

Department of the Interior
Bureau of Land Management
California State Director Mike Pool
2800 Cottage Way, Suite W-1834
Sacramento, CA 95825-1886

June 16, 2007

RE: Clark Mountain Burros/Decision May 31, 2007

Dear Director Pool:

I am writing to protest the BLMs recent decision dated May 31, 2007, to exclude relative and pertinent information submitted for BLMs consideration regarding cumulative management actions and decisions that have decimated the wild burro populations and habitat within the state of California.

While BLMs authorization to implement "management actions" that result in the eradication of the historic Clark Mountain burros causing irreparable harm to the public and the Nations resources within the sole context of this site specific decision, when viewed in *relation* to the wide body of information presented in the report, "Wild Burros of the American West", that the Clark Mountain burros are *one of the last wild burro herds remaining under BLMs jurisdiction from a previously historic thriving population within California*, the impact of the cumulative damage and irreparable harm is beyond dispute.

By failing to include this valuable perspective and overview in context with the recent authorization to eradicate one of the last remaining wild burro herds within the state, the BLM is attempting to circumvent assessing the cumulative damage of their management actions and thereby allowing distorted analysis and justification of their decisions, not only to expatriate the Clark Mountain burros, but those that have resulted in decimation of entire wild burro populations and habitat of California.

Furthermore, the BLM is charged with managing "multiple resources" on public lands to maintain a "thriving ecological balance".

As the report "Wild Burros of the American West" so clearly illustrates, this "balance" has been so skewed in favor of every other species and multiple use objective within California (such as the California bighorn population, a "sensitive species" now outnumbering California's BLM approved wild burro "appropriate management level" by a ratio of 10 to 1), that the BLMs failure to comply with laws and mandates to maintain a "thriving ecological balance" becomes glaringly apparent.

The BLM is required to base its management actions and decision *in relation and context* to multiple resource issues on public lands. This mandate and policy is affirmed in CFR 4700.0-6 (b) that requires wild horses and burros to be considered comparable with other resource values in the formulation of land use plans, several sections within the FLMPA that affirms and preserves the rights of wild horses and burro under the 1971 Wild Free-Roaming Horse and Burro Act in *balance with other resources*, as well as the "Act" itself, whose *intent* was to provide for their *preservation within that balance*.

Additionally, the impetus for the evaluation done in the "Wild Burros of the American West" of the current status of remaining wild free-roaming burros within California and our Nation was a direct result of the BLM California Needles Field Offices assertion that, ***"Removal of a small population of burros from a small herd management area would not significantly affect the larger landscape of the American West or the maintenance and management of populations of wild horses and burros symbolic of the historic American West."***

Through this assertion, the Needles management team attempts to utilize a *relation value* of wild burros in context with a National perspective to justify conclusions that are not supported by the actual evidence and analysis either in a state or National framework.

The BLM is applying double standards that allow the agency to address "selective multiple issues" if it suits their "desired outcome" while refusing to address pertinent information that addresses these same "multiple issues" necessary for proper analysis and objective conclusions.

While I applaud the decision by BLM to review the information submitted on a National scale for the continued preservation of our wild free-roaming burros throughout the West, this National analysis should not circumvent the necessary consideration of the information presented *in relation to the cumulative impacts of BLMs decisions to wild burros within the state of California or to the Clark Mountain burros themselves*.

Therefore, I strongly urge you to reconsider your decision to omit this information in addressing BLMs administrations, management actions and decisions that have authorized the irreparable harm and inevitable expatriation of wild free-roaming burros in the state of California as well as the centuries old historic and genetically unique Clark Mountain wild free-roaming burros.

Sincerely,



Cc: Sterling White-Field Manager, BLM Needles Field Office
Tom Pogacnik-California Wild Horse and Burro Lead
Dean Bolstad-National Wild Horse and Burro Operations Lead