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USDI BLM Carson City District, Sierra Front Field Office

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Re: DOI-BLM-NV-C020-2013-0017-EA, Pine Nut Health Project

Dear Gentlepersons:

Thank you for this opportunity to give input on the Pine Nut Health Project. I have just read the document and want to commend you on your diligence in assembling this wide-ranging analysis concerning the extensive, bio-diverse, and unique Pine Nut Range of western Nevada. While learning much from this erudite document, upon reflection, I am struck by a certain tendentiousness that selectively filters all that the Pine Nut Range is home to in order to favor the proposal for widespread reduction of the Pinyon-Juniper woodlands. Therefore I am offering the following points that I urge you to reflect upon:

1. In reviewing the livestock grazing allotment for the Pine Nut Range, I gather that during the year, ca. 1,511 cow-calf pairs and 12,707 sheep graze its several allotments at various seasons and that the total, year-round Animal Unit Months (AUMs) allocated for livestock sum to ca. 12,113 AUMs. This is the equivalent of over 1,000 cow-calf pairs grazing all year long in the Pine Nut Range. A review of the livestock seasons-of-use indicate a preponderance of grazing early in the season when forage is highest in nutritional value. This is quite unfair to the year-round wildlife species that are left with what remains of the forage, including those returned North American native species: the wild horses, for which the entire Pine Nut Range is a legal Herd Area (HA), since the wild horses were present throughout the range upon the passage of the WFHBA in 1971 – the requirement for their legal right to this land. In spite of this fact, ca. 60% of the legal HA has been declared “horse free” by BLM using spurious justifications, which I have documented in my recent book on the wild horses and burros (The Wild Horse Conspiracy, available in print or as an eBook; ask me for a copy). Ca. 40% of the remaining original HA constitutes the present Herd Management Area (HMA), where a very low and disproportionate Appropriate Management Level (AML) of only 119 (low) to 179 (high) individual horses are allowed to remain. Since there are nearly 400,000 acres of BLM land in the Pine Nut Range and 40% of this land in the Pine Nut wild horse HMA equates to 160,000 acres, this translates to a very underpopulated wild horse reserve where only one individual wild horse is permitted for every 1,000 HMA acres, or for every 2,500 original 1971 HA acres. To maintain that this is anywhere near a fair treatment of the wild horses and their numerous supporters among the General Public (many local) or to maintain that these horses in following their tendency to fill their natural niche in the Pine Nut Range are somehow “overpopulated” is egregiously false and reveals an extreme prejudice on the part of BLM officials or those who require them to carry out this injustice! However, I am hopeful that with the current reassessment of the Resource Management Plan (RMP) the Carson City BLM is undertaking, this mockery of the unanimously passed Wild Free-Roaming Horses and Burros Act of 1971 will be corrected and the wild horse

population will be allowed to fill their valuable niche throughout the entire Pine Nut Range. This range is a perfect place for these mustangs, and I have been observing them here since I was a boy. The tightly knit bands, or families, naturally spaced themselves throughout this range and found ample forage to establish a truly long-term-viable population that could migrate up to the 9,451-foot-high Mt. Siegel and its surrounding meadows during the warmer seasons while occupying lower mid-elevations and foothills on both the eastern and western sides of the range during the cooler seasons – and should be permitted to do so again! These wonderful returned North American natives truly enhance and restore the ecosystem here, through their feces greatly building the important humus component that lends nutrient-richness, texture, and water retention to soils as well as widely dispersing a great variety of intact seeds for germination. These are post-gastric as opposed to ruminant digesters (nearly all other medium to large herbivores in the West) and as such they fulfill a very important missing role in the ecosystem, complementing a myriad of plant and animal species, including the very ruminant species which wild-horse-detractors claim are damaged by the wild horses. The problem is not with these animals themselves, but with we people when we fail to respect these species and the marvelous way in which they fit together in an ecosystem. – We must allow this fitting to happen.

In general I notice that your EA leaves the wild horses largely out of the picture in its evaluation of the impact of the proposal for Pinyon-Juniper woodland reduction. As just described, you fail to acknowledge the great role the horses play in the building of soils and in the dispersal of intact seeds through their droppings. You also blithely ignore how wild horses greatly reduce dry, flammable vegetation, or how they can restore the vegetation in burned-over areas, such as the enormous 24,140-acre Bison fire of earlier this year (2013). If the wild horse had been in their original legal Herd Area throughout the Pine Nut Range, this fire would not have been nearly as serious or could have been prevented. I am also very displeased with the proportion of forage allocation that the livestock permittees are given, for example: the Buckeye: 131,137 out of 133,865 AUMs (98%), Clifton: 21,891 out of 21,891 (100%), El Dorado (14,310 out of 14,301 (100%). Other forage allocations that are at or near 100% for livestock are Clifton Flat, Fort Churchill, Hackett Canyon, Koch Ditch, Mill Canyon (19,645), Pine Nut (35,033), Rawe Peak (8,288), Red Burbank (3,159), Spring Gulch (57,454), and Sunrise (18,462). This is an egregious violation of the Wild Free-Roaming Horses and Burros Act in its section 2 c where it clearly states that the land where the wild horses and burros occurred in 1971 (meaning year-round habitat) shall be “devoted principally” to their welfare and benefit! I trust that you will bear this in mind in your new RMP. Here in concise form are additional important and interrelated points that I would like you to consider:

2. In general, I think you minimize and in many cases altogether ignore the value of the individual pinyon pines and juniper trees and of the pinyon-juniper woodland community as a whole. Though, toward the end of your assessment you do list several bird species, such as the singular Pinyon Jay, that depend to a large degree on the pinyon nut, you fail to emphasize the great value of the pinyon-juniper forest in its provision of cover, or shelter, to a great many animals, both large and small, as well as nesting habitat. Also you entirely ignore the food value of the juniper berry. As concerns the so-called “encroachment” of the pinyon pines and junipers, this term in itself is designed to cast these beautiful and ecologically beneficial trees in a negative light. Some of the benefits that you fail to mention include: (a) how these magnificent trees

catch and channel precipitation into the earth, thus preventing erosion and thus equitably providing many other plants and animals with a dependable source of water; (b) how their roots reach out to hold or stabilize the soils, particularly important on many of the steep mountain slopes they inhabit; (c) the fact that their geographical spread – particularly true in the case of the more arid-tolerant junipers – can be viewed as a response to the increased air temperatures and water evaporation produced by Global Warming. Here we should ask ourselves the question: if nature favors the juniper and/or the pinyon in certain Western regions, then wouldn't it be wiser to honor this choice by natural selection rather than to fight it? And, furthermore, wouldn't it be wiser to de-emphasize the blind European-imported traditions of livestock production on these public lands whilst adopting the age-old and nature-attuned Native American custom of moderately harvesting the pinyon nut as well as the juniper berry? This can be done in a way that shares the greater portion of these fruits with the native animals by dispersing such harvesting over vast and diversely located groves of the pinyon-juniper community and by setting strictly enforced rules as to the quantity of nuts or berries that can be harvested on any given tree or in any given grove. Relatively speaking, this would produce a much greater quantity of nutritious food than does cattle and sheep production and in a way that is much more harmonious with the native ecosystem as well as much more wholesome for our health. I trust that you will not lightly dismiss this suggestion. Though it may be considered outlandish to some, in fact it is based upon an ancient and long-time-tested native lifestyle and could if earnestly tried, provide a solution to so many ecological problems associated with livestock production on the Western public, as well as private, lands. (d) Pinyon and juniper trees thrive in drier, well-drained soils, so as an ecologist, it is hard for me to believe that they are "encroaching" on riparian habitats along streams or lakes. There must be some other factor involved here, such as livestock – particularly cattle camping on these riparian habitats and ruining their absorptive soils, causing bank cutting and drainage of stream- and spring-side meadows, etc. I have personally observed a lot of this both in the Pine Nuts and in many other livestock-occupied places throughout the West! Such conditions create the drier soils that pinyons and junipers can thrive in, but we should not assign causation of such to these trees. (e) Thick stands of pinyon and/or juniper can and do naturally thin themselves by virtue of natural processes that take place over time. The resultant dead trees can, through the process of decay, build soils and bolster the food chain, e.g. wood-eating beetles eaten by small rodents and birds eaten by their predator weasels and bobcats, etc. Perhaps this natural process would be much less disruptive to the ecosystem as a whole. In other words, give nature a chance and learn to live in harmony with the age-old natural processes. In this regard, have not many of the recent fires in the Pine Nuts already created an opening of many of the extensive Pinyon-Juniper woodlands? (f) The tall pinyon and juniper trees transpire and create a temperature-moderating humidity that favors many symbiotic plant and animal species. Also, they stave off violent and soil-drying winds and prevent wind erosion to a large degree. Their height extends the sheltered living community further above the ground than do low lying shrubs and grasses, and this can be viewed as a very positive and life-enhancing contribution. As a diverse wildlife including returned native wild horse advocate, I certainly appreciate the important comfort and shelter they provide these animals, both during the hot and cold seasons of the year. They also serve as rubbing and marking posts for many species, including the horses, bears, deer, pronghorn, and puma. – There are many other benefits of the pinyon-juniper forests both to

the natural community and to we people who should learn to live as a harmonious part of the natural community. With these few examples, I mean to convey the general drift of the reforms I politely ask you to consider. Now to follow to my remaining points.

3. The Pine Nut Range has experienced some pretty severe fires, the most extensive of which, the Bison fire (24,140 acres) just occurred earlier this year (2013). Many of the pinyon and juniper trees have already been killed or naturally thinned by these fires, and the Pine Nut ecosystem now finds itself undergoing a critical stage of recovery. It therefore seems that nature has already performed what you are now intending to do by artificial means. It could be that your major pinyon and juniper reduction program will, in fact, produce an overkill of the Pine Nut Range's pinyon and juniper woodlands, one that will accelerate a general decline in this particular ecosystem precisely because it is unnatural and in conflict with nature's overriding laws, many of which we are unaware because of their more subtle and intricate qualities. In this same regard, there have been extensive "chaining" projects and woodcutting areas in the Pine Nut Range. These have already eliminated many pinyon-juniper woodlands, such as on the northeastern side of the range where the Sunrise Pass road takes off to the west.
4. On page 6 of your document under 2.0 Alternatives & 2.1.1.1 Implementation Prioritization, there is no mention of the wild horse population and its value to the ecosystem, nor is there any mention of your coordination with any wild horse supporting groups – and there are many of these both locally in and round the Pine Nuts and nationally that would jump at the opportunity to work out naturally beneficial "win-win" solutions to so-called "problems" nearly all of which, in my considerable experience, are human-caused rather than caused by the plants or animals themselves. Under Sections 4 and 6 of the Wild Free-Roaming Horses and Burros Act, cooperative agreements are encouraged to further the mandate of this noble and sharing act, which was and remains to secure the natural habitats for "thriving, naturally integrated" populations of wild horses and burros – and this means long-term viable, naturally self-stabilizing populations that are allowed both the habitat space and the generational time to harmoniously adapt to and co-evolve with each special ecosystem, or life community, where they find themselves, for whatever intricately historical or evolutionary reasons. I recommend you read my Reserve Design proposal to learn how we can allow for truly viable yet naturally self-stabilizing wild horse populations. I can send you this proposal and you can also read about it in Ch. IV of my book.
5. While I laud your efforts to protect and restore the threatened Sage Grouse, you should beware of becoming too narrowly focused upon just one species. This can lead to a neglect of other important species, some of which may actually be a lot more threatened with extinction than this species, for example some of the plant species you list as sensitive, etc., in the E.A.
6. Though your E.A. portrays the pinyon-juniper woodland as expanding at an unusual rate, you should consider that in many areas and especially true in the Pine Nut Range and other ranges around the historic Comstock mining district, large areas were denuded of their pinyon and juniper trees in order to stoke the ore smelters to extract silver, gold and other metals beginning in the late 1800s. This historic plunder is notorious to many ecologists who realize that your so-called "encroachment" of the pinyons and junipers is in fact a restoration in many of these areas where old-growth pinyon-juniper forests existed not long ago. This is proven by historical pictures and is beyond question in many areas in and surrounding the Pine Nut Range, among

many similar examples (see Trimble, Stephen. 1989. The Sagebrush Ocean. Univ. of Nevada Press. Page 156).

7. Finally, I caution against any skewed interpretation of ecological facts and observations that overly perpetuate the status quo of the public lands livestock ranchers, whether here in the Pine Nut Range or anywhere in the West. And the same goes for the public lands hunting establishment, whether for big or smaller game species. Too often these aggressive segments of our society seek to dictate public lands policy while the greater public and the greater ecological community are incorrectly de-prioritized. And the same can be said too of certain mining or energy extraction industries on the public lands. In this regard, the Sunrise Mine in the southwestern portion of the Pine Nut Range is a listed Superfund site because of the uncontrolled chemical contamination it caused in earlier decades. Anaconda on the eastern side of the Pine Nuts is another enormous, indeed, monstrous, example – and this is to mention but a few. ... My point being that it is now time for bold action to provide truly wise and caring solutions to the ecological predicament in which we – and all of life – find ourselves today. We must accept our responsibility there and we must dare to think outside of the box of narrow-minded, blindly accepted, though currently prevailing, traditions, customs, and habits. -- Yes, positive and major change is possible! In fact, without such, there can be no true solution to the critical challenges that mankind and all kinds, or species, and their communities urgently face today. So let us step up to the plate. Let us put our very best foot forward, for our failure to do so now and at this critical time will only result in a tragedy whose full horror – the extinction of life on Earth – we must refuse to accept.

Sincerely Yours,

Craig C. Downer, wildlife ecologist

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