August 18, 2017

BLM Elko District Office  
3900 Idaho Street  
Elko, NV 89801  
Attn.: Mark Jackson, Wells Field Manager  
Email: [blm\_nv\_eldowellshorsegathers@blm.gov](mailto:blm_nv_eldowellshorsegathers@blm.gov)

Re: Public comment on Environmental Assessment (EA) for the Antelope Complex & Triple B Complex, DOI-BLM-NV-E030-2017-0010  
(Comments due by 4:30 PM Pacific Daylight Time on Aug. 21, 2017.)

Dear Sir/Mame:  
Thank you for providing me with this EA for review. I am submitting the following comments including protest of your Proposed Alternative A and ask that you give these points your careful consideration and respond to me on these points at your earliest convenience.

Overall, I believe your proposal represents an abandonment of your legal duty to protect and preserve the wild horses as truly vigorous, long-term viable, and ecologically well adapted populations in the wild in their several Herd Management Areas (HMAs) of the Antelope and Triple B Complexes of HMAs. My chief reasons are as follows:

1. You have failed to present a reasonable choice of alternative proposals for the protection, preservation, and management of these wild horse herds. For this reason, I would favor the No Action Alternative. Though I have earlier presented to you a Reserve Design alternative that would do justice to these unique and valuable wild horse populations, the merits of this Reserve Design strategy were not seriously recognized in your EA. For this and other reasons, I request a full Environmental Impact Study be conducted, chiefly because of the major detrimental impact that your proposed action would have on these wild horses themselves, both individually and as concerns their social units, both harem-type bands and the closely interbreeding collection of bands known as herds, or populations.
2. Your proposal to reduce the HMA herds to the low end of their Appropriate Management Levels (AMLs) is grossly unjust. I have visited all of these herds and their HMAs and would be personally and professionally harmed if you proceed with the proposed draconian wild horse reductions. The unfairness of your proposal is revealed by the following breakdown of the numbers:   
     
   The Antelope Complex consists of the following HMAs by name: Antelope, Antelope Valley, Goshute, and Spruce-Pequop, all of which I have visited over a period of many years. The total legal areas for these wild horse herds are ca. 1,324,745 acres and the AML for the entire complex is 155 low range to 259 high range. But if you reduce the interbreeding herd of this comple to the low range of 155, there will be only one remaining wild horse for every 8,547 acres. This is a ridiculously unfair allocation of space and habitat for the wild horses here that will cause a serious setback in the social stability of the various bands and the entire herd – a stability which itself is a natural and benign way of limiting horse populations and can be combined with other elements of Reserve Design to achieve population self-stabilizing (see my Reserve Design proposal attached with this letter). Even at the high range of the AML: 259 horses, there would be 5,115 acres per individual wild horse. This would also be a grossly unjust provision for the wild horses, whose Carrying Capacity in Great Basin habitats such as these is in the order of one horse per 100 acres – and this is being quite conservative!

For March 1, 2017, BLM employees estimated the wild horse population of the Antelope Complex to be at 1,320, not including young of the year, or foals born in 2017. This figure translates into 1,004 acres per presently surviving individual wild horse. This is not an overpopulation of wild horses but rather an under-population within the Antelope Complex, given the carrying Capacity (K) of this ecosystem for the horse species, conservatively set at 100 acres per wild horse.   
I also remind you that under Section 2 c of the Wild Free-Roaming Horses and Burros Act (WFHBA), a wild horse or wild burro legal area is defined as “the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros … and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands.” From the above figures, it is clear that the proposed action and allowed population levels, space, and resource allocation are in serious violation of a core mandate of the WFHBA! I notice how assiduously the composers of the EA have avoided full disclosure as concerns the relative proportioning of resources, including both forage and water. In other words, the allocations to livestock, mining, and other exploitive interests vis-à-vis the wild horses themselves is grossly unfair – even within their legal areas!  
 I am also personally familiar with the Triple B Complex of HMAs, and have visited each of its HMAs over a period spanning many years and dating from the 1980s. This complex consists of the Triple B HMA, Maverick-Medicine HMA, and Cherry Springs Wild Horse Territory (USFS). Together these three legal wild horse areas contain ca. 1,682,998 acres. Given a combined AML for the Triple B Complex of 472 low range to 889 high range, at the low range level to which the proposed Alternative A would reduce this herd, there would be 3,566 acres per remaining wild horse, which is again a very unjust and unfair allocation of legal habitat space for the wild horses of the Triple B Complex. Even at the upper range of the AML of 889 horses, there would be 1,893 acres per individual wild horse, which is only one-nineteenth the carrying capacity for wild horses here in this Great Basin habitat. Again, as with the Antelope Complex, it is clear that the wild horses of the Triple B Complex are not overpopulated from any truly objective perspective, but rather are under-populated and are being set up for failure, due to inadequate resources and allowed population sizes within their very own legal areas.   
 The current population of the Triple B Complex is 3,201 wild horses, not including 2017 foals a large percentage of which normally die anyway. This figure reveals there are 526 legal acres per individual wild horse – only one-fifth the carrying capacity population level for this their legal area!  
 Combining both the Antelope and the Triple B Complexes reveals a total of 3,007,743 acres (compared to the total Project Area of 3,870,919 acres). Given a combined AML for both Complexes of 899 low range to 1,678 high range, the low range 899 level – to which BLM proposes to reduce these herds – would leave only one individual wild horse per 3,346 acres, while the high range level of 1,678 wild horses – at which point BLM would again declare an “overpopulation” and round them up again – would leave only one individual wild horse per 1,792 acres. Both of these figures reveal the egregious extent to which the BLM would betray its legal duty to these wild horses – representing a “national heritage species” protected by law and possessing rights on their legally designated Herd Area/HMAs on BLM and Territories on USFS lands. For this reason and as a professional wildlife ecologist concerned with the future of the returned-North-American-native wild horses on their legal lands, I call for a cancellation of the proposed Alternative A and for a full EIS on these complexes and all planned future provision for their wild horses. The latter must be much more just to and grant them their legal rights here, not make a mockery of the WFHBA!

1. In the EA’s Introduction, I take issue with the statement that “the BLM Wells Field Office has determined that even though there has been an above-average amount of precipitation [this past] winter and spring, there are still no known water sources in the area for wild horses to obtain water late in the spring and summer”. Having visited this area, I perceive this as a bogus justification for the wild horses’ over-reduction, one designed to further the near monopoly of resources, including both forage and water, by public lands ranchers as well as mining and energy companies operating in the area. There exist plentiful water sources for the wild horses in the Antelope Complex, which I have personally visited, but it’s up to our public officials/servants to secure adequate water and other habitat requirements for these protected and valued animals, not abandon their duty toward them in this regard. (See photos attached.)  
    During my participation in the National Wild Horse and Burro Advisory Board field trip on September 7, 2016, I recall our BLM-guided tour of the Dolly Varden Spring and surrounding area including meadows on the eastern side of the Antelope Valley HMA that was being used by wild horses in the morning, then our group being taken in the afternoon to the northwestern portion of the Antelope Valley HMA. Around the Dolly Varden spring and meadow and on this eastern side of the Antelope Valley HMA, we observed apparent heavy forage usage and generally dry conditions, but were not informed of the history of gross livestock overgrazing in this same area. We inspected the northwestern portion of the HMA in the afternoon. Here much less wild horse presence was observed, but greatly increased usage by livestock was apparent. When I questioned a BLM official and rancher as to why this was the case, they merely shrugged and told me that the wild horses for some strange reason were not coming over here to the northwestern portion of their HMA. I found this hard to believe, particularly given my knowledge of the semi-nomadic nature of wild horses, of how they naturally move on and rest-rotate their areas of grazing and foraging.   
    When I spied a few distant bands in the late afternoon of the day of the tour (after which the rest of the tour returned to Elko), I received some insight as to why this could be the case. These wild horses were extremely afraid of people; and as I approached them, first by vehicle and then on foot, the band stallions immediately signaled to their respective bands to retreat upslope into the more steep and rocky, tree-covered portions of their respective home ranges. Judging from recent as well as long-standing reports of illegal wild horse killings happening in this region of public lands, I concluded that locals were very probably harassing, capturing, and even killing the wild horses here and that this was causing them to stay away from the more productive forage and water in this northwestern portion of the Antelope Valley HMA. I can similarly testify, factually and with documentation, to similar examples of persecution of wild horses within their legal HAs/HMAs on BLM and Territories on USFS lands where the wild horses have legal rights to live and should be given a viable amount of forage, water, shelter, mineral sources, space, and special areas for their safe reproduction (all factors recognized in this EA, with the exception perhaps of mineral sources). Unfortunately our public officials too often betray the wild horses – as well as burros – in regard to their full habitat requirements for long-term viability, survivability and sound ecological adaptation, which is a process requiring patience, not the rush-rush mentality of modern civilization!   
    The Triple B HMA was particularly grievous in this regard, and I over-flew this area as well as other nearby HMAs and my findings were written up in official reports that were presented to the BLM offices in Ely and Wells in 2010-2012, much of whose summers I spent in the Complexes making observations.
2. I strongly object to the hasty dismissal by BLM officials of inputs contained in Sections 2.6.5, 2.6.6, 2.6.7, 2.6.8, and 2.6.9. These recommendations deal with the very crux of the unfairness issue at hand. Particularly in 2.6.5 where it is brought up that the wild horses’ legal areas are to be “managed principally” for their herds under 43 C.F.R. 4710.3 and nearby codes, I believe the BLM preparers of the EA are quite remiss in their official duty. And the same applies to 2.6.6 recommending a raising of AMLs for wild horses in their HMAs and to 2.6.7 recommending the removal or reduction of livestock. These three suggestions are logically what must happen if the current gross injustice toward the wild horses is to be remedied. To also dismiss the ability of nature to control the population number of wild horses, as presented in 2.6.8, “flies in the face” of the true and core intent of the WFHBA. This concerns the right of these wild horses “to achieve and maintain a thriving natural ecological balance on the public lands” and “at the minimum feasible level” of management, or interference with their natural lifestyle from people including the two federal agencies charged with their protection and preservation “in the wild” upon their rightful national public lands (see Section 3 a of the WFHBA). I also take this opportunity to remind all of us that the WFHBA clearly states that wild horses and wild burros “contribute to the diversity of life forms in the nation and enrich the lives of the American people … shall be protected from capture, brandings, harassment or death … are to be considered in the area where presently found [1971 as year-round habitat area] as an integral part of the natural system of public lands”.   
    I also remind both officials and concerned citizens that Section 6 of the WFHBA authorizes cooperative agreements with landowners and state and local governments to better accomplish the goals of the WFHBA, such as providing complete and unimpeded habitats for long-term- viable wild horse and wild burro populations. Similarly I remind that Section 4 of the WFHBA not only allows public officials to remove wild horses and burros who stray onto private property, but also allows private landowners to maintain wild free-roaming horses and burros upon their private lands or on lands leased from the government. This is an excellent opportunity for the public to provide more complete and viable habitat for truly long-term-viable wild horse and burro herds and to complement the BLM and USFS legal wild equid areas in this respect.
3. Concerning Section 3.2.12 on page 117 of the EA, the proposed Alternative A presents a significant impact upon the wild horse populations of the Triple B and Antelope Complexes themselves as it undermines their long-term well-being, vitality, and genetic viability. Thus, under NEPA, an EIS should be required; and I ask for this unless BLM willingly modifies its proposal to allow for greater numbers and more adequate habitat and resources for the wild horses here.
4. On page 2 of the EA, I question the meaning BLM adopts for Thriving Natural Ecological Balance (TNEC) as mandated by the WFHBA in its Section 3A. From the evidence, BLM is distorting the true significance of this phrase to insert mainly unnatural rather than truly natural components into what should be a much more “hands off” situation concerning the wild horses and their habitat.
5. On page 3 and throughout the EA, I question the assertion that the wild horse population grows at 20% or higher annually and will always do so regardless of its circumstances. In fact, very high mortality rates of newborn foals usually occurs, even up to 50% or more, and there also occurs relatively high mortality rates among adults that are typically 5% or more. Additionally, BLM should not overlook the increasing mortality or other types of removal rates of wild horses and burros from the public lands that are occurring today. This is due to increased lawlessness on our public lands and is a very serious threat to our remaining wild horses and burros. I have received much testimony as well as observed first-hand evidence of this. BLM officials should be transparent on this issue, for in reducing the herds to grossly underpopulated levels, they are setting them up, not only for genetic inbreeding and ecological un-fulfillment in what should be a thriving biodiversely enhanced, wild-horse/burro-containing ecosystem, but also for their very sudden disappearances altogether. Also, I must add that such substandard, low population levels render the wild horse/burro populations much more vulnerable to disease, Global Climate Change/Warming with its attendant increasingly erratic storms and droughts, along with a host of other natural and human-caused factors.   
    Much of the above-described, unfair treatment of wild horses boils down to the fact that BLM officials both regard and portray this, in fact, returned-North-American-native species as non-native destructive exotics/invaders in America rather than the balance-restoring and ecologically benign and life-enhancing presences they actually are! I believe so much of this negative attitude is owing to the past history of our country and dominant society’s persecution of Native Americans and “put down” of so many species associated with pre-Columbian America, including the buffalo, the wolf, the grizzly bear, the puma, the prairie dog, and whatever other species were conveniently branded as undesirable pests in spite of their great antiquity and major contribution to the life community here!
6. Concerning the WRMPWHA requirement, stated several places throughout the EA, that pre-livestock release levels of winter forage be limited to 10% usage in winter-use areas, I very much object to this devastating requirement being placed upon the wild horses within their legal areas! The BLM never should have agreed to this, as, as its own admission would seem to imply, such a requirement produces a devastating blow to the wild horses’ true viability and filling of their ecological niche here in their legal areas (true intent of the WFHBA). That BLM officials merely acquiesce to this outrageous demand proves their abandonment of duty toward the wild horse and their well-being in order to favor livestock interests primarily, even within the legal areas of the wild horses. I strenuously object to and protest this and request that BLM find a much fairer stipulation here! By its own admission, BLM acknowledges in the EA that the *no-greater-than-10%-winter-forage-usage-pre-livestock-release* places a severe constraint on the wild horses here in their legal areas – areas which are supposed to be “devoted principally” to the wild horses’ welfare, not that of the public lands ranchers! To wit: on page 5 of the EA: WRMPWHA states that “the availability of forage for winter usage is considered the most limiting factor for wild horses.”
7. From page 6 of the EA, by its own admission, the BLM has not yet received the statistical analysis of the 2017 wild horse survey of the Antelope Complex concerning the foals born and their survival/mortality rates. I therefor strongly object to BLM proceeding to include the 2017 “foal crop”. This ignores natural and human-caused mortality of foals that is often very high, even to 50% or more.
8. Again regarding issues raised on page 6, I very much object to BLM’s failing to recognize the negative impact that fences and other artificial barriers within the wild horses’ legal area are having upon their ability to obtain sufficient forage, water, shelter, minerals, space, and reproductive habitat requirements. Fences are major excluders of wild horses in these HMAs; and to ignore their negative impacts on the wild horses constitutes a dereliction of duty toward them and the U.S. public who support them. I observed many grazing allotment separation and other types of fences in the HMAs in question and observe that they are having serious harmful effect upon the wild horses in these two complexes.
9. On pages 11-17, as elsewhere throughout the EA, BLM plans for the use of fertility controls of various methods including the use of PZP, GonaCon, Gelding of stallions, and 60%-

Male-to-40%-female sex ratio skewing. I very much object to and protest these highly invasive and disruptive assaults upon the integrity of these unique wild horses! These methods are contrary to the core intent of the WFHBA that mandates letting the wild horses/burros be themselves, wild and free, upon the relatively natural public lands and specifically prohibits their domestication or semi-domestication. What BLM is here proposing clearly violates WFHBA! Need I remind BLM that Section 3 a of the WFHBA clearly states that management of the wild equids is to be done “at the minimum feasible level” and that they are to be allowed to become an “integral part of the natural system of public lands”. To me personally and as a wildlife ecologist, this signifies their being allowed to fill their natural ecological place/role/niche on the public lands and that Natural Selection, not humans’ artificial selection, should be allowed to operate. In the Reserve Design strategy for wild horse/burro protection, preservation, and management, the true mandate of the WFHBA is upheld.   
 The harmful effects of PZP have been convincingly proven (See attached article with sources). These ill effects pertain both to PZP-darted mares and the wild equid social units, both bands and herds. PZP administration also leads to weakened immune systems among surviving and reproducing wild equids and sets them up for decline and eventual demise!  
 In regard to the use of GonaCon, this EA clearly states that its effects are experimental and that the wild horses being administered this pesticide would be monitored to see what ensues. I have heard and read about serious ill-effects of GonaCon and again very much object to its usage on the wild horses here.   
  
 This EA similarly state that the short- and long-term effects of gelding of stallions would be monitored. I strenuously object to the gelding of the wild stallions -- many of whom would be the band leaders, or “patrons” that are so important to the protection and education of the wild horses! First off this is very painful and often lethal and would place the geldings at great jeopardy in terms of their survival in the wild. Geldings often find themselves ostracized by intact stallions and even mares, kicked, bitten and otherwise abused, beaten, cast off, or even killed! This is clearly not right! I also strongly remind you that male genetic diversity/heterogeneity is dangerously low among horses worldwide, including wild horses, and that your further compromising this would put the entire populations of wild horses at serious risk as far as their long-term survival is concerned. Again, this is yet another example of the human domestication of the horses and this works very much against Natural Selection and the horses’ short- and especially long-term vigor, viability, and survival upon this beautiful planet Earth that we share as home and place of unfoldment with them and so many other worthy species.

Final Words:

Consider all that *horsekind* has done for *humankind*! Now, isn’t it high time that we people do something truly decent and good for horses?! And what better way of paying our debt of gratitude than simply allowing them a just portion of this world wherein to be themselves, to live in their age-old, wonderfully evolving, unfolding manner – in short, to live and to be truly free to fulfill themselves in the sight of God and His plan for all beings?! This, to me, was and remains the true and core purpose of the WFHBA. This true intent was and remains a sacred one that we humans abandon only at our severe peril.

Wild horses both can and will self-stabilize when allowed to fill their proper ecological niche, play their legitimate role within the ecosystem and within the ecological process of ongoing life. If they were the destructive misfits that their enemies like to portray them as, they would surely not have lasted all the millions of years they have upon this venerable, ancient, yet ever renewing and young Earth.

Also remember that the horses as well as the burros are post-gastric digesters and that they restore soils and successfully disperse the intact seed of many plant species for germination. Remember too that they greatly help by preventing catastrophic wildfires – something very much needed in this era of Global Climate Change, or Warming.

They are also quite beautiful in their own special way … ancient and very wise and sensitive presences who deserve to live freely and to carry on, one with the entire life community on Earth where they belong and to share in the common destiny – which is a good one for all concerned! It is perverse o ignore wild horses’ value here and their claim to worthiness, to freedom, to suitable Earth home, or viable habitat, wherein to realize themselves! But to generously honor these horses and their rightful land and natural freedom constitutes a great virtue, indeed, and would be a great leap forward for all humanity.

Sincerely,

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Enclosures

Cc: various interested parties.