

April 16, 2020

Kimberlee Foster, RSFO Manager & EA & EIS Team
Bureau of Land Management, Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901
Tel. (307) 352-0256; Fax (307) 352-0329

Re: Public Input to Draft Resource Management Plan (RMP) Amendment and Environmental Impact Statement (EIS) for Wild Horse Management in the Rock Springs and Rawlins Field Office, Wyoming. Doc. # DOI-BLM-WY-D040-2011-0001-RMP-EIS. January 2020.

Link to document: <https://go.usa.gov/xdDV3> Comments due by Thursday, April 30, 2020. Comments can be made via the link, or mailed/faxed in.

Dear Public Officials:

As a wildlife ecologist, I appreciate your providing me with this opportunity to review & comment on your extensive document. In this you seek to justify BLM's elimination of wild horses from 2,466,118 acres, or 87.7%, of the original 2,811,401 acres contained within the four legal wild horse Herd Management Areas (HMAs) in question, namely: White Mountain, Great Divide Basin, Adobe Town & Salt Wells Creek. While I learned much while perusing this document & appreciate the professional team's putting this all together, I have noticed throughout a pervasive slanting & filtering of the information so as to discredit & disfavor the wild, naturally living horses here within one of their greatest legal & most appropriate natural strongholds in our great nation. As a Daughter of American Revolution Award recipient for Excellence in American History (high school) & one who worked with Velma Bronn Johnston, aka, Wild Horse Annie, ISPMB & several other groups including Animal Protection Institute, The Cloud Foundation & Friends of Animals to establish a true implementation of the unanimously passed Wild Free-Roaming Horses & Burros Act of 1971 (WFHBA), I am keenly disappointed by your Proposed Alternative D. This would abandon the rights of these wild, naturally living horses to some of their ideal natural habitats. They have legal rights in in this vast region of the West where the prairie landscapes are perfect for them & they can run free as the wind. I have visited these wide-open spaces & the herds who roam them on numerous occasions over the years. They are awesome in these places – expressing a special beauty that is realized precisely because they live freely & naturally. Their being here is the heart & soul of the WFHBA, which we should honor & protect, not undermine!

Alternative D primarily dishonors the wild horses, but also the many millions of Americans who cherish these wonderful animals. Their living freely & naturally in their legal & adjacent natural habitat at genetically viable population levels with long-term-viable resources available to them should be a top goal of BLM. As you well point out, among their requirements are Food, Water, Shelter and Space, but by denying them 88% of their original legal habitat, you would be putting a tremendous squeeze on this historic wild horse population. And by very probably interfering with their natural reproductive & social system, you would be domesticating these "national heritage" animals & violating Section 3 (a) of the WFHBA that mandates BLM & US Forest Service manage wild horses & burros so as "to achieve and maintain a thriving natural ecological balance on the public lands" & "at the minimum feasible level." In other words, the chief aim of your wild horse program should be to assure the long-term health & well-being of the wild horses themselves, not their traditional detractors & enemies, which you should defend the wild horses against! Furthermore, I remind you that Section 2 (c) of the WFHBA defines a

wild horse / burro range (meaning its original year-round 1971 area, not the present reduced concept of “range” as a minor & rarely designated portion of original areas) 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 management concept for the public lands.” (Emphasis added.) The problem with the alternatives you have presented is that you are ignoring the “land ... devoted principally” provision of the WFHBA – a crucial part of this law’s core intent.

I will be commenting in detail upon various sections of your Draft EA, but I want to make clear at the onset that the alternatives you have presented are inadequate & ignore some brilliant possibilities that should be carefully considered & even adopted as the proposed alternative. One that I most favor is the Reserve Design approach to achieving truly wild, free-roaming & naturally adapted, genetically viable herds within a naturally defined & complete wild horse habitat that provides for all the herd’s needs & allows for the natural self-stabilization of its numbers. For details I urge you to consider my Reserve Design proposal at <https://www.gofundme.com/mstngreservedesign>. I hope you will give this some serious thought & would welcome the opportunity to collaborate with you on the Reserve Design approach. It would adhere to the true spirit & intent of the WFHBA.

Of the four alternatives you present, I definitely prefer Alternative A, the so-called “No Action” alternative. It is the only one that even attempts to achieve a modicum of justice for these wonderful horses -- any slight degree of fairness & compassion toward them as well as consideration of the General Public’s stake in this very important Quality of Life issue.

Specific Comments:

From Table 3-2 in Section 3.10, Livestock Grazing, you list the name of all the livestock grazing permittees in all the four HMAs & the quantity of Animal Unit Months (AUMs) each are permitted & the percentage of these AUM allotments that occur within the legal HMAs. To me this is very telling! The great majority of these have 100% or nearly 100% of their livestock grazing occurring within the wild horses’ legal HMAs. – So much for the “land ... devoted principally” provision of the WFHBA! And as you clearly state on page 54, “the majority of the allotments in the planning area are considered lower-elevation allotments, and livestock turnout in these allotments typically occurs from March to May.” March to May are early to mid-Spring months that would seem to produce the most nutritious vegetation for the livestock to consume. This leaves what remains for the wildlife including wild horses to survive on during the rest of the year & puts them at a distinct disadvantage. Clearly, the legal wild horse habitats in these four HMAs are not being “devoted principally” to the wild horses’ benefit, but rather to that of the ranchers & their livestock – animals, I hasten to add, who are not allowed to naturally adapt to the ecosystems in question, but are fattened up, allowed to calve or lamb, then removed to be further fattened up for slaughter & consumption by humans. Also on page 54, it is stated that “[s]ome livestock operators (especially sheep operators) move their livestock to the USFS-administered allotments from July to October” & that “there are several BLM-administered allotments at higher elevations where grazing doesn’t begin until June. Typically, the season-of-use for these allotments is four to six months.” Again, this proves that ranchers’ livestock are being primarily catered to within the legal wild horse HMAs & elsewhere, not the wild horses themselves, since the livestock get to consume the principal portion of the forage & at the most nutrition-providing seasons, leaving what is left for the Great Rest of Life to try to survive on year-round! I also would like to remind you that the most nutritional forage at higher elevations is produced more during the summer months. So, livestock

are favored throughout the year then removed for consumption by modern society. Clearly they are not allowed to naturally adapt on a year-found basis to the ecosystems they occupy, which is what the wildlife including wild horses should be allowed to do.

The mere token numbers & forage allocations that are proposed for the wild horses in their four legal HMAs here would be a travesty of justice! The Proposed Alternative D would allow an Appropriate Management level of only 259 to 536 wild horses in a reduced portion of the Adobe Town HMA that eliminates all wild horses from acreages within Adobe Town's Rock Springs F.O. jurisdiction & allows only those in the Rawlins F.O. jurisdiction. The other three HMAs: Great Divide Basin, Salt Wells Creek & White Mountain would all be "zeroed out" of their wild horses, ironically converting these HMAs to Herd Areas (HAs), which was, along with "range," an original term for a legal wild horse/burro area where they were to receive the principal resources & where they were found in 1971.

So we see that **at the mean AML of 398 horses, BLM proposes to allow only one individual horses per 7,064 acres of legal Herd Management Area land! Given that 640 acres equals one square mile, the BLM is planning on only allowing one individual wild horse per eleven square miles of its original legal areas.** Such treatment of the wild horses would be outrageous! It would reveal the extent to which established interests conspire to "do in" the wild horses & their thousands, even millions of human supporters among the General Public.

Considering just the acreage in the reduced-by-102,854-acres Adobe Town HMA where wild horses will still be allowed to remain in the Rawlins F.O. jurisdiction: 355,094 acres (see pages 23-24), **at the mean AML of 398, only one individual wild horse would remain per 892 acres / 1.39 square miles,** & the majority of forage & water, etc., would be given to ranchers & their livestock to profit from at the wild horses' expense & contrary to the true intent of the WFHBA & the will of the American people.

It seems the "squeeze play" against & targeting of wild horses never ends! It continues in other portions of Proposed Alternative D including its plan to use many different, open-ended "tools to manage the wild horse population" including possible cruel gelding of stallions & ovariectomies of mares, chemical sterilizations, sex ratio alterations that would be contrary to the horses' natural harem social structure – among many other "no-holds-barred" possibilities. Though BLM claims these would be carefully analyzed, based on its past record & siding with the wild horses' traditional enemies, I would not count on what's best for the wild horses happening. For this reason there must be constant, well-informed & percipient public vigilance from members of the public who truly appreciate & cared about wild horses IN THE WILD & their rights to long-term & complete viable habitats on & adjacent to the public lands, as well as about their not being turned into disrespectfully altered, semi-domesticated animals, i.e. treated like livestock in perverse disregard for WFHBA's true intent.

Introduction on pages 1 & following:

BLM is failing to appeal the outrageous Wyoming Federal Court ruling that allows the Rock Springs Grazing Association (RSGA) to have their way on the Checkerboard lands! The RSGA is refusing to share the equal blocks of public BLM lands which adjoin their private lands with the wild horses. These public land blocks are the wild horses' legal areas & BLM must not abandon their official duty to uphold all the laws of our nation. They must not merely bow down to bullying livestock interests while abandoning the wholesome interests of the General Public. **For this & related reasons, I urge BLM to appeal this very unjust ruling in order to uphold the WFHBA's true intent.** To do otherwise would reveal an insidious anti-wild-horse attitude & a shirking of legal duty! BLM must not merely go along with RSGA's reneging

on its earlier agreement to allow the wild horses to remain on the Checkerboard lands. If they persist in this hostile attitude, BLM should cancel RSGA's grazing permits. This is justified by U.S. Code of Federal Regulations 4710.5 & 4710.6 that specifically provide for the curtailment or cancellation of livestock grazing privileges on public lands in order to ensure thriving, healthy herds of wild horses & burros in their legal areas. This would truly "achieve and maintain a thriving natural ecological balance on the public lands" as per Section 3 (a) of the WFHBA.

Page 5 & throughout the document:

BLM generally portrays wild horses as producing negative impacts on soils, water, wildlife & just about any other factor under consideration & makes light of or begrudgingly admits in minimizing fashion any positive contributions that wild horses make. This agency largely ignores the fact that the horse species, *Equus caballus*, originated & had its long-standing evolution over millions of years & right here in North America, including the very areas where the four HMAs in question are located. In substantiation of all these wild-horse positives, I refer you to my peer-reviewed article: "The horse and burro as positively contributing returned natives in North America." Its link is:

<https://www.sciencepublishinggroup.com/pdf/10.11648.j.ajls.20140201.12.pdf>. This sets the record straight on much of the blind, misleading & negatively skewed disinformation that is put out by the enemies of wild, naturally living horses & burros in our country, North America & the world. Wild horses are ecosystem enhancers who complement & assist ruminant herbivores due precisely to their differences including: (a) their "post-gastric & caecal" digestive system, (b) their different, less soil-cutting, rounded & blunt hooves, (c) their possession of both upper & lower incisors, (d) their greater natural mobility, along with a number of other important factors largely ignored in government documents in recent years. The biased targeting of these wonderful animals cannot be allowed to continue, as it is only digging our great nation into an ever deeper hole! -- I request that my above-cited professional article be considered a crucial part of my official input to your present plan. In particular, it should be considered as a refutation of your claim in the Introduction that "the lower number of wild horses in the planning area is expected to have positive impacts to wildlife, soils, vegetation, livestock and water resources." The greater more fact-based holistic truth here is that wild horses contribute positively to all of these & more when allowed to fill their natural niche within the ecosystem, which is to say, when not set up for failure, scapegoated and, in general, subjected to a hostile "squeeze play."

I highly recommend that BLM recognize all prevailing "Fence Out Laws," including both state & local. These would obligate RSGA ranchers to fence wild horses off their private Checkerboard lands. This would counter their arrogant, unfair & unreasonable demand that they be totally removed from these.

Toward the end of your draft EA, you admit that the removal of wild horses from the great majority of this original legal area will result in increased dry grasses & finer vegetation & that this would pose the risk of increased wildfires. You should not understate this very important & timely positive contribution by wild horses in mitigating & even preventing wildfires. These are becoming more & more frequent & severe in many areas of our nation due to the increasing temperatures that have been bought on by so much of humanity's consumerist lifestyle. This blindly & insensitively continues to pollute the atmosphere as well as water, soils, & the very bodies of plants & animals themselves. To ignore/deny Global Climate Change/Warming/Heating is criminal in the extreme! It is to ignore a very serious threat to all of precious life on Earth today! As I point out in my article and in the references I therein cite, wild horses have been proven to be major mitigation agents & even preventers of catastrophic wildfires & their presence as fair, viably sized herds has saved vast forest, chaparral, meadow, grassland, riparian &

other types of ecosystems, both here in the West & throughout the world. Other equid species such as burros & species within the mammalian Order Perissodactyla can & do play the same crucial role throughout the world. -- I offer a professional PowerPoint presentation on this endangered order & welcome opportunities to present this.

Additionally, I urge you to consider additional empirical information & proposals that wild horse conservationist Bill Simpson has made public. His "Wild Horse Fire Brigade" plan for preventing extreme & damaging wildfires should not be thoughtlessly dismissed, especially given the looming threats of Global Warming. To learn more about this go to the link: <https://www.horsetalk.co.nz/2017/07/31/wild-horse-fire-brigade-work>. On his Wild Horse Ranch, the presence of a substantial number of wild horses greatly reduced dry sub-story "tinder" vegetation, which saved not only his 1,000-acre ranch from burning up but also the extensive Siskiyou National Monument located in northern California & southern Oregon. This was the Klamathon Fire of a few years ago. He also has proven the major value of Juniper trees to ecosystem health, including the mutualistic symbiosis of this tree with horses & many other interrelated species as well as soils & aquifers.

It is well proven that horse droppings build healthy, nutrient-rich & moisture-retaining soils to a greater degree than do most ruminant herbivores such as cattle, sheep & deer. This is due to the fact that horses' feces are less decomposed, i.e. less thoroughly digested. (The same applies to other Perissodactylas such as rhinos & tapirs) This major positive factor concerning wild, naturally living horses should not be ignored. This would constitute dishonesty – which never pays in the long run! We should recognize that by building healthy soils & contributing more intact germinable seeds of a greater variety, naturally living horses increase the water-retaining capacity of the land they inhabit, including aquifers, water tables, streams, lakes, etc.

For your convenience, I have compiled a list of references that substantiate points in my input on your plan for these very important legal wild horse HMAs in Wyoming. Here are the links:

https://www.researchgate.net/publication/239848265_Facilitation_between_Bovids_and_Equids_in_an_African_Savanna

<https://www.princeton.edu/news/2012/02/20/wildlife-and-cows-can-be-partners-not-enemies...>

(Above found zebras esp. removed rough upper dead stem grasses permitting more delicate and nutritious grasses to spring up thus benefiting many ruminant herbivores.)

https://www.researchgate.net/publication/318163234_Pleistocene_megafaunal_extinctions_and_the_functional_loss_of_long_distance_seed_dispersal_services

<https://www.thesprucepets.com/horse-manure-facts-1887394>

<https://www.horsetalk.co.nz/2017/09/25/evolution-wild-horses-cattle-effect-range-damage/>

https://www.researchgate.net/publication/267285340_Reintroduced_species_as_vectors_for_seed_dispersal

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2781800>

https://www.researchgate.net/publication/223716446_Endozoochory_by_free-ranging_large_herbivores_Ecological_correlates_and_perspectives_for_restoration

<https://exmoor4all.com/news/>

https://www.researchgate.net/publication/223007520_Horse_dung_germinable_seed_content_in_relation_to_plant_species_abundance...

https://esc.rutgers.edu/fact_sheet/horses-and-manure/

<https://wildequus.org/2015/07/29/namibia-desert-horses-we/>

<https://www.cbc.ca/news/canada/edmonton/fort-mcmurray-wildfire...>

<https://www.horsetalk.co.nz/2018/01/08/fire-grazing-wild-horses-better-cattle/>

<http://advances.sciencemag.org/content/1/4/e1400103.full/>

<https://www.horsetalk.co.nz/2017/11/20/wild-horse-wildfire-wildlife-ecological-imbalance/>

https://www.researchgate.net/publication/270167386_Combustion_of_Cattle_Fecal_Pats_Ignited_by_Prescribed_Fire

<http://www.myoutdoorbuddy.com/article/133925/what-is-the-value-of-an-american-wild-horse?.php>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4503665/figure/pone.0132359.g005>

https://www.researchgate.net/publication/281822984_A_Geographic_Assessment_of_the_Global_Scope_for_Rewilding_with_Wild_Living_Horses_Equus_ferus

<http://www.pleistocenepark.ru/en/>

<https://awionline.org/content/wild-horses-native-north-american-wildlife>

<https://www.livescience.com/9589-surprising-history-america-wild-horses.html>

Finally I would like to remind you that 2,500 is the number of individual equids that is recommended by the world's equid experts for the long-term genetic viability for a wild equid population such as the wild horses in their natural habitat. The reference for this is: Duncan, P. 1992. Zebras, Asses and Horses: An Action Plan for the Conservation of Wild Equids. IUCN SSC Equid Specialist Group. Gland, Switzerland. – And if there ever were a place for such a truly viable wild horse population to establish itself with evolutionary, ecological & legal justifications, it would be right here in Wyoming & in the very planning area under consideration in this draft E.A. & E.I.S.

Please redo this E.A. & E.I.S. to increase the numbers of wild horses & forage, water, shelter & space allocations while concomitantly decreasing livestock & other overly conflicting, too often bullying interests. This would be the right & noble course of action & best in the long run for all concerned, including us humans.

I would appreciate receiving your thoughtful and fair consideration of the points I have raised. Good luck in achieving a truly fair and just plan for these very important wild horses and the adequate long-term-viable habitat within these four HMAs that the most certainly deserve.

Sincerely,

Craig C. Downer
Wild Horse and Burro Fund
P.O. Box 456
Minden, NV 89423
ccdowner@aol.com

Cc: various interested parties