

March 23, 2020

Bureau of Land Management
Kingman Field Office, 2755 Mission Blvd.,
Kingman, AZ 86401. Tel. (928) 718-3700

Attn: Black Mountain HMA EA; Re: Black Mountain HMA Wild Burro Gather & Population Control Plan
Environmental Assessment DOI-BLM-AZ-C010-2019-0030-EA.

Public Input due in Wednesday, April 1st, 2020

Link <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=124356>

Dear Public Official:

I appreciate this opportunity to comment on your proposal for a 10-year wild burro gather and population control plan. During May of 2018, I visited some of these wild burros & their desert habitat & made observations as a wildlife ecologist that were included in a published report (link: <https://thewildhorseconspiracy.org/wp-content/uploads/2019/07/OBSERVATIONS-AND-ECOLOGICAL-EVALUATIONS-WILD-HORSE-BURRO-HERDS-AREAS-2016-2018-FINAL.pdf>). The burros I saw were sparsely distributed & were not heavily impacting the desert ecosystem, rather they seemed to be fitting in harmoniously. I noticed their droppings were enriching soils; a variety of plant species, including grasses, were springing up in & around them & they were retaining moisture & providing nutrients to these plants. Thus, through their feces, the burros were benefiting the entire food web, from many tiny soil micro-organisms & insects, to a variety of desert lizards, rodents & birds. The burros themselves were constantly on the move, dispersing their foraging over broad areas & not lingering on the lush, wetter riparian habitats. Also, from an aesthetic point of view, they animated this desert, bringing it alive in a special way that seemed to unify & harmonize its diverse elements.

Many fellow visitors along the scenic, historic Route 66 were also captivated by the naturally living burros. They stopped to study & comment on their behavior & to take pictures. The wild burros' popularity was really brought home in the historic mining town of Oatman, where dozens of visitors interacted with the burros in a friendly & mutually respectful manner. I really think that, as public officials employed to serve the public interest, you should allow for a much greater number of wild burros here within their one-million-plus- acre Herd Management Area (HMA). This is America's largest wild burro population; and the burros should not be relegated to marginal status, while livestock & other interests are allowed to monopolize the natural resources. Please remember that according to the Wild Free-Roaming Horses & Burros Act's (WFHBA) core purpose, it is the wild burros & horses who should receive the principal resources in their legal areas, not the ranchers (see Section 2c of the Act).

I agree with the proposal to have the Black Mountain HMA declared a National Wild Burro Range. This would permit a reduction in the forage resource monopoly by ranchers & permit a truly long-term, genetically viable burro population in the thousands, not the unfair Appropriate Management Level (AML) of merely 478 that you are proposing. Given there are 1,096,307 original Herd Area (HA) acres & 1,003,789 reduced Herd Management Area (HMA) acres in the legal Black Mountain burro habitat, an enormous 2,294-HA-acre/2,100-HMA-acre per individual burro would be very much contrary to the

burros' natural/ecological niche here. This would be a nearly wild-burro-empty ecosystem that would make a mockery of the WFHBA's true intent. Arid-adapted burros are perfectly suited to life in this Sonoran Desert ecosystem where they contribute harmoniously to its native plant & animal species. Even at the estimated current population level of 2,205 burros (1/20/2020), there would be 497 HA acres/455 HMA acres per individual wild burro, which is not over-populated considering the ample niche space available to burros here. I estimate the carrying capacity (K) for burros, even in this desert ecosystem, to be 100 - 200 acres per individual; and the burros would actually help revitalize & maintain this life community.

You should not ignore the great degree to which wild burros complement ruminant herbivores such as Nelson's bighorn sheep (which I have studied in the Black Mountains of Nevada) & desert mule deer also found here. This is due in large degree to the different digestive system of burros. They possess a post-gastric, caecal fermentative digestion allowing them to assimilate nutrients from the plants they eat. The difference here is that burros do not as thoroughly digest what they ingest and, as a consequence, their droppings, as compared to ruminants, are more organically intact & capable of providing more nutrients to enrich soils through the creation of vial humus. Their droppings are also re-ingested by diverse species from micro soil organisms to dung beetles & other insects & on up the line to reptiles, rodents & other mammals and diverse bird species. This is a real bolstering of the ecosystem that should not be ignored. By contrast, the ruminant grazers contribute droppings that are much more decomposed & lacking in nutrients. So ruminants contribute much less to the humus content of soils, their moisture-retaining capacity & to the food chain/web existing in the ecosystem. Remarkably, for this reason too, wild burros actually benefit ruminant herbivores, including bighorn sheep, mule deer, & even cattle when considered as natural, rather than human-imposed elements of the ecosystem. I suggest you check out the following ecological studies. These prove how equids (members of the horse family Equidae) greatly benefit many other species, including ruminant, cloven-hoofed herbivores. (See: <https://www.researchgate.net/publication/239848265> Facilitation between Bovids and Equids in an African Savanna ; MacDonald, P. 2001. The New Encyclopedia of Mammals. Oxford Univ. Press, N.Y. Hoofed Animals, Pages 456-458 & 471-472. To quote from the above: "By opening up the habitat, zebras facilitate coexistence with the more selective ruminants that need higher quality vegetation." Also <http://www.princeton.edu/news/2012/02/20/wildlife-and-cows-can-be-partners-not-enemies-search-food?section=featured> . To quote: "... cattle paired with donkeys gained 60 percent more weight than those left to graze only with other cows." And in addition: <https://www.researchgate.net/publications/267285340> Reintroduced species as vectors for seed dispersal . This study found that wild asses transported the highest number of plant species (15) & the highest number of unique species (8). And again: Oestermann-Klein, S. et al. Impacts of feral horses on a desert environment. Link: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2781800/> To wit: 'Horse quadrants near feces had significantly higher plant diversity than all other locations. Quadrants near horses feces held the highest percent of native species.' ... Many other studies prove the beneficial effect of equids, including burros, to ecosystems (ask me).

The so-called African Wild Ass, including Nubian & Somalian subspecies, is Critically Endangered (IUCN SSC). It is basically the same interbreeding species as the wild burros found in the Black Mountain HMA. We should remember that all branches of the horse family Equidae originated & evolved over the great majority of their time on Earth in North America. Given the above, the establishment of genetically

viable burro populations in the wild, i.e. in their natural habitat where their true vigor is restored & preserved, is crucially important for the species' survival. We should be restoring the wild burros of the Southwest United States to truly long-term viable populations, not reducing them to mere token, genetically non-viable levels. These animals should actually be protected under the Endangered Species Act. The Black Mountain wild burros constitute the largest wild burro herd on U.S. public lands, which certainly numbers among the largest in the world. They should not be cut down by 1,727 living, breathing, feeling individuals! Their conservation value for the survival of their species is critical.

Chapter 1. Introduction. I strongly recommend against the use of PZP on these wild burros. There is substantial evidence that this leads to a weakening of their immune system, a considerable increase in stress, a breakdown of social order & an increase in the reproduction by sub-mature, less well established individuals. When the female jennies come off its effects, PZP can also lead to a higher percentages of out-of-season births, miscarriages, & deformed or otherwise defective foals. I also oppose sex-ratio-skewing, ovariectomies, gelding of males, administration of GonaCon & other highly invasive alterations of the burros' innate character. All of the above should be rejected as contrary to the true intent of the WFHBA, which emphasizes allowing them to live naturally & freely with minimum interference. I propose a sound Reserve Design strategy that will result in a herd's self-stabilizing numbers, harmonious ecological adaptations & long-term genetic viability. Reserve Design will be conducive to truly thriving natural burros that will carry on far into the future, rather than go into a tailspin after a relatively few generations. -- I welcome you to examine details of my Reserve Design proposal at www.gofundme.com/mstngreservedesign .

Page 5: The current burro population level of 2,205 indicates that the burros have an important niche to fill here in this part of the Sonoran desert & should not be regarded hysterically & denounced as overpopulated. Given their ancestral presence here, their very numbers show they have a niche to fill. Even given the lesser National Parks Service & BLM lands combined: 732,068 acres, there would still not be an excessive number of burros. This latter figure divided by 2,205 gives 332 acres per individual burro, which is not an overpopulation (see above discussion).

In relation to the 22,719 acres in Fort Mohave Indian Reservation that is part of the original Herd Area, but not recognized as part of the HMA, you should set up a Cooperative Agreement under WFHBA's Section 6 in order to provide a more complete & long-term-viable habitat for the burros.

Your justification for the large-scale removal of 1,727 burros includes claims that they reproduce without control & are incapable of stabilizing their population growth. This biased view is not based on facts. Burros are what population ecologists call "climax species" capable of limiting their reproduction once they fill their ecological niche. When the males, or "jacks", are allowed to establish individual territories, they defend these territories; and over time this process soon results in a mosaic within the habitat in which a mature & balanced society of burros reduces reproduction by younger, less established members of the population. Think about the fact that burros have been here for millions of years & are ancient in origin. If it were true that they only reproduced without any intrinsic controls, they would long ago have become extinct, since any species that destroys its habitat & fails to achieve a wise balance with other sympatric species soon perishes.

Your (BLM) proposed reduction of the burro herd by 1,727 would greatly set back the process of natural adaptation by these burros that has been going on for many generations. Though you say this would be

done to establish a “thriving natural ecological balance,” in fact, it would be done to accommodate the monopolization of the cattle ranchers mainly, along with other public land resource exploiters.

As concerns water resources, it has been proven that burros dig wells that make water available to a variety of important plant & animal species, including keystone cottonwood trees & willows, bighorn sheep & desert foxes & a host of others. See: <https://www.horsetalk.co.nz/2016/06/05/secret-lives-wells-digging-burros/> To paraphrase: ‘Digging of wells by burros provide a much-needed clean water source for at least 30 species of mammals & birds, as well as riparian habitat germination nurseries.’ To overlook this important contribution by the naturally living burros is dishonest & discriminatory, especially since this is their legal habitat where they should be the major, not the minor, presence. And don’t forget to remember how they build healthy soils that retain pure water. By the way, other equids such as zebras, onagers & horses can do the same. See <https://www.youtube.com/watch?v=xf7vjt4lZoE>

Chapter 2: Proposed Action. I strongly oppose this plan. It paints a picture that is very unfair to naturally living burros & employs an incomplete set of facts & interpretations that have been deliberately chosen to discredit the place of the burros in the Sonoran Desert where close burro relatives lived for thousands, even millions of years. (See: MacFadden, B.J. 1992. Fossil horses: systematics, paleobiology and evolution of the family Equidae. Cambridge Univ. Press, UK; and also: Martin, P.S. 2005. Twilight of the Mammoths: ice age extinctions and the rewilding of America. Univ. of Calif. Press, Berkeley.)

The unnatural skewing of 60% males to 40% females will cause terrible stress to the burros. This will especially result in more harmful & even lethal fighting among males. This will disrupt the stable social herd structure. We should, instead, take a more respectful attitude toward these ancient & wise presences as part of all the Great Rest of Life. We should let the burros show us what marvelously well-fitting proportions & balances they are capable of. Their species has been at this for a long time. We humans should take a lesson from them concerning how we too could come to harmoniously fit, rather than be ever imposing an insensitive way of taking advantage of this awesome – in many ways magical -- desert ecosystem.

2.4. Alternative D: Your claim the burros would never decrease their growth rate until ecological collapse brought on a population crash is hyperbole & not proven. There exist many controls, both extrinsic & intrinsic, that come into play as resources decline & that would serve to limit the natural increase of the burro population. To plug in one rate of increase underestimates also the significant natural mortality of both newborns to yearlings as well as adult burros, particularly those beyond their prime. And it also ignores how burros self-limit their reproduction as resources grow scarcer.

2.5. No Action Alt. You claim that burros would continue to explode at 15% per year resulting in 3,800 in five years is highly questionable. Also you mention nothing about Wildlife Services reducing the natural predators such as puma, coyotes & wolf to serve the livestock & big game hunting industries on these public lands. This is often major & should be included in your analysis.

Pg. 8. Table 3. This projected population increase is exaggerated & does not present a thoughtful state-of-the-art analysis. It ignores the natural role/niche of the burros in the Sonoran Desert & how burros fine tune themselves to the cycles & vagaries of nature, including the climate. You forget these are ancient survivors who have survived for ages.

2.6: Wild horse & burro gathers should not be allowed during the foaling season from March 1 to June 30, according to BLM regulations, to prevent terrible suffering and death of the burros.

Pg. 9: I recommend building fences to prevent problems in human populated areas, stepping up public education, & building natural habitat over- & under- passes in order to accommodate burro presence, also taking down fences wherever possible within the HMA to permit their free-roaming lifestyle that is core to the WFHBA. You should also recognize the great value of wild burros as reducers of dry flammable vegetation & boosters of water tables through soil enrichment – hence they mitigate & even prevent catastrophic wildfires.

Pg. 12; Burros have a different social structures than horses. Population controls will affect them somewhat differently than horses. You make no mention of reducing livestock within the HMA or cutting back on OHV disruption of habitat, or other avenues you could take to allow for more burros commensurate with the actual niche space that exists for them here. This is a very simplistic analysis that lacks a thoroughgoing approach, especially as concerns additional possible alternatives to allow for a long-term-viable & ecosystem-adapted burro population.

2.9.3. Pg. 12 – 13: Raising the AML. You suggest this would not be possible. I disagree. Doesn't PRIA say resources shall be annually monitored & adjustments made in resource allocation as they change?

2.9.4. Remove or Reduce Livestock. Why is this "outside the scope"? It seems this is a convenient excuse for not standing up for fairer population & resource provisions for the wild burros. True Multiple Use on Arizona BLM land & in our nation would be represented by letting the burros have a higher population & resource allocation in their million-acre-plus Black Mountain HMA, not allowing livestock monopoly within the HMA -- as is typical on so much of U.S. Public Lands.

2.9.6. I greatly favor this – manage for wild burros primarily within their HMA & vicinity. This would obey the true intent of the WFHBA (see Section 2 c). And it is not true that this would be disallowed by FLPMA, for this would implement truer Multiple Use in America!

2.9.7. Pg. 14: The claim that all wild horse/burro are overpopulated in Arizona is not true. Many are under-populated, like the Cerbat Mountain Wild Horse HMA north of Kingman, which I visited.

3.2. Pg. 15: Fire Management. I disagree. The removal of 1,727 wild burros would increase the risk of catastrophic wildfires, since they greatly reduce dry flammable vegetation as well as increase the water-retaining capability of soils through their droppings.

3.3.1. Pg. 19 – 20: A major oversight is that you do not even mention that the burro branch of the horse family Equidae originated in North America and was here for millions of years, including very closely related species of the burro & possibly even the modern-day burro species itself (see Klingel, Hans. 1979. A Comparison of the Social Organization of the Equids. **IN:** Symposium on the Ecology and Behavior of Wild and Feral Equids. Proceedings: Univ. of Wyoming, Laramie. Sept. 6-8, 1979). Also the claim that these burros do not self-regulate their population size except through periodic die-offs is false. Burros are ecological "Climax species" capable of self-regulation of population size once their niche space is filled. You also fail to mention the massive natural predator elimination by Wildlife Services that has direct bearing here. Also, you should not minimize the importance of burros' proven digging of natural wells & its substantial benefit to many plants & animals, as proven by Dr. Erick

Lundgren in his dissertation work.

Pg. 20: I again disagree. There is a significant niche separation between the burro and the bighorn sheep, the latter occupying steeper, rockier, more sheer habitats where the burros cannot reach. And burros complement the bighorn sheep in a mutualistic way, as earlier discussed.

Pg. 23. You praise the benefits of the wholesale gather removal of the majority of the wild burros, 1,727, as benefiting the burros themselves as well as the rangeland resources. I disagree, as the great majority of the burros who have established themselves here would suffer very stressful & traumatizing removal from their natural homes & there would be no accompanying reduction in cattle grazing in the HMA. I also object because substituting natural selection for human selection would set back the natural adaptation of the burros & disrupt many wholesome processes in this valuable wild-burro-containing ecosystem. Also, you are failing to reveal the actual relative proportions of livestock forage consumption versus wild burro forage consumption. This conceals the unfairness by which the great majority of forage is being given to ranchers & the wild burros are being cheated within their own legal HMA!

Though you glibly taut the sterilization of the female jennies with PZP & the unnatural skewing of the sex ratios so that only 27 foals will be produced per year, you conveniently overlook all the stress & disruption of social cohesion caused by this unnatural tampering, which is a form of domestication that is contrary to the true intent of the WFHBA. Again, I urge you to consider my Reserve Design proposal.

Pg. 24. This considerably underestimates the amount of stress this capture operation would cause these intelligent & sensitive, harmoniously adapting animals.

Pg. 25. You fail to recognize the burro suffering/death that happens at higher rates in the holding pens.

Pg. 26. I disagree with PZP, PZP-22, GonaCon, sex-ratio skewing, etc. These alter the natural social structure of wild burros & negatively affect their well-functioning as a unit for successful survival & harmonious adaptation, something that requires patience to allow to happen on the part of us humans, a virtue we are not always noted for, especially in our modern age of maximum nature exploitation.

Pg. 27. The treating of 50% of females with fertility control vaccine will change the natural age structure of the population, resulting in more aged burros. I object to this because it will undermine these wild burros' natural vitality/vigor & this will jeopardize their long-term survival. Also, when jennies come off of PZP's effect, there will likely be more out-of-birth-season births, as well as deformed & still born births. And of crucial note: since PZP contraception is least effective in jennies with weaker immune systems, over generations this will weaken the burros' immune system, setting them up for die out due to disease, extreme climate events, harassment, & various vagaries of nature.

Pg. 28. By massively removing a large portion of the burros, you will be causing much territorial & social instability, resulting in many more flights between male jacks vying for vacant territories.

Pg. 29. Environmental Effects of No Action Alternative: Your statement ignores the naturally living burros ability to self-stabilize their population. Your "take" on this subject is not true-to-life, but rather seems to be politically motivated to favor chiefly livestock interests. Do you really think that these poor cattle are integrating harmoniously with the public lands ecosystem? They don't even contribute their mortal remains to the life community that nurtured them. Rather, they go off to be fattened then consumed by humans in a non-reciprocating way. Your view ignores the burros as beneficial members of this Black Mountain desert life community that complements the plants & animals, resuming age-old relationships that burro ancestors formed over thousands, even millions of years. -- Answer me this: if the burros were so inherently destructive, then how come they are such an ancient species that has survived for millions of years, including right here in North America? If they were intrinsically destructive as a species, they would never have survived beyond a relatively few generations, because they would

have destroyed their home habitat. And remember, as per Darwin, there is a “struggle for survival” in & among all living creatures that occurs at the self, family & species level. And this struggle is especially strong when a species such as the burro has such an extensive ancestral pre-adaptation as the burro does here in the Southwestern deserts. I consider quite admirable its tenacious striving reestablish its kind & to fulfill its role.

Pg. 30. Concerning Animal Units, you fail to specify that a burro eats much less than a cow set out on the range. Generally a burro’s foraging for one month is only one half of an AUM, i.e. 1 AUM = 2 burros subsisting for one month on the public lands, or elsewhere. This is in BLM regulations.

I object to your statement in the second paragraph. This shows a biased targeting of burros & an ignoring of their justified place in Nature. Your statement: “Burros can be more destructive to the range than cattle due to their differing digestive system and grazing habits” is a biased view, since there is much solid evidence that the very opposite is true. Cattle lack the upper incisors that burros possess & often rip plants up by the roots using their tongues to grasp grass & pulling this over their teeth. Also cattle’s multi-stomach, ruminant digestion extracts much more of the nutrients from the food they eat -- & at great metabolic expense when their forage is coarse & dry & highly fibrous. Consequently, their droppings/feces offer little in the way of nutrient value, humus & water retention contributions to soils, etc. These are much greater in burro droppings/feces that “feed” the ecosystem in many ways due to the burros’ post-gastric, caecal digestive system. The latter is not as thorough in its extraction of nutrients with ruminant digesters but this produces major advantages for the ecosystems they inhabit, which include how they pass many more intact germinable seeds of greater variety than do ruminants.

The wild burros are real gardeners of the desert, transporting nutrients far & wide & enhancing the plant & animal community. And this substantiates WFHBA’s declaration that wild horses & burros “contribute to the diversity of life forms within the nation and enrich the lives of the American people”.

Another oversight in your document concerns how the cloven hooves of cattle & sheep cut deeply into soils, especially apparent with the genetically upsized cattle today. This contrasts with burros’ & horses’ blunt, rounded hooves. Again, you ignore that burros disperse intact seeds of many native species, but just mention the non-native seeds. And you overlook how cattle really do camp on water sources, especially during critical dry seasons. This is due to their having evolved in moister habitats mainly in Europe. This is no fault of their own, because they are domesticated enslaved animals that are not even allowed to naturally adapt to the desert ecosystem into which they are placed in unnatural numbers. I believe that if left on their own here, they would either harmoniously adapt or perish.

Bottom Paragraph: You present a skewed interpretation that targets the wild, naturally living burros while ignoring ranchers & their livestock & other actors here. They bear true responsibility for what has & continues to happen. In effect, you lump the burros with the domestic cattle set out on the range, but then unfairly attribute practically all the blame for ecological degradation upon the wild burros. This is not how objective science works, nor is it fair or just, especially given that this is the wild burros’ legal habitat where they should be the principal presences according to the WFHBA & the just & fair-minded interpretation of several other laws.

Pg. 31. Table 6: You fail to independently analyze the effects of cattle versus the effects of wild burros, as well as bring other important factors into the equation, such as Off Highway Vehicles (OHVs), Global Climate Change/Warming/Heating, Big Game Hunting pressures, Mining & Energy Extraction, Natural Predator Elimination, Pollution – all of which can be major!

Pg. 32. Here you fail to recognize the significant positive contributions burros make to soils, as already discussed. You should reduce cattle not burros!

Pg. 32 – 33: Env. Effects of No Action Alt.: The problem here is that about the only action you are proposing is to remove nearly all the wild burros. You consider no reduction of cattle in the HMA, no erecting of fences to keep burros off private property, no freeing up & providing additional water sources, no positive public education about the wild burros & their positive place & role here, no construction of over/under passes, etc. You present exaggerations & filtered facts leading to tendentious conclusions that often show circular reasoning; & you engage in considerable hyperbole. This is not the fair & objective analysis of all the major factors that is expected of trusted public officials. As to the alternatives you have presented, you fail to give a reasonable variety of alternatives to choose from. Basically I feel you are doing a “squeeze play” on the wild burros in spite of this being their legal area where the principal resources should go to them, not ranchers, as per Section 2 c of the WFHBA.

3.3.3. Pg. 33: Again you exclusively blame burros & ignore livestock impacts, ecological damages from vehicles & roads, etc. Also, why do you ignore the positive contributions burros make to ecosystems, which, in addition to those presented earlier, include the digging of wells that enable many other species, both plant & animal, to access more water & to thrive to a greater degree (see <http://www.horsetalk.co.nz/2016/06/05/secret-lives-well-digging-burros/> or how burro droppings build richer & more moisture-retaining soils, earlier discussed (see https://www.researchgate.net/publication/239848265_Facilitation_between_Bovids_and_Equids...)

3.3.4. Wildlife Resources. Your discussion again ignores many positive contributions by wild burros to the desert ecosystem, as above presented.

Pg. 35. Special Status Species: Again you ignore the positive contributions by burros & how these could actually benefit the SSS.

Pg. 36. Inconsistency: at first you reveal there are 16 grazing allotments, later 14, 6 of which are in ephemeral use areas, which causes me to believe that you are putting the squeeze on the wild burros in their legal areas. I recommend you cancel grazing permits in certain areas like these ephemeral areas to allow more seasonal habitat for the burros.

Table 7. I can see forage resources are being largely managed for livestock, not burros & you are not taking a hard look at the impacts of status quo livestock pressures. Also, I note that 9 of the 16 grazing permittees are at or nearly 100% within the HMA.

Pg. 37. Again there is no honest consideration of damaging effects by livestock presented in this EA.

3.3.6. You ignore significant mitigating measures possible to prevent collisions with burros, such as strategic fence placement, Strieter Lite Light Reflectors (see Strieter-lite.com), construction of natural over- (preferable) & under- passes for wildlife including burros, significant lower speed limits, public education coupled with increased law enforcement & publicity. And why overlook Sections 4 & 6 of the WFHBA, which allow for Cooperative Agreements that could benefiting both the wild burros & many other species, including our own. You are treating the naturally living burros here as if they were domesticated animals & failing to recognize their justification as naturally living species & their many positive contributions to this unique ecosystem – as well as to the many people who enjoy visiting, watching, studying & photographing them. I believe this is a moral issue concerning all burro-kind & the tremendous service they have performed for human-kind over the centuries.

Chapter 4. Pg. 39. Cumulative Effects Analysis: While providing some useful background, this treatment seems cursory & incomplete. Your failure to even mention the ancestors of the burros who lived here for thousands of generations shows a real blind spot. The description you give favors human

exploitation of resources. Little concern or interest about the great & justified intrinsic value of a wild-burro-containing-ecosystem in the Black Mountain HMA is expressed.

Pg. 41. Regarding Foreseeable Future Action, you merely plan on continuing livestock grazing & mining indefinitely & to manage the public lands primarily for resource exploiters. I strongly object, since you are ignoring the principal rights of the wild burros & of the General Public that greatly value them. You should change this by upholding the WFHBA, not subverting it!

Pg. 42. Cumulative Effect of No Action Alternative: 3,800 burros by 2024 is quite questionable. The negative scenario you describe reveals an unfair targeting of the burros; what you present as a solution is a form of burro domestication that violates the true spirit & intent of the WFHBA, NEPA, Multiple Use Act, National Historical Preservation Act, Endangered Species Act, FLPMA, PRIA & other laws.

Closing Statement:

For the above reasons, I favor the NO ACTION alternative. I protest the Proposed Alternative A, whose plan is very unjust. I urge you (BLM) to employ the sound principles of Reserve Design to allow the burros to naturally adapt, fill their niche & role & achieve a truly genetically viable population level of at least 2,500, which is the IUCN SSC Equid Specialist Group recommendation for a viable equid population in the wild (Duncan, P. 1992. Zebras, Asses and Horses: An Action Plan for the Conservation of Wild Equids. IUCN Species Survival Commission. Gland, Switzerland). There are ways, especially through habitat containment, by which the burros could fill their niche & attain population self-stabilization (see the Reserve Design proposal at www.gofundme.com/mstngreservedesign).

Finally I strongly oppose the invasive application of PZP, PZP-22, GonaCon, castration, ovariectomy, & other sterilizing drugs & procedures as well as the skewing of sex rations. These violate Section 3 a of the WFHBA, the “minimum feasible level” of interference requirement of the BLM & US Forest Service concerning how to treat the wild burros & horses & their legal habitats throughout our magnificent American Western lands.

I look forward to your response to the above points & urge you to contact me with questions & concerns. I would appreciate your keeping me informed on this important plan development & wish you success in fulfilling your very vital & important work.

Sincerely,

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Cc: Various interested parties.