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Re: Barren Valley Complex Wild Horse Population Management Plan, Draft E.A. Public Comment due Monday May 18, 2020 by 4 PM Mountain Daylight Time. Email comment permitted, or post marked.

Link for document at <https://www.blm.gov/news/oregon-washington>

Document #: DOI-BLM-ORWA-V000-2019-0040-EA

Dear Public Official:

Spring Greetings & hope you are keeping safe & well! I am familiar with the HMA herds in question and have visited & photographed these attractive & vital mustangs on several occasions going back many years. I have some stunning photos of some near Burn's Junction. I have just finished reviewing your E.A. & proposed plan for the vast Barren Valley Complex consisting of 3 HMAs whose mustangs, you claim, intermingle making them one interbreeding population. I will consider these one by one:

1. Sheepshead/Heath Creek HMA possesses 204,500 acres, or 320 sq. mi., & has an assigned Appropriate Management Level (AML) of 161 to 302 for a mean of 232 horses. This is equivalent to 881 acres, or 1.38 sq. mi., per individual wild horse at the mean. This would be a nearly wild-horse-empty Herd Management Area & would make a mockery of the Wild Free-Roaming Horses & Burros Act. Yet the other two HMA's are even more unjust.
2. Sand Springs HMA has 192,524 acres, or 301 sq. mi., with an assigned AML of 100 to 200 for a mean of 150 mustangs. At the mean there would be 1,283 acres, or 2 sq. mi., per individual horse. But the last HMA is even more extreme in its treatment of the wild horses.
3. Coyote Lake/Alvord-Tule Springs HMA has an enormous 559,400 acres, or 874 sq. mi., but the AML assignment is only 198 low to 390 high for a mean of 294 wild horses in this vast area. At the mean, there would be 1,903 acres, or 2.97 sq. mi., per individual wild horse. This would be a preposterously low wild horse population for such a vast & appropriate legal habitat for the wild horses according to honest readings of the WFHBA & other acts including NEPA, Multiple Use, FLPMA, PRIA, the National Historical Preservation Act & even the Endangered Species Act, for this unique herd could possible qualify as a threatened population, especially at the low number to which you are attempting to reduce the horses.

By following through with your proposed reduction to low-end AML for the Barren Valley Complex, which would be 459 horses in 956,424 acres, or 1,494 sq. mi., you would be leaving only one individual wild horse per 2,084 acres, or 3.26 sq. mi. Ironically this would be to render "barren" of its principal legal presences (the wild horses) the "Barren Valley" wild horse complex – especially when you add to it your proposal to further inflict these horses, who by law are supposed to be naturally living & minimally interfered with, by employing PZP, GonaCon & possible surgical forms of fertility control as well as age & sex skewing from the natural. This would be to semi-domesticate these animals & would violate the core intent of the WFHBA & several other laws (see above mentioned).

From your E.A., I gather you will allow 3,322 cow-calf pairs, or 6,644 head of cattle, to forage within these same three legal wild horse areas. (And cattle are being bred or altered for increased size these days, making

this even more unfair!) Given that the whole complex's AML of 459 low to 895 high, at the mean of 677 wild horses, there would be 9.8 – nearly 10 times as many cattle grazing in this enormous complex as there are wild horses! And thought I realize there are seasons of use for the livestock, still this proportion is more probably very much in the ranchers' favor. As one who cares for wild horses in the wild, this proposal is an outrageous violation of the WFHBA & constitutes an extreme favoring of public lands ranchers. I consider it a real "slap in the face" & also that of the General Public & all who honor the natural lives of wild horses, aka mustangs.

The horse species is deeply rooted in North America & should be considered native North American wildlife that restore a missing niche & role within the public lands' ecosystem. Many honest & objective studies have proven that wild horses actually enhance the Great Basin & other ecosystems both in the West & elsewhere. Based on my observations as an ecologist, they certainly play a very important role in the Barren Valley Complex HMAs. For example, it has been abundantly proven that wild horses are major reducers of dry flammable vegetation that becomes tinder for potentially catastrophic wildfires during drier seasons. Whether on public lands or elsewhere, these fires are of major concern today & are increasing due to Global Warming. Therefore, the wild horses would prove themselves of great value by mitigating & even preventing wildfires particularly catastrophic ones. There are conclusive proofs of this that we should heed concerning this truly life-or-death situation we face today whether we like it or not. We should strive to overcome our past biases & "think outside the box" so as to recognize many of the fascinating ways in which wild horses -- when allowed -- harmoniously fill their niche & greatly improve & enhance the Western public lands ecosystem. This would be the true fulfillment of the WFHBA where it plainly states: "contribute to the diversity of life forms within the nation and enrich the lives of the American people ... [and] they are to be considered in the area where presently found [1971 as year-round habitat] as an integral part of the natural system of public lands." This would be to truly achieve a "Thriving Natural Ecological Balance" & "at the minimum feasible level" of interference (Section 3 a). But what you are proposing is quite opposite.

I recommend that you adopt a Reserve Design strategy here & a much more wild-horse-appreciating & -defending policy. Please check out my proposal at [www.gofundme.com/mstngreservedesign](http://www.gofundme.com/mstngreservedesign) for details.

In reviewing your extensive document, I noted too much filtering & misinterpreting of the cited studies & the facts they present in order to suit an anti-wild-horse agenda.

Of those Alternatives presented, I favor the one that argued for reducing livestock in the Complex, because the ranchers are in fact actually monopolizing the resources here & this is against the law. But if allowed so, most will surely take advantage! This situation is not true multiple use. Code of Federal Regulations 4710.5 & .6, aka Closure to Livestock, would justify this. I propose a "Restore Wild Horses Alternative" to bring the horses up to the critically viable population level of at least 2,500 reproducing individuals, the level recommended by the IUCN SSC Equid Specialist Group for genetic viability and ecological adaptability in nature, i.e. "in the wild" (Duncan, P. 1992. Action Plan for Equids).

I believe you should honor & consider it a privilege to defend the rights of the wild horses here in this scenic and wide-open, freedom-inspiring place, which I love to visit & make wild horse & nature observations in. The horses here are sentient presences with deep roots going back thousands even millions of years; they are needed to complement all the ruminant, cloven-hooved herbivores like bison/cattle, sheep, pronghorn & deer, because they contribute more humus to help build soils, disperse more intact seeds & of a greater variety, & perform a number of other ecological services that the cloven-hooved ruminant-digesting herbivores especially domestic cattle & sheep do not to near the same beneficial degree. In this regard, I provide the following references:

[https://www.researchgate.net/publication/239848265\\_Facilitation\\_between\\_Bovids\\_and\\_Equids\\_in\\_an\\_African\\_Savanna](https://www.researchgate.net/publication/239848265_Facilitation_between_Bovids_and_Equids_in_an_African_Savanna) ;

<https://www.researchgate.net/publication/274006946> The Horse and Burro as Positively Contributing Returned Natives in North America  
<https://www.researchgate.net/publication/318163234> Pleistocene megafaunal extinctions and the functional loss of long-distance seed-dispersal services ;  
<https://www.thesprucepets.com/horse-manure-facts-1887394> ;  
<https://www.horsetalk.co.nz/2017/09/25/evolution-wild-horses-cattle-effect-range-damage/> ;  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2781800/> ;  
<https://www.researchgate.net/publication/223007520> Horse dung germinable seed content in relation to plant species abundance diet composition and seed characteristics ;  
[https://esc.rutgers.edu/fact\\_sheet/horses-and-manure/](https://esc.rutgers.edu/fact_sheet/horses-and-manure/) ;  
<https://www.horsetalk.co.nz/2018/01/08/fire-grazing-wild-horses-better-cattle/> ;  
<https://www.horsetalk.co.nz/2017/11/20/wild-horses-wildfire-wildlife-ecological-imbalance/> ;  
<https://www.myoutdoorbuddy.com/articles/133925/what-is-the-value-of-an-american-wild-horse?.php> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4503665/> ;  
<http://www.pleistocenepark.ru/en/> ; <https://awionline.org/content/wild-horses-native-north-american-wildlife> ; <https://www.livescience.com/9589-surprising-history-america-wild-horses.html> ;  
[http://pennsylvaniaequinecouncil.org/SHCAC\\_green.php](http://pennsylvaniaequinecouncil.org/SHCAC_green.php) ;  
<http://advances.sciencemag.org/content/advances/1/4/e1400103.full.pdf> ;

I further recommend a setting up of Cooperative Agreements with ranchers, hunters, miners, recreationalists, conservationists, local & state governments, as Sections 4 & 6 of the WFHBA allow. The goal would be to permit a greater AML for the wild horses, one much more commensurate to their vast legal habitat where according to Section 2 c of the WFHBA they should receive the principal resources. This would involve BLM officials truly protecting the rights of the wild horses here rather than abandoning them.

Do not hesitate in contacting me concerning this critical ten-year plan. I am concerned that it prove devastating to the wild horses here and to many other associated values and presences, including people like me who love and appreciate these majestic animals and honor their right to live freely and naturally in a natural and extensive habitat that provides for all of their long-term, multi-generational survival needs. The ten-year plan would seem to preclude further input from the public.

I would appreciate your thoughtful response to the points and suggestions I have raised.

Sincerely,

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Cc: Various interested parties.