

Wilson Creek Complex EA  
Craigs Input 1/24/07

January 24, 2007

Bureau of Land Management, Ely District Office  
HC 33 Box 33500,  
Ely, NV 89301-9408

Attn: District Manager, & Wild Horse Specialists: Jared Bybee & Ben Noyes

RE: Wilson Creek Complex: Wild Horse Gather Plan and Preliminary Environmental Assessment, Ely No. NV-040-06-047

Dear Sirs:

Thank you for sending the above document. Unfortunately your proposal would perpetrate a terrible injustice against the wild horses in their legal herd areas and I urge you to redo the proposal or to adopt the No Action alternative. Do you really mean to tell me that the current population of 900 wild horses is an overpopulation in legal Herd Management Areas (HMAs) of 796,932 acres? This works out to about 900 acres per wild horse at present – hardly an overcrowded or overpopulated situation, provided that the wild horses can enjoy their fair share of the water, forage, shelter, and other habitat resources here within their legal herd areas. Yet you remain silent on the crucial point of the other utilizers of resources within the wild horses' legal herd areas, which would be in this case especially the domestic livestock, cattle and sheep, run on the public lands during certain months of the year to grow up and be readied for their final fateful trip to the fattening pens that precedes their voyage into the great beyond. Their relative proportions translated into forage usage AUM's within the legal herd areas of the wild horses, in this case Wilson Creek HMA containing 687,215 acres and Deer Lodge Canyon HMA containing 109,717 acres, should be clearly spelled out in order to give the public a much needed perspective here. The Appropriate Management Levels for the above two HMA's, already considerably reduced from their original 1971 legal Herd Areas (HA's) – though you do not specify by how much or even that this already happened, short changing the mustangs – are (1) "not to exceed 160" for Wilson Creek HMA, which at most works out to 4,295 acres per individual wild horse and (2) 30-50 for Deer Lodge Canyon HMA, which works out at between 3,657 & 2,194 acres per horse.

Something is clearly wrong with these very lopsided allocations for wild horses within their vast legal herd areas; and I take this opportunity to strongly protest this gross injustice both to the wild horses in the wild and the sizeable public who both appreciates and supports them in their free and natural state! It is apparent to me that one local public lands rancher receives more consideration from BLM than literally hundreds of thousands of U.S. citizens who want to see the wild horses treated fairly and enjoying the use of their fair share of the resources within their own legal areas as established under P.L. 92-195, the Wild Free-Roaming Horse and Burro Act.

For the above and following reasons, I am asking you to redo the Wilson Creek Complex Wild Horse Capture Plan and Preliminary E.A., so as to provide for a much greater number of wild horses, one that truly fits their vast legal herd area here. As our nation's public servants, you are bound to uphold all the laws of the land and to treat fairly all the values, uses, interests, and presences in an equitable fashion, not siding with certain vested interests such as livestock and game hunting who greedily want to monopolize the public lands and to possess their resources for their own narrow-minded ends. You should leave the ca. 900 wild horses in this area and work at securing adequate habitat requirements for at least this small number, small for such a vast area. Then you should work at so managing the wild horse herd areas by judicious use of natural and, where necessary, artificial barriers, so as to allow the wild horse population here to self stabilize in balance with available resources. As a "climax" species, the wild horse is capable of this, given density dependent controls which come increasingly into play as their ecological niche is filled. Then the true intent of the Wild Horse Act would be more truly realized and the returned North American native wild horses would prove themselves to be positive restorers and enhancers of the native N. Am. ecosystem rather than the misfits that their detractors like to portray them as. The latter scapegoat them for ecological abuses that mankind has caused, rather than come clean and own up to their responsibilities and change their ways so as to allow a fairer proportion of all species

upon the land, including the returned native horses living as God throughout all vast evolutionary time intended and – it is my most fervent belief – still intends!

The following are specific comments with page references:

P. 2: Wild Horse Gather Plan slated for Febr., 2007 – right away! Too precipitous! ... Fertility control could be applied to returned mares – I object! This is really setting the population up for die out! ... Outrageously low AML's (Appropriate Management Levels) for such vast legal areas! ... Please exposit relative proportions in terms of resource use by livestock, big game & wild horse herbivores as occurs within the legal herd areas and hma's of the wild horses and give the size and a precise map of the original 1971 and still legal wild horse Herd Areas.

P. 3: Thanks you for the map, though I would prefer a larger one. Details are too fine.

P. 4: Top: Livestock are clearly monopolizing the wild horses' legal areas. This is illegal – contrary to the law! ... A. Need for Proposed Action: To say wild horses are “overpopulated” is false! Cattle and big game are being favored over wild horses in spite of the Wild Horse Act's stipulation that wild horses shall be the “principal” presence managed for within their legal herd areas. This is far from being the case!

P. 5: top: BLM is caving into local and state game hunter interests. ... The quotation from the Wild Horse Act concerning overpopulation is wrongly applied, since there is no proven overpopulation of wild horses within their vast legal area of the Wilson Creek Complex. It's just that people in authority are allocating the resources to which wild horses are entitled to livestock and big game contrary to the law.

Bottom: Proposed Action: BLM to capture 775 wild horses leaving 125. How is the wild horse-interested public assured that even this very low 125 will not become a mere paper figure, and that even fewer will actually be left? ... A certain small portion of the horses will be released, particularly ages 6-15 years, and over 16 years. The released mares will be injected with PZP experimental fertility control drug. This is really undermining the wild horses' “thriving natural state” though you make it sound like it is all the opposite – and I strongly object. ...Spanish Barb types will be released. Again artificial selection taking precedence over natural selection.

P. 6: 125-190 wild horses would remain in the Wilson Creek WH HMA's Complex after the roundup. This works out to between 6,375 and 4,194 acres per wild horse! This is an outrageously lopsided treatment of the wild horses here in their legal HMA's – and this is on top of BLM's already having considerably reduced the original wild horse HA's to HMA's. I strenuously object to this gather plan and its spurious justification in the EA! It is clear you are reducing the wild horses to mere token levels and ones that are non-viable. This is a great injustice!

P. 7: Top: 20% increase seems exaggerated. But when you fail to allow the wild horse population to fill its niche in its legal herd area, then naturally it keeps trying to do so rather than reaching a steady state equilibrium in which the population is intrinsically stabilized.

... Bottom: Re: Environmental Justice: Your proposal is very unjust to that portion of the U.S. citizenry who appreciate the wild horses in the wild!

P. 8: Wild Horses: This is a very rosy statement of yours! How can you characterize this cruel and draconian jerking of the wild horse, young and old, pregnant and non, out of their natural homes and reducing them to such a small population as “increasing herd health”?!

P. 10: 3rd paragraph: The helicopter roundups are very stressful for the wild horses who are greatly traumatized. Many experience injuries; and a considerable percentage die from these and from decline due to depression, disease transmission, etc., in the unnaturally overcrowded and manipulated holding pens. In fact, many of the captured wild horses are now going to slaughter under the Burn's Amendment. This is not a pretty thing you are doing to the beautiful wild horses! For this reason, you should opt for a much better alternative of non-manipulative field management where all the wild horses would be born, live out their lives, and die within their legal areas and in balanced, contributing fashion as concerns the diverse Western ecosystem where they play a very positive and beneficial ecological role if so allowed by us people!

P. 11: I favor the No Action Alternative. 900 wild horses is a nearly long-term viable population! Leave it alone and let the herd stabilize within its legal herd area, provided with barriers and ALL the natural habitat requirements of water, forage, shelter, elevational migration routes, etc., that it requires to survive in the long-term in this beautiful Great Basin desert area.

... You are issuing misleading statements about the dire consequences of leaving the wild horses alone. These, of course, seek to justify your very unjust treatment of the wild horses within their own legal herd areas.

P. 14: Here again you continue with your trumped up charges against the wild horses in order to achieve

the vested interest establishment's goal for the practical elimination of the wild horses from their legal herd areas. It appears you masters should be very pleased!

P. 17: Affected Environment: The livestock operators should be reduced as to their number of livestock and amount of forage, water, etc., these consume. But you are helping them monopolize the wild horses' legal herd areas and even HMA's, and, thus, you are abrogating your responsibility to the wild horses in the wild and the considerable public who support them there.

P. 18: No Action Alternative: This is hyperbole – an exaggerated or misleading statement that strays far from a wise, just and factual overview of the situation. Obviously your tendentious statement is aimed at wild horse removal and displacement with livestock and big game, i.e. wild horse minimization.

P. 20: I notice much attention to livestock and game interests, including guzzler construction and very little for the wild horses, who are treated as misfits even within their own legal herd areas where they continue to be maligned and scapegoated according to the longstanding rancher tradition, much as the naturally living Indian, wolf, puma, bear and other races and species were! Do we ever learn this is not right and that we can change – it is possible – for the better?!

P. 21: Present Actions: Leave the 900 wild horses alone and free! This figure equates to ca. 900 acres per horse in their legal HMA's. This is not an overpopulation! ... Bottom: Wild horses are also a Returned Native Species in North America (See enclosed article).

P. 26: Fertility Control: Concerning the 12 gauge or 1.5" barbless steel needle injected by jab stick – there is much possibility of the wild horses receiving serious injury here.

P. 33 ff: Your discussion of Population Modeling is very superficial, as you do not consider the many alternative possibilities for activating the wild horses' own innate ability to stabilize their own population numbers through density dependent behaviors and the use of natural and, where necessary, artificial barriers to prevent their coming into harm's way. Of course, this would involve your really dedicating the legal wild horse herd areas to the wild horses in the wild rather than to livestock and game animals and other exploitative interests as you are presently doing. But this is what you clearly should be doing here!

P. 30: Nearly 800,000 acres of HMA's in this complex and no doubt much more in the original 1971 legal HA's in this region (What is this figure please and can you provide a map of original 1971 HA's here?) could easily sustain a few thousand wild horses on a year-round basis. This would be a truly long-term viable population that could become specially ecologically adapted to this region, rather than just the "minimum viable population" that is a euphemism for wild horse minimization and whose justification is usually full of scientific holes. Yes, this area could sustain a few thousand wild horses without ecological degradation, provided the BLM followed the law and treated them as the legally and morally entitled "principal" presences here. Instead, however, the BLM is setting the wild horses up for inbreeding and chance die out by reducing them to non-viable population numbers that will be unable to withstand the vagaries of weather, disease, predator killings, illegal killings by people– now on the increase – etc.

Enclosed please find a recently published article of mine on the subject of wild horses in the wild, their evolution and ecology, etc. Thank you again for listening to my views and please let me know what I can do to restore the wild horses in the wild in the vast Wilson Creek Complex, as well as of your final decision.

Sincerely,

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