

Clark Burros-
Craig Downers Input

12/28/06

Bureau of Land Management
Needles Field Office
Needles, CA

Re: BLM's Proposed Zeroing Out of Clark Mtn. Burro Herd Management Area
Attn: Needles BLM Field Office Manager; BLM Calif. State Wild Horse and Burro Director
Tom Pogacnik; U. S. Secretary of Interior, Kirk Kempthorne

Dear Sir/Mame:

Happy New Year!

I have just considered your Environmental Assessment and Capture Plan for the elimination, or "zeroing out", of the historic Clark Mountain Burro Herd Management Area and strenuously protest this great injustice to the wild burros! These wise and hardy desert survivors deserve much more respect and appreciation! In your E.A. you do not really present facts and figures that would convince me that the burros are harmful to the endangered desert tortoise and to the rest of the Mojave desert ecosystem, but only arbitrarily state your negative opinion of the burros' effect on these. You fail to credit the burros for their many positive contributions to the desert ecosystem, such as their seeding of native desert plants and the building of soils through their feces, their acting as a prey species to feed mountain lions and scavengers, and their wide distribution of grazing due to their nomadic habit. You also fail to recognize the fact that the burro's return to the wild in the S.W. North America constitutes a restoration of the equine component of the ecosystem here, as attests abundant fossil evidence proving the existence of an ass-like equids similar to the burro not so many thousands of years ago in this region (rf: MacFadden, Bruce J. 1992. Fossil Horses: Systematics, Paleobiology, and Evolution of the Family Equidae. Cambridge Press).

I detect a real negative and bias tone in your consideration of the wild burro in your EA and gather plan -- a negative predisposition toward the burros. It's as though you've found your target and now are proceeding to fire away at it! Just a look at the relative proportions of herbivore species on these vast desert areas reveals how you are singling the burros out in a discriminatory manner for blame. You would do much better to focus your attention on modern man's devastating impact, both direct and indirect, upon this fragile desert ecosystem, such as by air and water pollution, mining, off-road vehicles, poaching, overgrazing of domestic livestock (which the wild burros and horses are not), elimination of natural predators to favor livestock and game animals, etc., than to persist in scapegoating such an admirable desert survivor returning to the land of its ancient and recent ancestors and a species that has contributed so much to the worldly advancement of our presently ungrateful kind!

Happy New Year for you and the wild burros, I hope!

Sincerely,

Craig C. Downer, Mammalian Ecologist
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