

May 27, 2014

Cedar City Field Office, Attn: F.O. Mgr.: Elizabeth R. Burghard, 176 E. DL Sargent Drive, Cedar City, UT 84721. Email: [blm ut biblesprings@blm.gov](mailto:blm_ut_biblesprings@blm.gov)

Re: Bible Springs Complex Wild Horse Gather Plan E. A. UT0900447, comments due May 30, 2014

Dear Ms. Burghard and team:

I appreciate this opportunity to give input on your Environmental Assessment on the protection, preservation, and conservation of the wild horse herd of the Bible Springs Complex. This complex consists of four original Herd Areas, namely: Bible Springs, Blaun Wash, Four Mile, and Tilly Creek whose composite size is 222,929 acres. After reading that the Appropriate Management Level for the composite wild horse population, aka herd, has a range of 80 horses (lower end) to 170 horses (upper end), I am immediately struck by the great emptiness in terms of present wild horses in this vast area. Dividing 222,929 by 80 yields 2,787 acres per individual horse, while dividing 222,929 by 170 yields 1,311 acres per individual horse. Both of these figures expose the preposterous treatment that the wild horses are receiving in the Bible Spring Complex and that goes hand-in-hand with the exaggerated forage and resource allocations that are given to the ranchers and their livestock.

Section 2 c of the Wild Free-Roaming Horses and Burros Act (WFHBA) defines a wild horse/burro legal area 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 concept for the public lands.” The resounding point I would like to make is that your provision for the wild horses is grossly unfair and actually illegal, as it disobeys the core intent of the unanimously passed WFHBA of 1971, which will complete its 43<sup>rd</sup> year this coming December.

I am further opposed to your opting for the “quick drug” solution for “controlling” wild horse numbers, and continue to present for your consideration the Reserve Design approach to wild horse protection, preservation, and conservation. This holistic recognition and accommodation of the wild horses is truly consistent with those basic tenets of the WFHBA that mandate, and I quote: “... they 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” [preamble of WFHBA] and so as “to achieve and maintain a thriving natural ecological balance on the public lands “and “at the minimum feasible level” of management (Section 3 a).

Even in desert areas, wild horse density of one horse per one to a few hundred acres of habitat is entirely bearable by the ecosystem and within the carrying capacity provided the horses themselves are not being set up for a very unnatural, horse-empty situation and are allowed their free-roaming lifestyle as is consistent with the true intent of the act. Yet this “setup” is precisely what you propose for them in your E.A! Your plan will result in a greatly thwarted and dysfunctional wild horse herd that comes no way near to filling its natural niche and role in the ecosystem. The horse should be considered a North American native wildlife species and to a greater degree than many other bovid and cervid species due to their much greater length of coevolutionary presence. And they should be recognized for their many positive contributions to the ecosystem as post-gastric, as contrasted to ruminant, digesters. These points I discuss in depth both in my book “The Wild Horse Conspiracy” and in my recent (1/2014) professional article “The horse and burro as positively contributing returned natives in North America” --

both of which describe the components of a successful Reserve Design strategy for long-term viable, ecologically well integrated, mutually benefiting as well as naturally self-stabilizing populations in the wild.

Each region has a unique heritage, and the mustang heritage of the Bible Springs Complex is a great American treasure, with major Spanish colonial mustang admixture. It would be a terrible injustice to set them up for failure and dysfunction by adopting the plan you propose plan in your Environmental Assessment. Please redo this, exercise your right to reduce livestock, and apply your right to secure adequate water as Implied Federal Water Rights that come with the WFHBA (see p. 126 of my book), as well as similarly securing all other viable habitat components for a viable, wild, free-roaming wild horse population.

This is your legal duty, but even more your moral one, and this issue touches the heartstrings of people both in America and throughout the world.

I remain fully willing to work with you to do right by this wonderful and progressive “law of the land,” to do right by all the American public and, most of all, to do right by the magnificent horses, as stated on April 17<sup>th</sup>, 2014 as a guest on the Southern Utah Forum radio program out of Cedar City.

Sincerely,

Craig C. Downer, wildlife ecologist and author

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Cc: Juan Palma, Utah BLM State Director, [jpalma@blm.gov](mailto:jpalma@blm.gov); Elizabeth Burghard, Cedar City BLM F.O. Director, [eburghar@blm.gov](mailto:eburghar@blm.gov)