

Stone Cabin Gather Proposal  
Craigs Comments and Input  
1/12/07

January 12th, 2007

Bureau of Land Management, Tonopah Field Station  
P.O. Box 911, Tonopah, NV 89049  
Attn: Andrea Felton, Wild Horse and Burro Specialist (Comments due 4:30 PM 1/16/07)  
Tel. (775) 482-7800 (main off) Felton: 482-7847; Fax (775) 482-7810; [Andrea\\_Felton@blm.gov](mailto:Andrea_Felton@blm.gov)  
Re: Stone Cabin Complex Wild Horse Gather Environmental Assessment NV065-EA07-028

Dear Ms. Felton:

I have just thoroughly reviewed your Environmental Assessment that purports to justify the drastic reduction of wild horses within the Stone Cabin Complex of herd management areas. I am taking the present opportunity to strongly protest this very unfair treatment of the wild horses and the sizeable public interest in their welfare and preservation in the wild. It becomes apparent early on in the document that you and your colleagues are setting the wild horses up for reduction to a very small population level by blaming them for ecological problems that are not their fault. I note a frequent lumping of wild horses with livestock when describing ecological problems and then your going on to paint a very rosy picture of how great the situation will be when the wild horse herd is gutted by the drastic roundup. No where do you give the relative proportions of livestock, big game species and wild horses within the areas in question. I have been able to obtain some figures on this, however, and am appalled by the extremely disproportional share of resources that is allocated for the wild horses here in their legal herd areas where they are by law the "principal" presence! I urge you to redo this entire anti-wild horse document and to issue a much fairer allocation providing for higher numbers of wild horses within their vast legal herd area. It is plain to me that you and your agency are aiming to squeeze the wild horses off their legal herd area contrary to the law in order to allow a practical monopolization by livestock mainly and also by big game animals at the urging of local ranchers and their organizations and at the urging of the Nevada Dept. of Wildlife, both traditional enemies of the wild horses. Your job is to defend the wild horses' rights upon the public lands, but you are abrogating your responsibility here!

Below please find my specific comments with reference to page number:

P. 1: Your opening paragraph starts out leveling blame on the wild horses and describing them as a negative element in the ecosystem. You arbitrarily state that there is a current overpopulation of wild horses while giving no true perspective or definition of overpopulation, no relative proportions of livestock, big game animals and wild horses, no accounting of human caused abuse to the ecosystem, which includes overgrazing of livestock, overemphasis on promoting big game, target animals by NDOW, elimination of predators, ORV' abuses of the land, mining abuses of the land, tampering with natural springs and livestock and camper trampling thereof, etc. It is very apparent to me that you are laying the groundwork for undermining the wild horses's presence here, while overlooking the true culprits when it come to ecological deterioration!

P. 3. Here you fail to report the proportions of livestock and big game relative to wild horses in their legal herd area of the wild horses. This should logically be done to give perspective, something your document glaringly lacks! The Appropriate Management Level of 547 wild horses in a combined area of 1,227,000 acres (itself a reduction from the much bigger original legal herd areas) yields 2,243 acres per wild horse. This is very unfair and is contrary to the Wild Free-Roaming Horse and Burro Act, P.L. 92-195, that states that the wild horses/ burros shall be treated as the "principal" presence within their legal herd areas. Rather you are treating livestock primarily as the principal presence, and after livestock: target game animals. Within the Stone Cabin Complex including the HMA's of Stone Cabin, Reveille, Saulsbury and Monitor Wild Horse Territory on USFS lands, there is allocated 44,282 Animal Unit Months, while the wild horses here are only allocated 6,564 AUM's, or only about one-seventh of the forage given livestock. When both the Fish Creek and the Stone Cabin Complexes of HMA's are considered, a total of 2,027,945 acres of HMA's is present upon which only 540 horses will remain. This yields 3,755 acres per wild

horses – hardly a fair proportion considering these areas are part of that minor portion of the public lands where the wild horses are supposed to be treated as the “principal” presence! Between 2005 and 2006, 1,179 wild horses have just been gathered from the Fish Creek Complex adjacent to the Stone Cabin Complex. The latter used to support well over 2,000 wild horses, but is now planned for reduction to the paltry figure of 181. It is clear that livestock interests are expanding their monopoly at the horses expense and that our public servants are doing nothing to stop this!

P. 4: 138 wh's in Reveille HMA is much too small and the BLM should have appealed this livestock-favoring decision.

1.3: You present no facts, just an arbitrary statement. You fail to differentiate between livestock impact and wild horse impact in attributing blame for ecological deterioration. It is usually the livestock who have caused the damage, not the wild horses. But it is convenient to livestock interests to always blame the wild horses and shirk their own responsibility! You fail to look at the possibility of reducing livestock in this area, but only continue in very suspect manner to heap blame upon the wild horses. This is neither fair nor honest!

P. 5: You need to maintain a larger population of wild horses in order to prevent inbreeding. Gathering below the AML, as you propose, is illegal! Your statements concerning overutilization are arbitrary and tendentious. You present no facts, no perspective. The public is not able to judge the relative proportion of herbivore classes: livestock, deer, horses.

P. 7: Concerning those commenting on the plan, only a few of the traditionally conforming commenters are mentioned. You fail to mention many other wild horse supporting groups and individuals who oppose the excessive roundups and unfairly low AML's that have been decided upon by our supposed public servants in the BLM and USFS. The ranchers who commented are clearly blaming wild horses for range deterioration that they and their livestock are largely responsible for! ... Movements of the wild horses relates to their semi-nomadic life style and is a way of their dispersing their grazing pressure and allowing a natural rest rotation. For this reason fences should be eliminated within their herd areas wherever possible. ... Concerning possibility of accidents along U.S. Hwy 6, you should urge the Nevada Dept. of Transportation to install Strieter Lite reflectors along the highway. These would prevent collisions at night between the wild horses and other wildlife and vehicles. See [www.strieter-lite.com](http://www.strieter-lite.com) and call Lauren & Julie Keller at 775-241-0535.

2. Description of Prop. Act. & Alt's: You make it all sound so very rosy, like eliminating wild horses is the very best thing anyone can do. How very unfair and lacking in basic honesty!

P. 8: Proposed gathering to 88 wh's is much too low for Reveille! Saulsbury: Gathering below AML here to 25 (40 is AML). This jeopardizes the herd. Even the AML is non-viable. What is the proportion of livestock here? Big game animals? Stone Cabin HMA: Gathering to leave only 181 wh's in such a vast area is much too low. Leaving 60% stallions in a harem species will create an unwholesome situation in which much friction among the males will ensue.

P. 9-10: I favor the No Action Alternative (No wild horse gather). Having 821 wild horses in the Stone Cabin Complex in Jan 2007 is not excessive and may just be a minimally viable population. Remember there are 1,227,000 legal hma acres for the wild horses here. This yields 1,495 acres per wild horses, hardly an overcrowded or excessive population, especially considering these areas are to be managed principally for the wild horses, not the livestock, according to the law! Your reduction of the complex to a mere 300 wild horses will work out to 4,090 acres per wild horse, which leads me to ask: is this not a mere token number for the wild horses in these their legal areas where they have the right to exist? What interests are displacing them here? The local livestock operators? The big game hunters? The ones the federal govt. is supposed to defend the wild horses against?

P. 11: I oppose PZP immunocontraceptive fertility control. This will negatively affect the wh herd's vitality.

P. 13: Air Quality: The dust stirred up by the helicopters during the roundups causes a serious risk of causing dust pneumonia in the wild horses rounded up. Env. Justice: I disagree: wild horse supporters and observers are being seriously discriminated against by the proposed action!

P. 15: 3.2: I note there are five livestock grazing allotments within the Stone Cabin Complex HMA's. This is clearly the problem! The wild horses are being squeezed out by the ranchers even in their own legal herd areas! The fences you note as here constructed interfere with the freedom of movement of the wild horses, so essential to their survival and to their equitable proportioning of consumption patterns in this desert area. This may cause them serious survival problems if interfering with seasonal migrations, i.e. Winter kill, prohibition of water in Summer.

P. 16: The vacant Monitor and Ralston grazing allotments should be left vacant to provide for more wild horses here within their legal herd areas.

Table 5: Clearly this reveals that livestock, not wild horses, are the principal presence being catered to by BLM even in their legal herd areas, contrary to the original intent of Wild Horse Act!

P. 17: Top: Ok, here BLM admits that by removing wild horses to substandard levels it is catering to livestock interests by providing more feed for cattle. The solution here called for is to reduce livestock to allow more wild horses in their legal herd areas. Bottom: You overlook the wild horses role as seed dispersers (through feces) of many native plants and as builders of soil.

P. 18: No Action Alternative: You overlook the important role of wild horses in dispersing native seeds of many species through their feces, thus helping the ecosystem. Many other positive ecological mutualisms you overlook when considering the importance of the wild horses.

3.4: Lumping wild horses with livestock is a typical maneuver by wild horse enemies, who always blame the wild horses and minimize or ignore the negative impacts of their livestock, for obvious reasons. ... You again lump wild horses and livestock in assigning responsibility for deteriorating vegetation. Look at the relative numbers and grazing pressures above alluded to! How much have livestock been adjusted? Your arbitrary judgement that wild horses are "overpopulated" is your excuse to cripple the wild horses populations here, while promoting the further livestock monopoly on these public lands! Bottom Paragraph: You fail to recognize the horses with their post-gastric digestive system as better able to derive sustenance from high fiber, relatively nutrient poor forage which they pass in greater bulk as compared to ruminant grazers such as cattle. You also overlook the role of this in helping to build the humus content of the soil.

P. 19: No Action: You state these negatives against wild horses but present no factual proofs. These are just convenient to your agenda of wild horse minimization even within their legal area.

3.5: Do not lump wild horses with livestock and recreational use. This is unfair and leads to guilt by association, not a very scientific or honest approach, since prejudiced views creep in.

P. 20: Top: Are you sure it is wild horses causing riparian degradation, not livestock or recreational use? Middle. You fail to discuss the relative proportions of grazers in the herd area, i.e. what is the relative proportion of wild horses to livestock present? To big game? This causes me to suspect that you are targeting the wild horses. Bottom: Wild horses have much less tendency to congregate around riparian areas than do cattle. They disperse their grazing pressure over a wide area. No Action: This is an unfair statement which blames wild horses for degradation caused by other factors, especially livestock. Very unfair!

P. 21: 3.6: Please give the relative proportions of livestock and big game animals within all of the wild horse herd areas here and describe the amount of acreage in the original herd areas, relative to present hma's. ... Are these factual and well analyzed, weighed statements or just convenient to your targeting of wild horses for drastic reduction?

Bottom: The Wild Horse Act protects the free-roaming lifestyle of the wild horses and burros. This is ecologically healthy, allowing them to disperse their grazing pressure and rest rotate vegetation within their home ranges. Bottom. 403,000 acres in Stone Cabin is a lot of legal acres for the wild horses! This is chiefly for the horses not for livestock! Please remove the fence which is proving fatal to horses during winter snows, as you admit.

P. 22: Top: Fooling with hormones of wild horses is very dangerous and can very adversely affect their well being! ... Did test horses suffer and die? Middle: Sounds like an excuse for practically eliminating the wild horses: only 50 to remain post gather in an HMA that is 403,000 acres in size. this works out to over 8,000 acres per wild horse. This is outrageously unfair! The other HMA's also receive very unfair treatment in numbers of horses to remain. This is contrary to the law.

P. 23: Top: The median of this AML works out to 104,000 divided by 155 = 671 acres per wild horse. Such a sized area could support at least 3 times as many wild horses. What interest is monopolizing the legal wild horse herd areas here? Livestock? Big game? Both? Middle: The unique Stone Cabin Grey deserves higher numbers to preserve truly viable population.

P. 24: Top: 1,000 is unfairly low for such a vast legal herd area. This population should be much greater to assure long-term viability. Again what are the relative proportions of livestock and big game within the legal wild horse herd areas? Midpage: It would seem that in a species with a harem social structure such as the horse, there would naturally be more females than males in the population. An inordinate number of males could cause serious social problems, increased violence among the stallions vying for the relatively few females. ... Only 25 wh's to be left in Saulsbury HMA. This works out to 15 below AML of 40 in 135,000 acres in HMA which divided by 25 works out to 5,400 acres per wild horse. This is an outrageous treatment of wh's within their legal herd area where they are to be considered the "principal" presence! ... Why is Reveille HMA so low in wh #? This could be a strong indication of illegal wh killings and removals, fencing off of waters, etc. ... In Stone Cabin HMA, wh number to be released is 170 in an area of 403,000 acres in size. This figure div. by 170 = 2,371 acres per wild horse left. This again shows how outrageously unfair you are treating the wild horses in their own legal area! ... Bottom: Re: injuries assoc. with wh gather: This is a gross underestimation of the extreme trauma, shock, injury and suffering these brutal helicopter roundups cause to the wild horses! There is a better way of in-field management that could obviate these cruel roundups by allowing the population to self-stabilize through use of natural barriers and actually allowing them to fill their niche and assume principal status within their legal ha's. ... I disagree concerning the reduction of population having "minimal" impact on herd dynamics and age structure. This has a big impact and there is a better way.

P. 25: Top: You overlook how these excessive roundups set back the natural adaptation of the herds in their particular ecosystem here, as reflected in special behaviors, phenotypes, genotypes, migration patterns, knowledge of food, water, shelter, etc. These roundups are disruptive and impede the wild horse population's tendency to fill its niche and stabilize its population. Midpage: That the mosaic of herd territories that itself stabilizes the population is overlooked by you. 540 wh's left after 2005 roundup in such a vast area should be left alone. This is a tiny number relative to the enormous amount of area these wh's occupy! Bottom: All sounds very rosy, but in fact the wild horses are not to blame for deteriorating conditions, rather other users are: notably livestock. Your plan allows livestock and big game to monopolize the legal wild horse herd areas here. This is contrary to the law – very unfair to the wild horses.

P. 26: Table 6: I favor the No Action, No Gather Alternative. 882 is a fair number of wh's for such a vast area. 403,000 div. by 882 = 457 acres per wild horse. This habitat area can easily sustain a herd of 882. This would be closer to a long-term viable level, of which there are hardly any left in the U.S. Also intrinsic "density-dependent" population limiting abilities would come increasingly into play as wh's fill their niche here. Bottom: Higher % of males would cause increased fighting among males and abuse to mares.

P. 27: Top. Such drastic roundups will cause Compensative Reproduction, a surge in births as occurred in Reveille after the roundup. Therefore it would be better to leave more wh's in the area and let the population fill its niche here and intrinsically stabilize its numbers with a mosaic of wild horse band territories naturally limiting the population. Why don't you let this work?

P. 28: Sometimes gelded stallions are harassed by normal stallions, kicked, bitten and driven off and can even be killed. Do you have information on such incidence?

P. 29: Yes, I favor #4: No Action Alternative. It is much more fair and should be accomplished in a sound manner by reduction of livestock and big game within the legal wild horse herd area.

2nd Paragraph: This is hyperbole convenient to your proposal to gut the wild horse herd. You overlook the alternative of reducing livestock and big game to give the wild horses their proper share of resources here and allow a more truly long-term viable population level to become established. 3rd Para: This is a cave in to livestock, and big game, permitting their monopolization of the public lands. This is an abandonment of the wild horses' rights. Bottom: These arguments are so very convenient to your objective, which is to gut the wild horse herd here, to reduce it to a mere token level and to accommodate livestock and big game interests. This is a shameless abandonment of the true spirit and intent of the Wild Horse Act that provides for healthy, viable populations of free-roaming wild horses in their legal herd areas!

P. 30: Given Global Warming and increasing pressure from more people on public lands, the stochasticity factor tends to the extremes and argues for leaving a greater population number of wild horses, rather than the mere token levels you are proposing. Such a small level as 300 wh's would be much more subject to chance die out due to vagaries of climate, illegal killing (currently on the increase), human tampering with water sources, disturbances with ORV's, etc.

P. 31: The No Action Alternative, #4, produces reasonable population numbers for such vast areas of legal herd area. Table 7: What you should do is let the wild horse population fill its niche within its legal herd area and stabilize through intrinsic controls, including those self imposed and the construction of barriers along natural boundaries so the herd would be self contained. The roundups would become a thing of the past. This reveals to me that something else is going on here, i.e. an effort to displace wild horses from their own legal herd areas and supplant them with other interests, especially livestock, big game, etc. Please note that the Stone Cabin Complex has 1,227,000 legal acres for wild horses. At the median projected population for year 2011, this would be occupied by 1,458 wild horses. This would work out to 842 acres per wild horse, which is not an overpopulation – far from it!

P. 32: 1st Paragraph: You choose a scenario convenient to your agenda of reducing the wild horse population to mere token levels! Your talk of wild horses destroying the ecosystem is hyperbole and overlooks the real culprits here: overgrazing by ranchers and their livestock, especially. 3rd Para: I notice that you select the extreme high in the projected figures. You should use the median figure in your discussion. This shows your tendentiousness. Your projection of degradation of rangeland is wrong since this area could and should sustain a level well over 1,000 wh's and the other grazers, i.e. livestock and big game, should be adjusted to permit this.

P. 33: Wildlife: You fail to recognize that the wild horse has a positive influence on the native ecosystem though seed dispersal and soil building by means of its feces, breaking ice in winter that permits other species to access food and water, pawing to water in summer to permit other species to drink, and in many other ways by which it restores the ancient and long standing equid component of the ecosystem in Western North America.

P. 34: I note the importance of Pinyon- Juniper forests to the Bald Eagle and to the Ferruginous hawk, as to many other species, yet these forests are often chained to promote livestock.

P. 35: Are you sure the Greater Sage Grouse is being impacted by wild horses and not livestock? Take care not to blame wild horses for abuse to habitat caused by livestock! I would like to see the factual proofs of your claims here. Env. Consequences: What about effects on wildlife species that benefit from wild horse presence – of which there are many? Bottom: Here you ignore wild horses' positive effects on many native wildlife species (See enclosed article).

P. 36: Top: Your merely saying so doesn't make it so! End 1st para: You should reduce livestock not wild horses and you should stop blaming wild horses for ecological destruction caused by ranchers, ORV'ers, overemphasis on big game target animals, the elimination of natural predators to favor livestock and game – all in the ultimate analysis caused by modern man!

No Action: Here you project such a dire consequence of letting wild horses fill their niche and stabilize,

but overlook the real problems, i.e. to many livestock whose relative proportions to wild horses you conveniently omit from this otherwise lengthy EA that keeps repeating itself! Same goes for big game in relation to wild horses.

P. 37: Top: Yes, the wild horse is a wildlife species not a domesticated one, especially when it returns to living as it has over the vast majority of its presence on Earth. .... Dense juniper provides good shelter for wild horses. ... Chukar is an introduced game species from the Old World but is promoted by the hunting establishment. I see no complaints about its presence from the establishment, yet the same will often viciously attack the returned native wild horse as a “destructive exotic”. How unjust and bias!  
Kawich WSA: Note: a large population of mule deer in Kawich indicates a possible underlying reason for wanting to reduce the wild horse population to such a crippling low level. Bottom: Wild horses enhance wilderness values. Indeed, they restore an age-old ecological component to the North American ecosystem that itself was depauperated of its large mammals during the Pleistocene age (See enclosed article).

P. 38: 2nd Para: I object: it is unfair to establish a horse free area. You portray the wild horse as a negative rather than a positive. this is wrong. You omit its many positive contributions to the native wilderness ecosystem, its mutualisms as a prey species for mtn. lions, as a seed disperser for native plants, as a soil builder through its feces, etc. Clearly you are grinding an axe against the wild horses. ...  
No Action: This is an unproven and fatuous statement, convenient to your purpose of minimizing wild horse presence within their own legal areas! I protest!

P. 39: Table 8: Provision is made for game birds. This same effort to accommodate higher, more viable numbers of wild horses is not being done by BLM! Bottom, Cultural/Historical: Unfair to lump livestock with wild horses for assignment of blame. They should be treated separately! This is a convenient way of targeting wild horses for practical elimination while the real culprits continue their abuses. This is disgraceful!

P. 40: 4.2.2: Again you are lumping wh's w/ livestock. This is very unfair! ... No! High numbers of livestock have caused deterioration of rangeland! This shows your prejudice. ... You equate wild horse reduction with ecological improvement, casting the wild horses in a negative light. This is grossly unfair! ... Again prejudice view in next to last para. ... Livestock should be reduced here to allow for a truly long-term viable wild horse population!

P. 41: 4.2.3: Unfair to lump wild horses and burros with livestock, gives a misleading conclusion and attribution of blame. 3rd para: You overlook seed dispersal by wild horses, building of soils. Last para: This is a gross oversimplification and very misleading and unfair!

4.2.4: Livestock, esp. cattle, camp on riparian areas. Wild horses use them briefly, then trail off to graze over the drier areas, and do not camp on riparian like cattle. You fail to recognize the scientifically proven facts!

P. 42: Top: “Excessive” numbers are arbitrarily defined to support your agenda of wild horse minimization and to maximize livestock and big game even in the wild horses's legal herd areas. This is grossly unfair! ... AML should be increased with proper monitoring. ... You should use Strieter Lite Reflectors to prevent horse and wildlife collisions with automobiles. These are being used in other parts of Nevada, U.S., and world. Call Lauren and Julie Keller at 775-241-0535 and [www.strieter-lite.com](http://www.strieter-lite.com) .... You admit possible genetic inadequacy due to low population numbers to which you are bringing wild horses in the Stone Cabin Complex. Bottom Para: Wrong to assign blame on wild horses when the degradation has been caused by people, though innocent livestock, ORV's, etc. ... This is another rosy statement overlooking detriment of your excessive roundup to the wild horses population, which is being taken to a non-viable level to favor livestock primarily!

P. 43: Top: This is hyperbole! BLM could implement in-field mgmt strategy that would allow wh's to intrinsically stabilize their population numbers without recourse to the cruel and drastic helicopter roundups. You give no fair consideration to this very feasible alternative.

4.2.6 Wildlife: Again you overlook wh's benefit to other wldf species and portray them entirely as a

negative. This is grossly unfair! Bottom: Grossly unfair to state simply “Wild horses and livestock utilize the same natural resource as wildlife”. In the first place you are lumping the two and in the second place it depends on which wildlife. This is a gross oversimplification and blanketing statement. You also ignore now many species of wildlife benefit from the wild horse presence. Bottom: Another rosy scenario convenient to your targeting of wh’s. You are wrong when you project an extremely destructive scenario under No Action. Wild horse would reach a truly viable level and though a proper non-intrusive management strategy could stabilize their population. This is a very unfair and unjust statement and very far from the truth!

P. 44: 4.2.7: Again very unfair to lump wh’s w/ livestock in attributing of blame for riparian degradation. You must separate the two! What about livestock numbers and their destructive impact? This is the real problem, not wh’s!

4.3: Here you reveal your real agenda: livestock and hunting maximization even within this legal wild horse herd area & at the direct expense of the wild horses. This is grossly unfair!

P. 45: A lot of words all repeating the same preconceived and lopsided justification for wild horse minimization! Very wrong! ... When you mention “additive future effects of livestock grazing”, here you reveal your real agenda of livestock maximization even here within the wild horses’s legal herd areas! This is very devious and wrong!

5. Suggested Monitoring: Separate your analysis of the different species, please!

Stone Cabin Complex Interested Party List: Please place me on this list. I notice this list is heavily weighed in favor of wild horse enemies, e.g. ranchers and game managers, etc.

Thank you for your careful consideration of my comments and please do not follow through with the proposed action as this is grossly unfair to the wild horses in the wild that have a legal right to be here in these herd areas. They contribute so much to the quality of life here in Nevada, my native state. Please let me know how I can help facilitate a fairer treatment of and provision for the wild horses in the wild of the Stone Cabin Complex as elsewhere in your jurisdiction.

Sincerely,

Craig C. Downer  
P.O. Box 456  
Minden, NV 89423; [ccdowner@yahoo.com](mailto:ccdowner@yahoo.com)  
Enclosure: article