

ASSESSMENT OF JUSTICE ISSUE FOR AMERICA'S WILD HORSES & BURROS in 23 Original &/or Reduced Legal Areas on BLM & USFS lands in Arizona, California, Nevada & Oregon 2016 – 2019.



Handsome wild horse band, Nevada's Pine Nut Mountain wild horse HMA by Craig C. Downer, 4/2014.

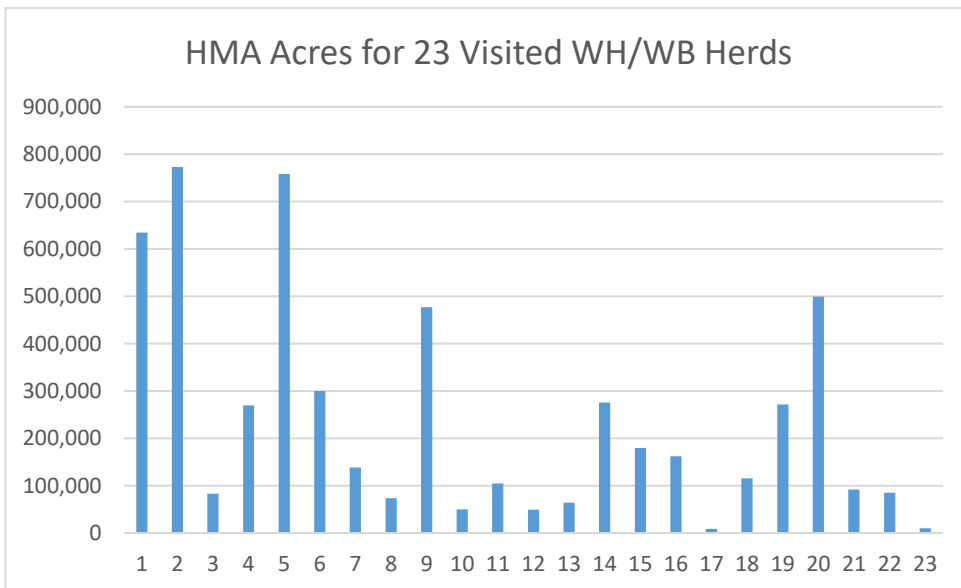
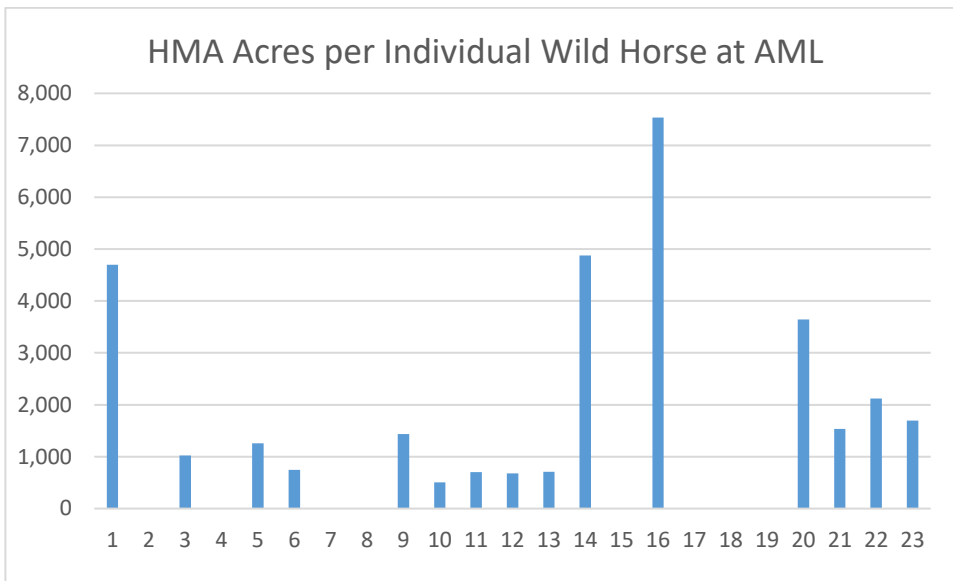
Figures taken from BLM/USFS Land Statistics 2018 & earlier (see Excel spreadsheet). See also detailed report of visits to Herd Management Areas/Herd Areas/Territories including ecological transect results.

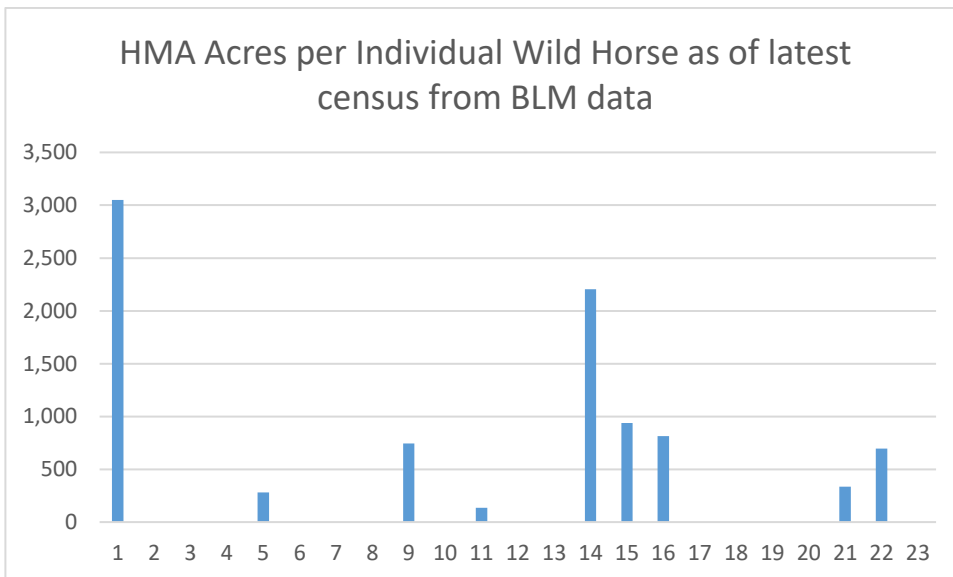
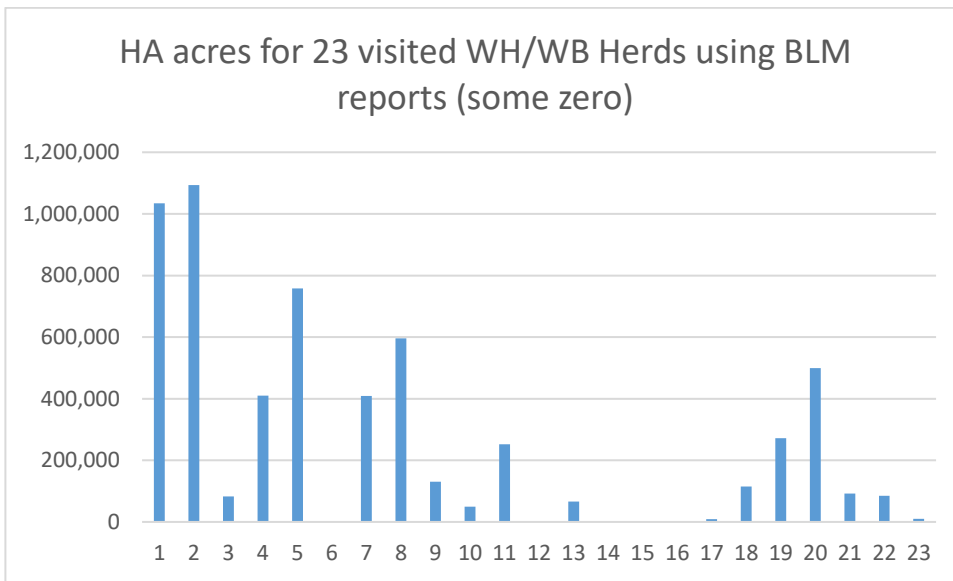
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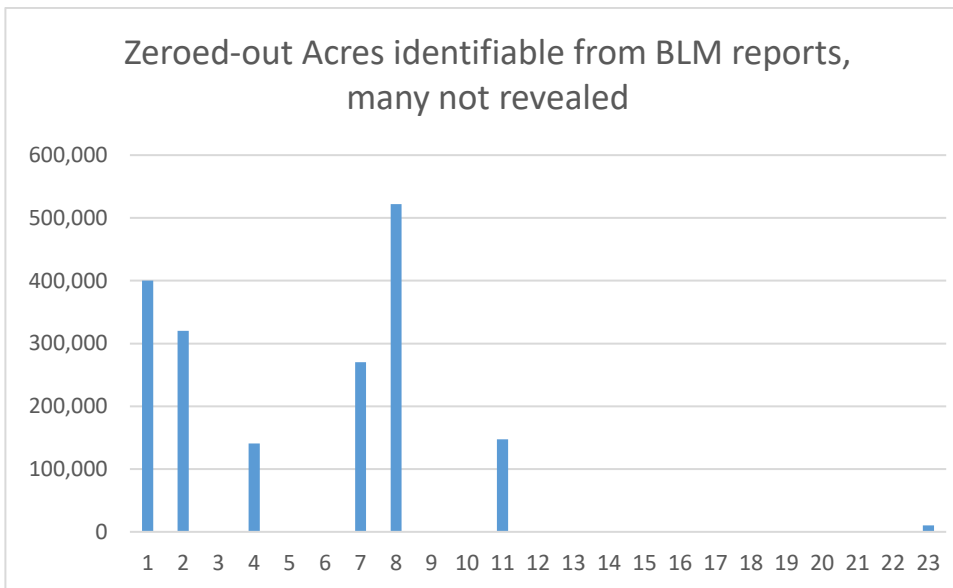
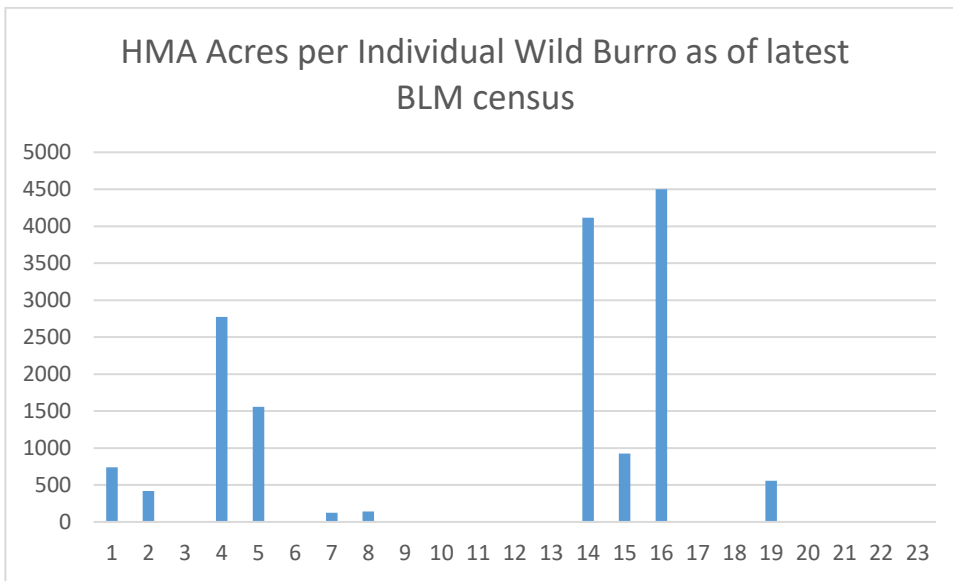
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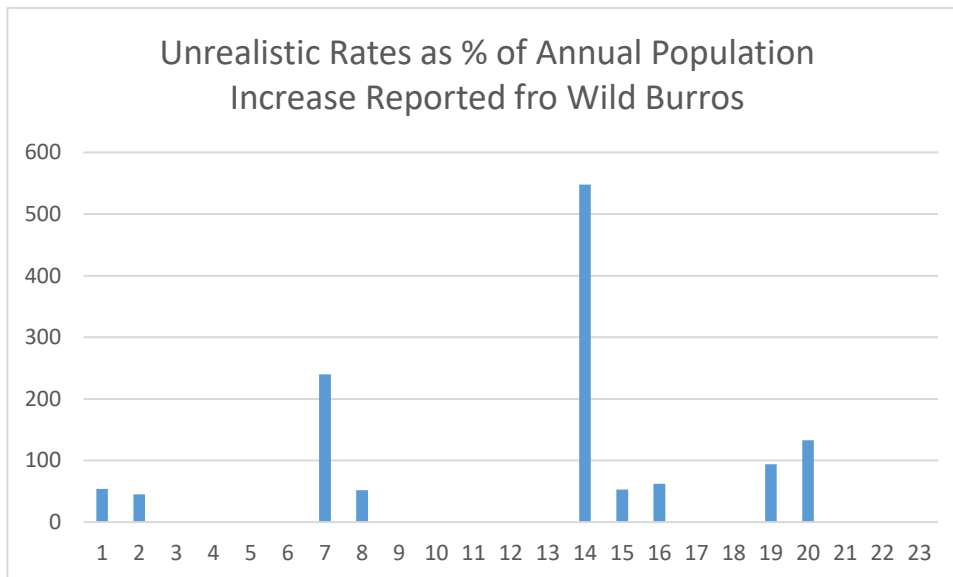
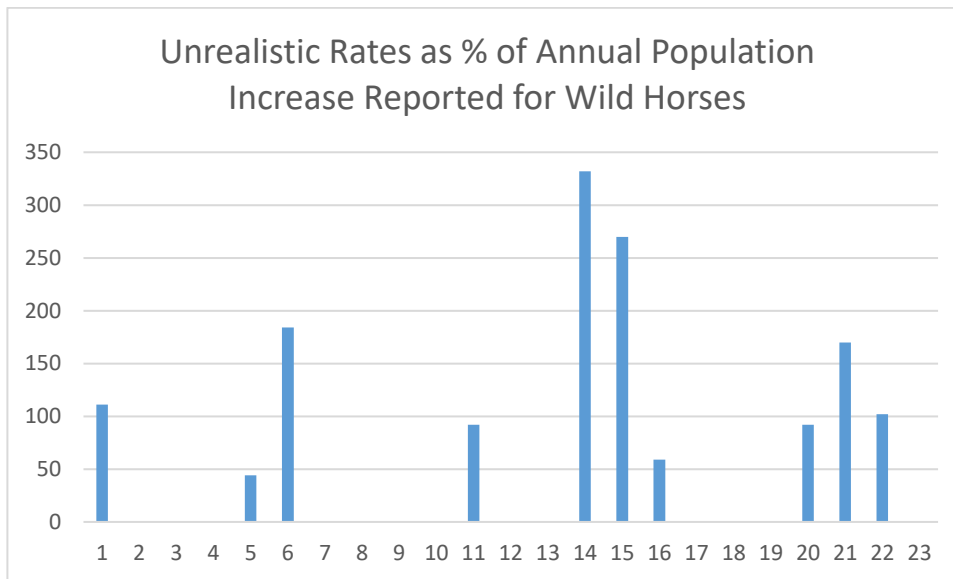
WFHBA = Wild Free-Roaming Horses & Burros Act of 1971; AML = Appropriate Management Level (assigned wild horse/burro population in a legal area); HMA = Herd Management Area (BLM); HA = Herd Area (original legal BLM area); JMA = Joint Management Area (between BLM & USFS); WHT = Wild Horse Territory (original legal USFS area); WH = Wild Horse; WB = Wild Burro; BLM = Bureau of Land Management; USFS = U.S. Forest Service; D.O. = District Office; AUM = Animal Unit Month equivalent to a cow-calf pair/5 sheep/1 horse foraging for one month.

Graphs illustrating unjust official assigned acreages/unrealistic reports by BLM/USFS from their published reports in 23 wild horse &/or wild burro herds & legal areas visited by author (corresponding to order in Excel table).









ARIZONA

CIBOLA-TRIGO WH & WB HMA AZ0011 (BLM YUMA D.O.) #1 in graphs:

In this vast & sprawling area that has largely been given over to the U.S. Army as the Yuma Military Proving Grounds, the original HA is 1,034,422 acres from which 400,204 acres have been zeroed out leaving 634,218 acres in the HMA. Yet, the BLM has assigned a very unjust AML for WH ranging between a low of 120 to a high of 150 for a Mean of 135 WH while for WB the situation is only slightly less unjust & the AML ranges from a low of 228 to a high of 285 giving a Mean of 257 WB. At mean AML, this works out to 4,698 HMA-acres per individual WH and to 2,468 HMA-acres per individual WB. As of the last reported census in 2014, BLM reported 208 WH & 861 WB. This works out to 3,049 HMA-acres per individual WH & 737 HMA-acres per individual WB. All these figures indicate just how wild-horse- & wild-burro-empty this legal area is – and the figure for WHs is more outrageous than for WBs, of whom I observed a considerable number during my visit to the HMA in April of 2018. It would be deceptive for Yuma BLM to claim these animals are overpopulated.

To merely state they are “overpopulated” because they exceed their unfair assigned AMLs is no claim to authority on the subject! The respective natural niches of the WHs & WBs in these areas are determined by factors such as forage availability & productivity, soil quality, water availability, shelter, mineral sources, seasonal migratory habitat, etc. Even in this dry & arid Sonoran Desert, the niche spaces for these wild equids is far from being filled and the hilly & mountainous terrain increases survival resources & niche space. Furthermore, both horse & burro contribute positively to their ecosystems by enriching soils & dispersing intact seeds from a wide variety of plant species. Thus, they enhance the ecosystem, giving it a greater species number, or biodiversity, & as a consequence, a greater resilience to surmount the environmental vicissitudes & changing factors affecting survival & ecosystem stability, one of the chief of which concerns Global Climate Change/Warming. Also it should be recognized that the wild horses & burros can greatly mitigate & often entirely prevent catastrophic wildfires such as those that are breaking out throughout much of the West, as elsewhere, & with increasing frequency & intensity.

At Cibola-Trigo HMA’s mean AML of 135 WHs, there would be 7,662 original HA-acres per individual WH; while at the mean AML of 257 WBs, there would be 4,025 original HA-acres per individual WB! This is a practically wild-horse- & wild-burro-empty ecosystem & hardly the fulfillment of the unanimously passed WFHBA that is still the law of the land & that states in its Section 2 c that the original wild horse & wild burro legal areas are to be “devoted principally but not exclusively to their welfare ...” This law represents a significant General Public & Quality of Life issue, but it is being shamelessly treated, because its basic tenets are being ignored or even mocked by those in charge!

Before proceeding to the next HMA, I call your attention to two unrealistic annual rates of population increase reported by the BLM. These very possibly indicate a “convenient” inflation of population figures to suit those political agendas that continue to target the wild horses & burros for unjust discrediting & consequent reduction or even elimination. The first concerns Cibola-Trigo wild horses which in 2007 the BLM reported at only 135 while in 2008 reported as numbering 285. This represents an 111% increase in one year. On the face of it, this would seem absurd, barring migration into the area, deliberate releases or similar happenings. The second example concerns the Cibola-Trigo wild burros which the 2016 census reported as numbering 487, while the 2017 census reported at 750. This represents a 54% annual increase. Again, this is biologically unreasonable. Both the horse & the burro have long gestation periods: 11-months for the horse & 12 months for the burro. And only with rare exceptions they produce single young. Also the female is at least a few years old before reproducing. And typically there is a two year lag between ensuing reproduction by the female. Additionally, other critical factors influence realized population increase like typical foal mortality of 50% or more. Also, typical adult mortality is usually around 10%; & we should recognize how the mature social structure of both horses & burros reduces reproductive rates by suppressing mating by younger members of the equid society. This latter point relates to the destabilizing effect that drastic herd reductions have on remaining populations. These roundups, usually conducted by helicopter & very traumatizing to the horses and burros, throw the social units into disarray & result in faster rates of reproduction. This frenzied mating expresses the desperation experienced by the wild horses & burros that is brought on by the roundups themselves, the separation of family, or band, members especially true in the case of horses & the breaking up of jack-controlled territories in the case of burros.

In upshot, the egregiously low AMLs (see above graphs) coupled with lopsided resource allocations favoring livestock, big game hunter, mining & energy extraction, etc., in the very legal areas where the wild horses & burros are supposed to be treated as the principal presences, are creating misery &

death for the wild horses & burros, who were meant to live harmoniously within their adequate habitats & in natural, unfenced freedom & with minimum interference (see Section 3 a of the WFHBA). The Wild Free-Roaming Horses & Burros Act should have been a “giant leap forward for America as well as Mankind” but it is being dealt a deadly blow by the very enemies of the wild horses & burros that it was meant to defend against! But it is Springtime, and the good news is that this egregious injustice can be rectified by us humans’ “coming clean” & taking real & concrete steps to share the land & freedom with these highly evolved companions on our shared home: Precious Planet Earth!

Urgently required today is the implementation of a Reserve Design strategy for restoring America’s wild horse & wild burro herds and their respective habitats at long-term viable levels & completeness. This I explain in my proposed & ongoing project, which can be examined on my Go Fund Me link: www.gofundme.com/mstngreservedesign or further examined in depth in my professional article whose link is: www.article.sciencepublishinggroup.com/pdf/10.11648.j.ajls.20140201.12.pdf. This article, entitled “The horse and burro as positively contributing returned natives to North America” gives a much fuller background concerning the naturally living horses & burros & their habitats & the vital roles they play therein than is to be met with in many shallow & meanly motivated publications, government planning documents, etc., that are too often governed by petty mindedness & greed rather than greater honesty & justice.

There are many important facts & observations concerning the Cibola-Trigo wild horses & wild burros & and their legal habitats in this part of the dry Sonoran desert that is bordered on the west by the Colorado River & includes the awesome Trigo & other mountain ranges. This is a unique & special ecosystem; & I urge you to get out there & make your own observations. For these herds need people who appreciate them to take an interest in them, otherwise they will continue to fall victim to those who neither appreciate nor care for them or their future, nor for the realization of the WFHBA’s true & noble intent. Many of the same points I just made for Cibola-Trigo apply to the following 22 equid herds & legal habitats. Each herd-habitat is special in its own way, but needs a caring public to take an active interest in it, to directly get to know it, & to defend & restore its integrity. The following summarizes pertinent facts, figures, etc., for the other 22 herds that I visited during the past few years, adding what I considered of special note but to gain a fuller comprehension of these I urge you to examine the above graphs bearing in mind the reference number for each herd & HMA & also to peruse my fuller report: Observations & Ecological Evaluations ... that greatly complements the document you are now reading & present some more detailed & insightful field observations & ecological transect results based upon my personal visits to these special equid herds & their habitats.

BLACK MOUNTAIN WB HMA AZ0003 (KINGMAN AZ BLM) #2 in graphs:

HA: 1,093,128 acres. HMA: 773,136 acres. 319,992 acres zeroed out. AML: Low 382 to High 478, for Mean of 430 WB. 1,798 HMA acres per individual WB at Mean. Last census 2014: 1,849 WB, for 418 acres per individual WB. Unrealistic increase reported by BLM: 2014: 1,000 WB to 2015: 1,450 WB for a 45% annual population increase. Additional Note: 591 original HA acres per individual wild burro, 2014. Yet, PZP being darted into the jennies of these underpopulated burros, for which there is little monitoring of the short- or long-term effects upon the burros & their ability to survive & adapt.

CERBAT MOUNTAIN WH HMA AZ0002 (KINGMAN AZ BLM) #3 in graphs:

Original HA: 83,006 acres, same as HMA, no reduction. AML: Low: 72 to High 90, for Mean of 81 WHs. 1,025 acres per individual WH at Mean AML. Last Census 2000: 92 WH for 902 HMA acres per individual WH. Wild horses here appear to be fenced out of the western side of their HMA at Cerbat

Mountain ridge. WHs being denied water & forage by fences, capped springs, pipelines, etc. These relatively pure Spanish Mustangs deserve greater numbers for long-term-viability along with a greater long-term-viable habitat. This herd is reported to be self-stabilizing, but persecution, illegal capture & killing is very possible going on. The Spanish Mustang heritage represented here also warrants protection by the National Historical Preservation Act.

HAVASU WB HMA AZ0010 (HAVASU AZ BLM) #4 in graphs:

Original HA: 409,901 acres. Reduced HMA: 269,168 acres. 140,733 HA acres zeroed out. AML: Low 133 to High 166, for Mean of 149 WBs, corresponding to 1,806 acres per individual WB. Last Census 2017: 97 WBs, corresponding to 2,775 acres per individual WB. Both the AML & the existing herd #s are non-viable, genetically & in many other ways. Possible illegal capturing, removal, & killings, yet WBs here are a big tourist attraction.

CALIFORNIA

TWIN PEAKS WH & WB HMA CAD242 (SUSANVILLE CA BLM) #5 in graphs:

Original HA: 758,128 acres, same as HMA. AML: WH: Low 448 to High 758 for Mean of 603 WHs; WB: Low 72 to High 116 for Mean of 94 WBs. Therefore there are 1,257 HA & HMA acres per individual WH at Mean AML & 8,065 HA & HMA acres per individual WB at mean AML. Last Census 2017: 2,693 WH & 487 WB corresponding to 282 acres/WH & 1,557 acres/WB. Suspect overestimation of population. Suspect increases in reported population for WH between: (1) 2013 with 1,020 WH & 2014 with 1,432 WH for 40% increase; (2) 2008 with 1,122 WH & 2009 with 1,599 WH for 43% increase; (3) 2007 with 779 WH & 2008 with 1,122 WH for 44% increase. Important note: There was a catastrophic wildfire named Bush Mountain Fire in 2012 that was most probably associated with large reduction in WH & WB herd by helicopter roundup in 2010. Burned 315,000 acres. Area still recovering. Much livestock trespass observed in Twin Peaks HMA, about which BLM does very little, especially domestic sheep.

DEVIL'S GARDEN WH TERRITORY (MODOC NATIONAL FOREST, ALTURAS, CA) # 6 in graphs:

Original WHT estimate: 300,000 acres. AML: Low 206 to High 402, for Mean of 304 WHs. Mean corresponds to 987 acres per individual WH. Unrealistic population increases reported between 2015 with 38 WH & 2016 with 108 WH, for a 184% annual increase. Recent helicopter roundup in Fall 2018 of ca. 1,000 WHs. Cattle given great majority of forage resource contrary to WFHBA. AWHC released report exposing collusion between Modoc NF & local Modoc County livestock interests (3/8/2019) in order to accommodate monopolization of resource in Devil's Garden WH Territory where ca. 3,000 cow-calf pairs & ca. 2,900 sheep are permitted to forage. Local livestock & big game interests dictating content of Environmental Assessment for WH Management Plan in Devil's Garden WHT. Some local agricultural interests egging for sending gathered horses to slaughter. This is an example of Government Agency Capture by those interests it should be regulating. The State of California has recently passed a law prohibiting horse slaughter, whether wild or domestic, & should be urged to protect the rights of these special & popular wild horses.

PALM CANYON WH HMA CA662 (PALM SPRINGS CA BLM) # 23 in graphs:

HA: 10,170 acres, same as HMA. AML: 6 WH, corresponds to 1,695 acres per individual WH. In recent published descriptions on its webpage, BLM merely described these horses as coming from "historical ranching stock," without mentioning that this signifies a Spanish Mustang Heritage, which is corroborated by their smaller size: 13 to 14 hands & 800 to 900 lbs., & colors: browns & bays. Note: in 4/2016 I gave a WH & WB talk in Palm Springs. Afterward I went to Palm Springs BLM office to ask

where I could view wild horses. The officials referred me to the Palm Canyon WH HMA nearest their office where they said there was an existing herd in the San Jacinto Mountains. When I went there I discovered from members of the Agua Caliente Band of the Cahuilla Native America tribe that all of the wild horses, numbering about a dozen, had been rounded up & removed ca. a decade ago then taken to a ranch near Barstow CA. I was additionally told by tribal members that certain of their tribe cherished these horses, including a tribal elder who had written a book about her people & that included glowing praise for these beautiful wild mustangs & their special contribution to the ethos of the Palm Canyon life community. This area sports tall palm trees in thick groves around delightful oasis springs & offers fascinating desert trails. So not all of these Native American's were in on this betrayal of "brother & sister horse," just mainly some top managers who were probably pressured by prejudiced anti-wild horse factions! Apparently, the BLM didn't even know about this, at least the officials with whom I spoke. I consider this a gross neglect of duty & consider this to be a grossly ignored & sabotaged herd which should be restored! It has now (2019) been removed from BLM's website!

CHEMEHUEVI WB HMA CAD698 (PALM SPRINGS CA BLM) #7 in graphs:

Original HA: 408,645 acres. Reduced HMA: 138,333 acres. Therefore, 270,312 HA acres zeroed out. AML: Low 97 to High 108, for Mean of 103 WBs, which corresponds to 1,350 acres per individual WB. Unrealistic population increase reported by BLM: from 2014 with 218 WB to 2015 with 742 WB, for a 240% annual population increase. Latest Census in 2015 gave 1,115 WBs for 124 acres per individual WB. Reports of frequent illegal capture & transport of these WBs to Mexico, as well as killings, etc.

CHOCOLATE-MULE WB HMA CAD671 (PALM SPRINGS CA BLM) # 8 in graphs:

Orig. HA: 595,429 acres. Reduced HMA: 73,422 acres. Outrageous elimination of 522,007 acres from original legal WB HA! This includes a recent major reduction of HMA acreage from 203,539 to 73,422 acres, indicating the persistent, hostile attitude found in BLM toward protecting wild burros & their legal habitat & survival resources. Note: Some wild horses reported here said to stem from those originally here in 1971 &, consequently, legal. They should be recognized & protected! An unrealistic WB population increase occurred between 2017 with 345 WB & 2018 with 523 WB for a 52% jump.

NEVADA

PILOT MOUNTAIN WH HMA DERIVED FROM NV0315 & NV0690 (CARSON CITY NV BLM) #9 in graphs:

HMA: 477,133 acres. HA acres given as 130,499 acres, reason unclear. Possibly reporting only one of original 2 HAs. AML: Low 249 to High 415 for Mean of 332 WHs which corresponds to 1,437 acres per individual WH. Latest 2017 Census: 642 WHs corresponds to 743 HMA acres per individual WH – which is NOT an overpopulation! See my "Observations ..." portion of this report for my account of field trip to this HMA in Fall 2018, revealing no WHs over much of HMA & abusive cattle trampling & grazing & the consequent ongoing ruination of two vital springs within the HMA! The major concentration of WHs was observed at the southern end of Walker Lake. HMA acres were 3.66 times greater than the given HA acres & this was not adequately explained. Situation bears investigation. One of main cattle permittees was very arrogant & overbearing, even threatening during the field trip.

HORSE MOUNTAIN WH HMA NV0308 (CARSON CITY NV BLM) #10 in graphs:

HA: 49,779 acres, same as HMA. AML: 78 to 118 WHs for Mean of 98 WHs corresponds to 508 acres per individual WH. Herd eliminated with BLM excuse given of "no water due to adjacent landowner/farmer shutting off water where they drank." But now another adjacent landowner (Illia family) offers to restore the herd & allow it to water at its abundant & pure-water springs. I put in a formal proposal to the Carson City BLM Resource Management Plan in recent years in order to set up a cooperative

agreement so as to repopulation the HMA, but so far BLM refuses to honor the WHs' legal right to live here. In so doing, these officials disrespect the general public's interest in this herd, its ecotourism potential, & WHs' important service in mitigating or even preventing wildfires. Ask me for details.

PINE NUT MOUNTAIN WH HMA NV0305 (CARSON CITY NV BLM) #11 in graphs:

Original HA: 251,792 acres. Reduced HMA: 104,316 acres. 147,476 acres eliminated for WHs. AML: Low 118 to High 179, for Mean of 149 WHs. This represents 700 HMA-acres per individual wild horse. Unrealistic population increase reported between 2016 with 336 WHs & 2017 with 646 WHs for a 92% annual population growth rate. Latest Census 2018 reports 775 WHs corresponding to 137 HMA acres per wild horse. Recent helicopter roundups of 575 WHs in Jan.-Feb. 2019 claim to have left 200, but if population figures are overly inflated, hardly any WHs may remain in this spectacular HMA. The large reduction of acreage from HA to HMA was based on a biased & very questionable demand letter from the Bureau of Indian Affairs (BIA) agent along with ranchers, NV Dept. of Wildlife representing big game hunters, among others. (I have a copy of the poorly presented BIA letter in my possession.) I denounced this decision in the late 1970's & early 1980's. PZP darting of WH mares goes on at the southern end of the HA near Fish Springs, seemingly contrary to a Reno federal court order from 2015. I did a major ecological field study & report on the Pine Nut HMA & HA as well as the herd. This revealed the major ecological disturbance factors. Unfortunately BLM chose to ignore my findings while conducting a field investigation & issuing a report of its own that blamed wild horses almost exclusively for deteriorating ecological conditions. This report overlooked the tremendous damage being done in the Pine Nut Mountains by Off Highway Vehicles, cattle & sheep trampling & foraging, Pinyon-Juniper clearance projects, trash & pollution from visitors to the range, mining excavations, firewood gatherers, pollution from neighboring industries, illegal poaching & predator eradication programs, major wildfires exacerbated by wild horse removal, the drawdown of mountain aquifers by wells, & the monopolization of mountain springs & creeks in order to use water for rampant human development with little water conservation practices in place! This herd & herd area need to be restored & the real causes of the deterioration of this spectacular mountain range (attaining heights of 9,451' at Mt. Siegel) need to be faced & reduced or eliminated, not the wild horses whose legal area this is! By far the majority of people who live in & around the Pine Nut Mountains cherish these mustangs & want to see them protected & provided for – not betrayed! My report for Friends of Animals included a LightHawk overflight & census. (Let me know if wishing to read this.)

MONTGOMERY PASS WH JMA (CARSON CITY NV BLM/BISHOP CA BLM/USFS – INYO N. F.) #12 in g.:

This is mainly an Inyo National Forest WHT. 49,023 acres are reported by BLM Carson City office. AML: 73 WH, no low-high range given. At AML there would be 676 acres per individual wild horse. As in the Cerbat Mountain HMA in Arizona, wild horses here are documented to be self-stabilizing. Professional studies by Dr. John Turner & others indicate this stabilization is related to a high density of Mountain Lions coming off the Sierra Nevada Mountains & elsewhere. Field study tours of these wild horses have been conducted out of University of California-Davis for many years by biologist Craig London. In the 1980s, Inyo N.F. tried to zero out this herd, but I protested with a strong letter. Very spectacular area that is geologically active & offers hot springs for bathing. Earthquakes frequent. There is no assigned NV herd number. This special mustang lineage needs to have its population increased to assure genetic viability. Suspect illegal capture & removal occurring here. I visited & photographed some of these WHs in early April 2019 & they were sparsely distributed. Complaints by locals of their expansion to low-lying areas seemed aimed at further reducing this already unique but sub-viable herd. –Stunning horses to observe in this dramatic place! Public should take a much more active role in their defense!

MARIETTA WB RANGE NV0316 (CARSON CITY NV BLM) #13 in graphs:

Original HA: 66,045 acres. Reduced HMA: 64,045 acres (conflicting reports, some official sites give 66,500 acres in HMA, so I will leave off certain of my graphs). AML: Low 78 to High 104, for Mean of 91 WBs, which corresponds to 708 acres per individual WB. Latest Census 2015 for 193 WBs. This is the only “National Range” for wild burros that BLM has established. Given its rarity it is unacceptable that BLM has set a genetically non-viable AML for these WBs! In the 2015 Census, 54 WHs were counted. These are beautiful spirited horses I have observed. They should have legal recognition of their right to live here. The area is very scenic & attracts many tourists; & the wild equids here are a major attraction. In fact, these WBs preserve an endangered species called the African Wild Ass, though its more ultimate origin is North America! There is an urgent need to increase this burro population as well as this horse population. Many disturbing detonations to loosen earth occur here in surrounding mountains, including the Excelsior range to the west. Toxic emissions from mining operations as well as OHV disturbances & illegal roundups, removals & killings need to be investigated and curbed!

WHEELER PASS WH & WB JMA NV0507 (LAS VEGAS NV BLM & TOIYABE-HUMBOLDT N. F.) #14 in gr.:

HA acreage surprisingly given as “0”, JMA given as 275,575 acres. WH AML: Low 47 to High 66 for Mean of 57 WHs, which corresponds to 4,877 acres per individual WH. AML for WB: Low 20 to High 35 for Mean of 28 WBs which correspond to 10,020 acres per individual WB! Unrealistic rates of population increase reported by BLM for both WHs & WBs. For example, in 2016 it reported 25 WHs while in 2017 it reported 108 WHs for an annual increase of 332%! Again in 2009, BLM reported 27 WBs while in 2010 it reported 175 WBs for an annual increase of 548%! Clearly something is amiss! The BLM’s 2015 Census reported 125 WHs & 67 WBs, corresponding to 2,205 acres per individual WH & 4,113 acres per individual WB – both far below the honest, professionally estimated carrying capacity for either species. Clearly, the WHs & WBs are being targeted for minimization. And I am perplexed as to why the HA acres are not reported. Shortly after I visited this JMA at the end of April 2018, the BLM & USFS had a massive roundup/clearance that nearly or perhaps totally eliminated the wild horses (see more detailed account in accompanying “Observations ...” report). Officials did this in spite of the great popularity of this herd both with locals & visitors. Also, neither my own nor local observations substantiated claims that the wild horses were emaciated & lacked forage & water. The real reasons behind the herd’s gutting seems to concern powerful big game hunting interests, including from Las Vegas, backed by the Nevada Department of Wildlife (NDOW). These have targeted the wild horses. Both WHs & WBs were greatly reduced in 2015 as well as before; and NDOW has reintroduced elk & bighorn to satisfy trophy hunters. I did an observational overflight of this & adjoining herd areas including census & habitat analysis in the mid 2000’s. My resulting report for the Spring Mountain Wild Horse & Burro Coalition was presented to the BLM & USFS. Here I displayed the basic facts proving an extreme targeting of these much-appreciated and valued wild equids & pleaded for a much fairer resource allocations & Appropriate Management Level for both the horses & burros. I now see just how much closer to their destructive goal NDOW, BLM, USFS & hunters have come & how the general public along with the wild horses & burros continue to be disrespected & dishonored.

JOHNNIE WH & WB HMA FROM NV0527 & NV0506 (LAS VEGAS NV BLM) #15 in graphs:

HA acreage questionably given as “0” acres. HMA: 179,368 acres. AML WH: not given. Possibly BLM is trying to ignore wild horse rights here. AML WB: Low of 65 to High of 108 for Mean of 87 WBs, which corresponds to 2,074 acres per individual WB – a practically wild-burro-empty ecosystem. Unrealistic rates of population increase reported for WHs between 2016 with 43 WHs & 2017 with 159 WHs for a 270% annual increase as well as for WBs between 2011 with 190 WBs & 2012 with 290 WBs for a 53%

annual increase. 2015 census reported 191 WHs & 194 WBs. These figures correspond to 939 HMA acres per individual WH & 925 HMA acres per individual WB. These figures are substantially below what the carrying capacity and forage productivity for this habitat would support. With these figures we can identify an undermining of the wild equids' rights. This herd is popular & visited by Pahrump town residents & others. Those I spoke with were keenly upset by the herds' great reduction in recent years. I have been guided by locals to view the few equids who remain & they plaintively tell me how many there used to be & how much easier it was to observe & photograph them over a decade ago.

RED ROCK WH & WB HMA NV0525 (LAS VEGAS NV BLM) #16 in graphs:

HA acres questionably given as "0". HMA: 161,969 acres. AML: WH: Low 16 to High 27 for Mean of 22 WHs which corresponds to 7,533 acres per individual WH; for WB: Low 29 to High 49 for Mean of 39 WBs which corresponds to 4,153 acres per individual WB. Unrealistic reported rates of population increase: for WHs between 2014 with 92 & 2015 with 146 for a 59% annual population increase; & for WBs between 2007 with 29 WBs & 2008 with 47 WBs for a 62% annual increase. Latest Census report in 2015 show 199 WHs & 36 WBs which correspond to 814 HMA acres per individual WH & 4,499 HMA acres per individual WB. Both of these national heritage species are being targeted for levels far below their ecological niche space & contrary to the true & core intent the WFHBA. These biased levels ignore the great popularity of these naturally living equids among locals & visitors alike. They are a major tourist attraction & they prevent catastrophic wildfires (see "Observations ..." report for details).

ARMAGOSA VALLEY ?WH ?WB HMA NV0511 (LAS VEGAS NV BLM) #17 in graphs:

HA: 8,819 acres same as HMA. Appears to be zeroed out. BLM claims this area is combined with a "Complex". No details given. Bears further investigation.

ASH MEADOWS ?WH ?WB HMA NV0509 (LAS VEGAS NV BLM) #18 in graphs:

HA: 115,143 acres, same as HMA. Possibly zeroed out by decree by BLM in 1993. BLM claims the area is combined with a "Complex". No details given. Bears further investigation.

GOLD BUTTE WB HMA NV0502 (LAS VEGAS NV BLM) #19 in graphs:

HA: 271,772 acres, same as HMA. AML: Low 22 to High 98 for Mean of 60 WBs. This figure corresponds to 4,530 acres per individual wild burro. To assign such a figure shows the extreme degree to which BLM officials are mocking the unanimously passed WFHBA as well as the Multiple Use Act, NEPA, National Historical Preservation Act, among others. Also they are mocking the General Public on this very important Quality of Life issue. Their defiant attitude & the negative policies this generates should not be tolerated! A suspicious annual population increase was reported by BLM between 2007 with 31 WBs & 2008 with 60 WBs for a 94% annual increase. In its latest census in 2017, BLM reported 486 WBs, which correspond to 559 acres per individual wild burro. This is an under-population, not an overpopulation, even for this desert area where one burro per 100 acres would still not be overpopulated according to professional determinations and given adequate water. Please note that the BLM has assigned an AML that is genetically non-viable for this unique burro population, and also issued unfair forage allocations to them. Locals & visitors alike love to observe & photograph these burros, and have been doing so for decades.

OREGON

WARM SPRINGS WH & WB HMA OR0007 (BURNS OR BLM) #20 in graphs:

HA: 499,457 acres, same as HMA. AML: WH: Low 96 to High 178, for Mean of 137 WHs which corresponds to 3,646 acres per individual wild horse; WB: Low 15 to High 24 for a Mean of 20 WBs, which corresponds to 24,973 acres per individual wild burro! This is utterly outrageous! Unrealistic

report of population increases, for WHs between 2014 with 192 to 2015 with 368 WHs for a 92% annual increase; for WB between 2011 with 15 to 2012 with 35 WBs for 133% annual increase. From my field inspection in late October 2018, right after the roundup, it appears that all WHs & WBs had been removed by the helicopter roundup. Though I drove throughout the HMA, entering along many dirt roads, I saw no WHs or WBs & only in one place did I see any sign of WHs having been present a few weeks earlier. However, BLM estimates that 30 WHs & 30 WBs may remain. I made a detailed report on this herd and its HMA habitat for Friends of Animals based on my October field inspection. I took many photos & also visited the traumatized WHs & WBs who had just been gathered & placed into the Wild Horse Corrals in Hines just west of Burns, Oregon. Though magnificent horses & burros, they were very upset & depressed, in spite of being fed & watered. The plan that BLM proposed in February 2019 is as follows: for WHs, to allow only an AML of 96 Low End & for WBs only 15 Low End. In 2016, BLM censused 739 WHs & 49 WBs, which corresponds to 676 acres per individual WH & to 10,193 acres per individual WB! From any truly objective point of view, these are hardly overpopulated! However, BLM officials have dishonestly pronounced both the wild horses & the wild burros here to be “overpopulated”, all the while ignoring all the thousands of livestock unnaturally stripping forage in order to accommodate the rancher monopolization of resources & very much contrary to the WFHBA & other laws!

STINKINGWATER WH HMA OR0008 (BURNS OR BLM) #21 in graphs:

HA: 92,068 acres, same as HMA. AML: Low 40 to High 80, for Mean of 60 WHs, which corresponds to 1,534 acres per individual wild horse. Unrealistically, BLM reported a WH population increase between 2014 with 70 to 2015 with 189 WHs, for a 170% annual increase. A recent 2016 BLM census gave 275 WHs corresponding to 335 acres per individual WH. This is not overpopulated. The HMA forage resources are mainly being allocated to ranchers' cattle; & there is a big emphasis on big game hunting in the HMA, in spite of the fact that these wild horses are a major tourist attraction with an improved road & excellent new sign describing the wild horse herd – to the BLM's credit. I visited this herd in late October 2018 and took some fine shots of these spirited horses against a scenic backdrop of mountains, juniper woodlands & canyons. Discover further about this herd & habitat in my accompanying “Observations ...” report as well as my report for Friends of Animals. This picturesque herd's AML needs to be increased to prevent inbreeding & decline; and the cattle numbers here need to be decreased along with their forage allocations, aka AUMs, with attention to their seasons of use so as to not overly impact spring-season growth.

POKEGAMA WH HMA OR0018 (LAKEVIEW OR BLM) #22 in graphs:

HA: 84,963 acres, same as HMA. AML: Low 30 to High 50 for Mean of 40 WHs, which corresponds to 2,124 acres per individual WH! Unrealistic BLM report of herd growth from 2014 with 42 WHs to 2015 with 85 WHs for a 102% annual WH population growth rate. Recent BLM Census in 2015 gave 122 WHs, which corresponds to 696 acres per individual wild horse, much below what the forage productivity here would support. This is the only designated WH HMA in the Cascade Mountains. I observed rich habitat here during early summer of 2018 & included the description of my findings in my report to Friends of Animals along with a report about Devil's Garden WHT. This is another example of extreme injustice toward the wild horses and their supportive millions of U.S. citizens. In all but a slim margin of the HMA located on the extreme western edge, I did not observe any WHs, nor any sign thereof, e.g. droppings, tracks, hair, wallows, rubbing against trees or rocks, etc. The HMA has no signs indicating that this is a legal habitat for these unique wild horses; and the local public I talked to seemed largely unaware of them or of their legal status. In other words, lacking is any positive

promotion of them. Heavy logging operations, cattle presence & big game hunting are obviously monopolizing this HMA, yet large & elaborate signs touted this Pokegama Conservation Area as a great success story for nature conservation. I observed a variety of grasses with sufficient productivity to support a much larger wild horse herd. But no wild horses were to be found over almost the entire area. Something is obviously happening here to prevent them from occupying their legal area! Grasses here included Blue Grass, Needle-grass, Muhly, Brome-grass, Oat-grass, Fescue, along with the closely related graminoid Rushes. A greater number of wild horses would benefit this ecosystem by enriching its soils, dispersing a wider variety of seeds for successful germination in horse droppings, and, last but not least, helping to prevent catastrophic wildfires – a very real & serious danger given the acceleration of Global Climate Change. This latter is being propelled by the heat-trapping gases that humanity continues to pour into the atmosphere at ever accelerating rates. And it is also being caused by the destruction of life-balancing ecosystems such as forests, coral reefs, savannahs & bushlands. Wild horses would balance the previous heavy presence of ruminant herbivores, which here include both black tailed mule deer and regular mule deer, elk, and many domestic cattle. Coming from the west side, the Klamathon Wildfire of early 2018 could easily have wiped out the Pokegama forest. Earliest white settlers reported these horses as did Native American tribes, yet this herd continues to be victimized; and, if something is not soon done, I greatly fear for its future. It should be restored to a much higher level & the other selfish interests that are targeting these wonderful & ecologically benefiting presences told to back off!

General statement:

The foregoing reveals an extreme injustice toward America's wild horses & burros. This treatment of our legally protected "national heritage" wild horses & burros on these often vast & always legal habitats is antithetical to the WFHBA's true intent. Somehow this renegade attitude must be countered; & these government programs must be reformed & transformed. But "new blood" will be required, not persons who have lost the vision and, so, the will to realize the Wild Free-Roaming Horses & Burros Act with true spirit & integrity!



Photo Copyright 2019 by Craig C Downer. Cibola-Trigo Herd Management Area, Arizona. Band of four wise wild burros harmoniously adapted & contributing to Sonoran desert.