is actually the figure for the Herd Area.)

There are good relationships between the ranchers, advocates and BLM employees who are involved with the Onaqui horses. We do not have the conflicts that are common in other HMAs. There is enough forage to go around, and the ranchers are good about leaving water turned on for the horses.

In your letter dated 27 September 2017 (Re: Population Control, Gather, and Research....) you stated that "...resource impacts due to the over-population of wild horses..." is one of the reasons for the removal. I spend a lot of time on the range, and I think one would be hard-pressed to point to any direct damage that could be resolved by reducing the number of horses. While I am not advocating a reduction in cattle or sheep AUMs, if there were problems with the health of the range I would think that you would need to take a hard look at all of the users and their relative impacts. The one, obvious problem with the Onaqui range is that it is replete with cheat grass. But, I doubt this can be laid at the hooves of the horses.

Based on resources, the Onaqui is definitely an HMA that could (and should) have its AML raised. Given the history of how AMLs have been assigned to our HMAs, and the sometime arbitrary nature of the figures (as pointed out in the National Academy of Sciences report to the BLM in 2013), I think that a reassessment of the Onaqui range is necessitated.

"The Secretary shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands. He shall consider the recommendations of qualified scientists in the field of biology and ecology, some of whom shall be independent of both Federal and State agencies..."

Wild Free-Ranging Horses and Burros Act of 1971

On the topic of range preservation, there is evidence of frequent off-road driving on the Onaqui range. Sometimes this is manifest by the simple growth creep of existing minor roads that now go farther than they used to, and sometimes it is more blatant when people drive across a completely road less area. The BLM Law Enforcement Officer (LEO) for this area has been great about calling and warning people when she

hears about off-roading. I think that the off-road activity could be reduced by: maintaining and posting more of the small signs at the beginning of minor tracks that advise people to stay on existing roads (I understand that these are often knocked down, shot, or run over), creating a PR campaign to spread the word through local media and groups (ATV clubs, off-road clubs, hunting groups, etc.) who can reach people who frequent these areas, and tasking BLM employees who are in the field to politely remind people to please stay on the roads (I understand that this might be more of a job for the LEO, but most of the people I encounter on the range are pretty receptive.) I think much of the damage is being caused by ignorance rather than malicious intent.

FIRE

In regard to the wildfire that burned part of the Onaqui range this past July, just under 38,000 acres (per Inciweb.nwccg.gov) were lost, which is about 11% of the HMA, and about 7.5% of the HA. The Davis Mountain Group of horses is the only group that is affected by this reduction in forage, and they still seem to be quite healthy.

Fire-damaged range should not be a reason to reduce the number of horses, and particularly not for a reduction to those groups of horses that never visit the fire-damaged part of the HMA.

I am encouraged to hear that the BLM is going to try to kill off any emerging cheat grass in the burn area, and work to restore native grasses to this area. The building of a temporary fence to protect the area as it reestablishes could be a good solution. Using water to draw horses, cows and wildlife to other parts of the range could help also. (Until about a month ago the Onaqui Mountain Group was on the south side of Davis Mountain a number of miles from the burn area. They only returned to the burn area when their water source was changed. Lately, after watering at a trough within the burn area, they walk/run miles to spend their days on the low hills north of Davis Mountain where the range was not burned.)

GREATER SAGE GROUSE

One of the reasons specified in your letter for a large removal is compliance with the plan to protect sage grouse habitat and populations. Like most wild horse advocates, I also want to see range allocated for wild animals beyond horses.

In all of the time I have spent following horses on the Onaqui range I do not remember ever seeing a sage grouse. Maybe this is a bad indicator? Or, maybe it means that the horses are not usually in sage grouse habitat?

If indeed there is a trigger on the sage grouse plan that mandates going to low AML, there really needs to be a strong look at cattle and sheep as well. Again, I am not advocating a reduction of cattle or sheep AUMs, but there are thousands of cattle on

the range from November through April, and thousands of sheep that get pushed along the Pony Express Road.

After review of a detailed sage grouse map provided by the Utah Division of Natural Resources, it is clear that the sheep go through sage grouse areas classified as “general habitat” and “nesting and brood-rearing” areas in very dense bunches and cover a wide swath of ground. The sheep are much more prone to eating a wider variety of forage, and since they are unable to wander freely their impacts are more substantial on a more focused area. If the goal is to keep grass at least 7” tall, or higher, then it is clear that they are likely having a higher impact on the habitat around the Pony Express Road, than are the Onaqui Mountain and Simpson Springs horses that also graze there.

Per the Utah Sage Grouse SRMPA, fencing off select areas to minimize the impacts of cattle, sheep and horses, implementing noise restrictions, and the reduction of traffic, may be acceptable alternative methods of enhancing the sage grouse habitat.

In regard to the wild horses, I think it makes sense to assess their impact by the Groups I delineated above.

The Davis Mountain Group generally stays north of the Pony Express Road (the general boundary of the Sage Grouse habitat south of Davis Mountain). While the horses do go south of the road on occasion, I would estimate that they spend under 5% of their days there. Toward the east, in the area just west of the Onaqui Mountains, the horses are sometime in that section of the delineated sage grouse habitat, but again, they do not spend a lot of time in that area, and much of that area has been denuded by the recent fire. Overall, I would say this group has minimal impact on the sage grouse habitat.

The Simpson Springs Group has more sage grouse habitat in the areas where they tend to spend time than what is to the north in the Davis Mountain area. While they do go on the east side of the Pony Express road, toward the Simpson Mountains, I do not typically see them in big groups higher up on the steppes. The Group is often more fragmented than the Davis Mountain Group, and I usually only encounter smaller herds in the sage grouse area. Many of the horses stay to the west of the Pony Express Road, which is not within the designated sage grouse habitat.

The East Onaqui and Erickson Pass Groups are in sage grouse habitat, as marked on the BLM map titled, “Onaqui Mountains Wild Horse & Burro Areas With Sage-Grouse Habitat.”

If sage grouse habitat is a motivation for the gather, then it might make sense to focus on the horses that live primarily within the sage grouse habitat. The Davis Mountain and Simpson Springs Groups should be left alone as they have minimal impact.

Another consideration would be to focus on removing, or moving, horses from the areas where there are the highest concentrations of sage grouse activity. My understanding is that the higher concentrations are closer to the Sheeprock Mountains, which is not where most of the Onaqui horses range.

On another note, it seems ungrounded to propose a drastic reduction to any HMA based on sage grouse protection when the BLM recently announced its intent to officially reexamine its sage grouse protection plan. Any gather plans based on sage grouse habitat should be suspended until we have clear direction as to the future of the protection plans.

Further, it seems ironic that the Onaqui is facing a drastic reduction in numbers in the name of sage grouse habitat protection, when the BLM/Department of the Interior just announced that 10,000,000 acres across six western states (including Utah) will not be protected as sage grouse focal areas so that mining interests can proceed.

“The BLM determined the proposal to withdraw 10 million acres was unreasonable in light of the data that showed that mining affected less than .1 percent of sage-grouse-occupied range...”

BLM.GOV

One could make a similar argument that a good portion of the Onaqui herd has little impact on sage grouse habitat.

PZP (CONTRACEPTION)

As mentioned above, Wild Horses of America partners with the BLM to treat the Onaqui mares with PZP delivered by darts. These PZP treatments started in September of 2015, so we have completed two years on this project.

Of course, it takes time to stabilize a population through the use of contraception, but once it happens we will be in a very good place. Gather and removals will be farther and fewer between (if at all), and the end result will be a big savings to the US taxpayer and a boon to the horses who can remain on their native land.

In FY17 (Fiscal Year 2017) we delivered a total of 53 doses (primer and booster), with a total of 39 mares being fully treated.

The unofficial goal for FY18 is to fully treat 60 mares, with the informal goal that treating more is very acceptable. I do not think that 60 is high enough, and would like to see this goal officially increased to 80-90 mares fully treated in this coming year. And, to increase that number as needed in future years until we gain control of herd growth.

Combined, the Davis Mountain and Simpson Springs Groups account for somewhere over 300 horses. These two groups are generally fairly easy to find, and easy to approach on foot. We can get to them and dart them!

The other Groups tend to be more difficult to approach. With that said, we have not tried to dart them yet. If they cannot be approached close enough to dart them, or if we cannot stake them out at water holes, we need to consider water/bait trapping so we can treat and release.

On the subject of cost, lately I have heard the figure of \$2,600 being spread around as "the cost to treat each horse with PZP." To the uninformed, this implies that darting horses with PZP is expensive! However, the \$2,600 cost only occurs when the BLM gathers a horse by helicopter, treats it with a primer dose, holds and feeds the horse for a few weeks, treats it with a booster dose, then returns it to the range.

The cost to treat a mare in the field is the price of the dose plus the price of the dart, which is just under \$30 per dose. Plus, the time and costs for the darter and observer. When a volunteer is used, such as from our group, there is no added cost to the BLM.

Controlling horse populations in the field by darting with PZP is far more cost effective than gather and removals, where a helicopter gather averages about \$1,000 per horse, and then you have to add the cost of keeping a horse in holding.

When the BLM darts a horse, or accompanies our group in the field, as is often the case, the BLM has to apply some hours and vehicle costs to that total cost figure. While this means each dose will cost more than \$30, there is no way that figure could remotely approach \$2,600 per horse. While I hear there is a cost code for employees to track the time they spend darting, my understanding in talking with a few different employees, is that it is not done with perfect accuracy. It would be great if the BLM tracked these costs so that accurate costs per treatment could be computed and shared.

Our group is willing to spend more time and money (at no cost to the BLM) to dart as many horses as needed to control herd growth. One way to increase darting efficiency, and reduce the costs to the BLM, is to allow our group to have more autonomy in the field and not be accompanied by BLM employees as frequently as we have been in the past. This would be a similar structure to how other darting programs are being implemented in BLM-managed herds.

While it has been good to have the up-front involvement of BLM employees as the program has been launched, it has also caused some slowdowns due to their having other work obligations, limited hours that they can spend on the range on any given day, and the lack of freedom in their schedule to always take advantage of windows of good weather that facilitate successful darting. With autonomy, our group could pick a number of days in a row where we could camp on the range and dart horses from sunup to sundown. Of course, we would still work closely with the BLM to identify

which mares to start on a treatment plan, and to report all of the mares we have darted.

As we heard from numerous people at the most recent Wild Horse and Burro Advisory Board Meeting, we need to be using more PZP! We want to help you accomplish this.

Wild Horses of America is working toward the goal of converting our field darting notes and pictures to being housed on a phone app that can be used in the field. We believe that it will enhance our ability to find and identify horses that need treatment.

I would like to see no horses removed from the range and allow the contraception treatments to gain control of herd growth. While our group does not subscribe to a “let them run free” type wild horses advocacy, I do believe that the Onaqui range can sustain the current number of horses.

I firmly believe that we can continue to improve the contraception management plan for the Onaqui to the point where it not only successfully controls herd growth on the range, but also serves as a model that can be implemented in other HMAs in the state.

PROPOSALS...

Should a gather commence, we strongly suggest that the following be considered:

1. That the number of horses of removed should be far, far fewer than the “over 325” mentioned in the scoping announcement. At very minimum, high AML should be left on the range. Over 300 horses, if carefully selected, would maintain most of the integrity of the herd.
2. That helicopters will not be used. Bait trapping is generally a more humane way to gather the horses, and it may have fewer impacts on the horses’ future adoptability. Also, this will allow fewer numbers to be removed at a time, and horses that do not fit removal criteria can be released after having a less traumatic experience.
3. That a natural male/female balance is considered when deciding which horses to remove and which horses to release back the range. Do not use sex loading (too many male horses) as a method of trying to reduce the reproductive rate. Use PZP for that.
4. That any horses that are removed will be transferred to a suitable private sanctuary* in Utah, if one is available. And/or, that the BLM will work with local advocates to ensure that every horse is adopted (this should be facilitated by the slower removal of trapping), and only bring horses off the range at a rate sustained by adoptions.
5. That emphasis be placed on removing:
 - a. Horses that are less acclimated to people, that range in areas less visited by the public, and that are in the sage grouse habitat area. This

- will maintain the size and viability of the groups of horses most visited by photographers and observers, and will allow for easier PZP darting.
- b. Horses that are younger and therefore better candidates for adoption. (Older horses may be more habituated to life on the range, and less adaptable to a new life of domesticity. Also, they will not be entering their breeding years, and will be more likely to die sooner from natural causes, which will help to naturally control the herd size.)
 - c. Focus on Groups (as defined above) of horses, as opposed to removing an even spread across all the Groups on the range. This will help retain the genetic viability of the remaining Groups, which will retain larger numbers. Horses in high priority sage grouse habitat should be chosen first.
6. To have a plan to treat with PZP any horses released back to the range.

*Private Sanctuary: Wild Horses of America is currently pursuing a few different properties in northern Utah that can be converted to use as a wild horse sanctuary.

General proposals:

1. Fully (primer and booster) treat at least 80-90 mares with PZP in FY18, and plan to adjust that figure up in subsequent years as needed to gain control of herd growth.
2. Implement PZP treatment strategies such as bait/water trapping, as needed, to treat mares that are too difficult to dart remotely by rifle.
3. Implement methods to reduce the amount of off-road travel that is occurring on the range to enhance conditions for all users.
4. Reassess the current AML (121-210 horses) using the latest and best scientific practices.

Thank you for the opportunity to offer my thoughts on the proposal.

Overall, I think that the BLM employees in Utah do a great job with managing the wild horses and burros on our public ranges. I have found you to be knowledgeable about the horses, caring about the horses, and willing to interact and have discussions with people who have varied opinions. It is very much appreciated! I often hear your praises from various horse advocates who are from other states.

I appreciate your consideration,

Jim Schnepel
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