

SMC Public Input 12/06
Craig Downers Comments and Input

December 3rd, 2006

Karla D. Norris, Assistant Field Manager: Recreation and Renewable Resources
Bureau of Land Management, Las Vegas Field Office
4701 N. Torrey Pines Drive, Las Vegas, NV 89130-2301
Re: Spring Mountains Herd Management Complex Preliminary Population Management Plan and
Environmental Assessment (EA) NV-052-2007-50 & 4700 (NV052)

Dear Ms. Norris:

I am taking this opportunity to strongly protest your announced Proposed Action: Alternative A: Remove Excess Animals (Mid-High Point AML); Apply one-year Fertility Control with Subsequent Treatments... This constitutes an abrogation of your responsibility to defend the wild horses' and burros' place in the wild in their legal herd areas! By cutting them down to these extremely low population levels and then injecting the mares with a birth control agent, you are setting these animals up for a serious decline. Your betrayal of the wild equids is obvious from the outset. Your arbitrary proclamations concerning "excess" and "overpopulation" are not substantiated but merely represent your own convenient justification for the wild equids practical elimination within their own legal herd areas. By so betraying the wild horses and burros in the wild you are also betraying the public who appreciate these animals in the wild. If I were to qualify your treatment of them, it would be one of "extreme prejudice" and contrary to the true spirit and intent of the Wild Free-Roaming Horse and Burro Act, P.L. 92-195. Please redo this assessment to provide for fairer numbers within the vast legal herd areas (yet still only a minor proportion of the public lands) that are established under the Act. To do otherwise, to proceed with your proposed action is the epitome of arrogance and unfairness!

The following are my comments with reference to page number:

Cover Letter: Additional issues: Viable populations preserve regional adaptations among the wild horses and burros, but your cutting the populations down to such an outrageously low level thwarts many years of adaptation of these animals to the special ecological conditions found in the Spring Mountain Complex! Additional alternatives: I suggest the use of natural barriers and where necessary artificial barriers around the perimeters in order to keep the wild horses from clashing with civilization. I strongly encourage you to greatly reduce and where possible eliminate livestock within the legal herd area of the wild horses and burros, that these national heritage and returned native species and genus may be truly treated as the principals in the land of their ancestors as mandated by the law!

Page 2: 1st Paragraph: Your calling the wild horses and burros overpopulated is a prejudiced and arbitrary judgement! 2nd Para: You are wrong here! Significant detrimental impact will result to the wild horses and burros!

Table 1: I note the very large acreages within the HMA's and WHT's. It is plain the wild horses are not getting their due share of resources and consideration here where by law they should!

Next to last para: Physical boundaries separating Red Rock HMA/WHT should work well to implement self-stabilizing herds, thus obviating the cruel helicopter roundups and displacement of wild equids for many years to come. Last para: Burros should be regarded as a Restored Native Genus and wild horses should be considered a Restored Native Species. There is abundant evidence to support this. See Forstén, Ann. 1992. Mitochondrial-DNA time-table and the evolution of Equus: comparison of molecular and paleontological evidence. Ann. Zoo. Fennici 28:301-309; also: Kirkpatrick, J.F., Ph.D., & Fazio, P.M., Ph.D., 2005. Wild Horses as Native North American Wildlife. Stmt for the 109th Congress (1st Session) in support of HR 297.

Page 4: 1st Para: 147 wh's and 146 b's are much too low population levels for long-term population viability. This is ludicrous and a shameless mockery of the Act, especially for such a large area with legal status for preserving the equids in their free roaming and naturally integrating state! 2nd Para: Unfair: People should fence their property off from burros and governments should employ Streiter-Lite Reflectors to prevent wild horses and burros and many other species of wild animals such as deer and skunks from coming onto roads at night! (Refer to www.strieter-lite.com and Julie/Lauren Keller, Streiter

Representatives at 775-241-7138, keller4sl@msn.com 3rd Para: Wild equid populations should be allowed to stabilize within the herd area complex through the judicious use of natural and, where necessary, artificial barriers so as to retain/attain as near a complete habitat for viable equid populations. 4th para: This is a bias interpretation, skewed to justify the removal of wild horses! 5th para: This is an arbitrary and capricious judgement, very unfair to wh/b's! Last para: Your merely stating this does not convince me! Your statements about 'thriving natural ecological balance' sound so rosy but this is really a grossly unfair and unsubstantiated judgement. You seem to be heaping all the blame on the poor wild horses and burros while ignoring the real culprit: reckless humanity with its blind and ecologically destructive traditions such as imposing too many livestock upon the public lands, or promoting almost exclusively game animals such as deer on the public lands!

Page 5: 1st para: NDOW (Nevada Dept. of Wildlife) is a deadly enemy of wh/b's and has always been! Don't expect any caring or fair judgements here as concerns wild equids in the wild! They are full of "extreme prejudice" and for decades they have targeted the wild equids for elimination any way they can. Such is a major reason for the Wild Horse Act in the first place: to defend against such wild horse enemies as these! They always are blind to positive statements concerning the wild equids, ignore their evolutionary roots in N.Am. and positive ecological contributions, and, in general, go out of their way to denigrate them! ... I opposed fertility control with PZP as this is setting the wh/b pop's up for decline. This works against the herds' natural vitality! 2nd para: The general plan you present fails to allow for monitoring of the resource to accommodate greater equine populations when resources are more abundant. It also fails to recognize the Relative Proportions of livestock and big game in herd areas vis a vis wh/b's. This is a gross oversight! 3rd para: You are employing arbitrary and circular reasoning here as in many other places. All your document is tendentious, i.e. tending to incriminate and thus to eliminate the wh/b's from their rightful and legal wilderness homes and ancient land of their ancestors! 4th para: Your sense of "balance" is a mockery, for you employ a double standard. In other words, your "balance" always works against the wild horses/burros and for the other species, even in their legal herd areas. This constitutes an abrogation of your responsibility toward them! You shamelessly overlook many of the positive contributions of wild horses/burros to the ecosystem (see my enclosed article: Wild and Free-Roaming Horses and Burros of North America: Factual and Sensitive Statement - How They Help the Ecosystem). 5th para: wh/b's should be considered as wildlife. There is generally an overemphasis on livestock and game species on the public lands to the exclusion of wh/b's – even within that minor portion of the public lands that constitute their legal herd areas!

Page 6: Top: The actual welfare of the wh/b's themselves, esp. in the wild, is given very short shrift by you! 1st para: Concerning 'self-sustaining': Both self-sustaining and stable populations of wild horses and burros in the wild could be attained given the proper allocation of resources and design of herd areas. These would necessarily have to be quite large areas and ones where the natural forces and principles are given free reign and allowed to act over time. This "in field" management is one that has not been tried by BLM or USFS, which instead directly guts the herds periodically, thus stimulating their recompensory higher rates of population increase. This then becomes a self-serving/perpetrating institution for large budgets through Congress from the U.S. taxpayer. Many enrich themselves, as usual at the equids' expense! All this must change. This approach is wrong-headed and contrary to the true spirit/intent of the Wild Horse Act!

Bottom: This Draconian attitude allows no chance for the defenders of wild horses and burros in the wild, since roundups merely proceed forthwith and any legal complaint is thus rendered mute.

4th para: Your failure to detail other grazing pressures in the area, especially livestock and big game animals sticks out like a sore thumb! To reveal these usually proves how unfair and negative is the attitude of our supposedly public servants toward the wh/b's and their supporters!

Page 7: Top para: point 4: Indeed, you would be setting the wh/b's up for inbreeding by reducing them to such small, token population levels! 2nd para: Issues Not Addressed in EA: You fail to address the issue of the Relative Proportions of livestock and big game in their resource utilization (AUM's) in relation to the wild horses and burros. This should be made clear, but is not, for obvious reasons! Niche separation between wild equids and other species is also ignored, as are mutualistic aspects of the relationship there between! You also fail to mention the very large negative impact on many Las Vegas and others who like to observe, photograph and in general be with the wild equids in the wild within their legal herd areas here in the Spring Mtn. Complex. I myself have observed this herd here in Nevada's magical southern deserts where the wild equids lend a special aesthetic touch. If your plan goes through, this recreational opportunity will be largely eliminated! ... Concerning re-allocation of forage and water, I see you are

stonewalling against this very rational suggestion. In fact you should be fighting for the greater water rights of the wh/b's, as you have the legal leverage to do so. What you lack is the caring and, hence, the will! Re: suggestion to extend current HMA/WHT to original HA boundaries: Again you are being very unfair toward the wh/b's and their supporters. These equids should be reinstated in their full original ha's or substitute areas equal in size and appropriate for wh/b's should be given for the wild equid herds. ... Next to last para: Your statement about the "principally" stipulation of the Wild Horse Act is way off base! You are clearly in denial of your legal obligation in adopting this legally incorrect and bias approach. Wild horse and burro herds clearly should be managed "principally" for – who else? – the wild horse and burros in the wild, yet you are allowing all the opposite to occur! This is a deliberate subverting of the true intent and spirit of the Act by BLM/USFS, a twisting of the law to favor the traditional vested interest enemies of the wild horses and burros in the wild, such as the Nevada Dept. of Wildlife and ranchers against whom the Act was designed to defend!

Page 8: 1st para: I note that a vacillation in acreages and population numbers can be skewed over the years to eliminate wild horses and burros from their – and our wild equid appreciators' – legal herd areas. This has happened in state after state and is well documented (See my enclosure).

2nd para: You should be working toward an in-field management strategy that would obviate these cruel roundups and adoptions! Many formerly wild horses/burros soon end up being slaughtered. They should be allowed to stabilize their population numbers within their holistically, or ecologically complete, habitat in balance with all the other species. This is where they evolved; and they can do this as a true "climax" species (member of the climax series of ecological succession) if we people would only allow them to do so, i.e. give them their deserved space and freedom on these least productive regions of the United States.

Bottom: I favor Alternative D: No Action. You should design an in-field plan to accommodate truly long-term viable populations of wild horses and burros along the lines just described.

Page 9: Top: There is often a failure to provide a veterinarian on site, as I have witnessed during other roundups. The captured wild horses are frightened out of their wits and many are coughing, lungs choked with dust, or have sprains or pulled muscles or even broken bones, after the helicopter roundups. Many die from shock after these roundups. This happens in the holding corrals, or those of the adopters, but is unreported, of course. I have witnessed this. – There is a better way to allow the horses and burros to stabilize within their legal herd areas, to stabilize around bigger population numbers that are truly viable and within large but still contained ecosystems containing all the components for long term viable populations. – This is my dream! As close to the realization of true freedom on Earth as is now possible for these noble animals, who have sacrificed so much for the benefit of mankind, but whose true place on this Earth is IN FREEDOM by grace of God! Here I quote you a verse that is engraved on my belt buckle depicting the horses: "With nostrils flared and mane flying, the horse is an image of beauty and grace with an undying spirit. Although [only briefly] domesticated by man, its heart is its own, forever wild and free!".

Bottom: I vigorously protest this very unfair decision to gather 95% of the current estimated wild horses and burro population within the Spring Mountain Complex, i.e. 344 horses and 660 burros in January, 2007! This will leave non-viable populations of 104 horses and 120 burros. The Spring Mountain Complex totals 771,625 legal hma/wht acres. This is an enormous area capable of supporting at least a few thousand wild equids. Your allowing to remain only 224 would result in 3,445 legal acres per wild equid! This comparison on its face proves your gross unfairness! Your proposed action is a shameless abandonment of your obligation as representatives of the federal government both toward the wild equids and toward the very large public who support them in their wild home. You must not overlook this interest group and only cater to the wild horses' enemies, the vested livestock and big game interests who are blinded by their vested interests in exploiting the public lands resource and unwilling to share what is not exclusively theirs in the first place. Is this true multiple use, I ask you?! Your proposed 95% removal will gut the wild equid populations and set way back the horses' and burros's process of self-stabilization in this special desert region and their special adaptation to this ecosystem!

Page 10: Top: No where in this document do you mention how many livestock and big game animals there are in terms of relative resource consumption within the legal herd area of the wild horses and burros! This is a gross oversight, as is your failure to mention by what percentage the herd management areas (BLM) and wild horse territories (USFS) have already been reduced from the original herd areas, or areas occupied during the passage of the Act in 1971! Your trend toward wild horse and burro elimination from their rightful legal areas sticks out like a sore thumb!

Bottom: Alternative D: No Action: I favor this. Wild horse and burro populations should be allowed to

stabilize at truly viable population levels within their own legal herd areas and should be reinstated therein. Natural and artificial barriers should be used to allow this stabilization to occur over time. The wild horses would then become ecologically well integrated according to their pre-determined niche, one fashioned over the millions of years of their ancestral presence and co-evolution with the other native North American species here. This is an awesome process and one that must not be ignored or treated as of no consequence! – This reintegration of the wild equids, returning to their true home in freedom and with all the diverse elements and species in the natural world, is possible for these “climax” species, but this is not being allowed by BLM/USFS, the two appointed guardians of wild equids in the wild under the law, because of their lack of appreciation and caring for these animals in their natural, free-living state! Page 11: Top: You do not discuss the adverse effects the PZP fertility drug on the survivability of the wild horse and burro populations, nor on the quality of life experienced by the individual equids – and this is considerable! Mid page: You have not proven that wild horses and burros cause deterioration of the range! You only arbitrarily state this and we are left to assume all is justified! Yet knowing your bias against wild horses and burros, I highly suspect that you are heaping blame on the wild horses and burros and over magnifying their affect on the ecosystem, since you have already proven that you view this effect in a negative way! AML, as here defined, fails to take into account the wh/b’s own inherent welfare! Bottom: Helicopter roundups cause much trauma, suffering and death to gathered wild horses and burros, as is revealed when the lives of each individual formerly wild equid is traced out over time – so often, Alas!, to their bitter end, that is indeed a merciful release or liberation from this cruel world.

Final Statement: To me what you are contemplating doing to this small wild horse and burro population is unconscionable! There is no worse attitude and act in the world today, for it represents a betrayal by mankind of horse kind, an abysmal lack of basic respect for these beautiful, free-spirited animals and their freedom and right to share planet Earth as home even in a relatively minor portion of some of its least agriculturally productive regions. Is there no limit to man’s possessive greed and arrogance?! Surely the horse and burro deserve to live as the Act intended, in their natural freedom in these designated legal herd areas, places where they return to living as God intended and not as greedy man, who regards them as a mere appendage of his own worldly entrapped ego! – God surely must love horses and burros living in their natural freedom upon the land and especially here in North America, for he has allowed them to do so a whole lot longer, in fact many millions of years and thousands of times longer than this upstart humanity has presented itself upon this planetary and continental scene!!!
Sincerely yours,

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