

The International Society for the Protection of Mustangs and Burros (ISPMB) is grateful for allowing us to comment on this scoping document. If NEPA requires a **hard look** then we must look at new evidence which shows that the Agencies (BLM and FS) should be looking at these new understandings in wild horse management that could impact not only the environment but could save taxpayers millions of dollars.

ISPMB hopes our documentation will do just that. That our” comments may lead to the development of new alternatives, the analysis of new or different issues, and provide sources of information which the BLM can reference when conducting the analysis of effects.” This evidence is based on ISPMB’s many years of understanding wild herd behaviors, growth rates, and what leads to stable populations. This understanding came from ISPMB’s two herds we managed for nearly eighteen years that had not been rounded up, one in fifty years and the other in 25 years, with the exception to be moved to ISPMB. It was this lack of disruption over all these years that led ISPMB to understanding how important this is in managing wild herds.

Stable populations limit their own growth because of the stable band structures and tremendous respect for the older and wiser animals in charge. Under the best of feed conditions, the average yearly growth rate was 9.73% for our Gila wild herd and 8.33% for our White Sands wild herd. Both herds were under 10% growth. Two scientists from the National Academy of Sciences of 1980 reported wild herds growth rates would be well under 10%. ISPMB noted that our Gila wild horse herd **worked together for the good of the entire herd**. In speaking with Dr. Dan Rubenstein of Princeton, a renowned expert in equine behavior, he stated he had not witnessed this behavior. One such behavior ISPMB witnessed was band stallions preventing a young filly from getting pregnant by bachelors even though the filly was not from their bands. These fillies did not foal until they were 4 and 5 years old. *In disrupted herds*, fillies are pregnant at 2 and foaling at 3. Young bachelors had extreme respect for these elder stallions and mares.

In disrupted herds, this respect is missing because younger stallions are in charge. Many of these younger stallions aged 6-9 are juvenile in their behaviors, equivalent to young boys who are still in middle school grades or high school. Studies have shown early on in the late 1970s in the Red Desert, the youngest band stallion was approximately 13 years old according to researcher, Mary Ann Simonds. ISPMB is the oldest wild horse and burro organization in the United States, and along with our first president, Wild Horse Annie, was responsible for the passage of the Wild Free-Roaming Horses and Burros Act of 1971. We have historical facts that cannot be refuted from our more than seventy years of archives.

It was ISPMB who actually began an adoption program in Montana in 1968. This concept was given to the Agencies and a national adoption program was initiated in the early 70’s. If ISPMB should disagree with the Agencies statistics, it is only done for clarification of facts and to assist the Agencies. For instance, when the first counts were completed in 1974, the actual visual counts were 57,040 wild horses and burros on BLM lands and 2,823 animals on FS lands. That is nearly 60,000 animals and disputes the “estimated” count by the BLM of 25,345. Please note that technology was not advanced at that time and visual counts could be underestimated by 50% which means there were many more animals than first observed.

It has always been ISPMB’s goal to assist the BLM and FS and to bring the truth forward about wild horses and burros. Hence, ISPMB has spent many years understanding wild horse herd behaviors which we hope to share. It is important to note that a study of wild horse herd behaviors recommended by the National Academy of Sciences in 1980 was never done. This study would have allowed the Agencies to

understand these animals as the wildlife species they are. We would have understood that rounding up populations every four years leads to increased populations and injury to stable band structures of wild horses which leads to dysregulation. The WinEquus program that started in 1996 was developed using data from disrupted herds showing that herds double every four years and grow at a rate of 19.6% yearly. ISPMB can show that after four years of disruption, herds begin to stabilize once again. Because roundups happen every four years, this stabilization can never be achieved. There is only one herd left on public lands that has not been disturbed with roundups over twenty plus years and this herd should be studied. Their growth rate is under 3%.