Americas Mustangs & Burros

What's Left, The High Costs of Miscalculating And Will They Survive? By C.R. MacDonald July 2008



Summary

On June 30th, 2008, the Bureau of Land Management (BLM) announced the Wild Horse and Burro Program had reached a crisis point of epic proportions. As a result of removing over 75,000 wild horses and burros from public lands since 2001, BLM now claims the cost of holding 32,000 warehoused animals has exceeded the programs financial limits and something must be done.

According to BLM, only three viable options now exist::

- Allow BLM to grant Instant Title to adopters, which is almost a guaranteed slaughterhouse end.
- Allow BLM to shoot tens of thousands of wild horses both on and off the range.
- Give BLM more money to manage the Wild Horse and Burro Program.

While BLM is attempting to focus the public's attention on "what" should be done about BLMs reported crisis of "excess" wild horses and burros, the first question the public should really be asking is, does BLMs data back up their claims?

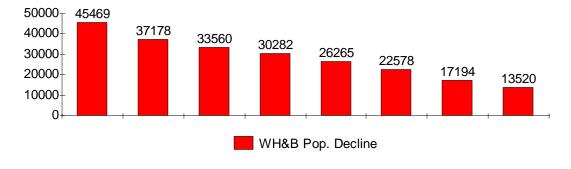
Despite the massive cleansing campaign over the last several years, BLM continues to report 33,000 wild horses and burros still roam public lands. However, independent analysis utilizing BLMs own statistics and methods of annual population reports, removals and reproductive rates concluded the most likely wild populations still remaining is merely 13,500 wild horses and burros - 20,000 less than BLM reported.

Three different ratios were examined and applied to pre-foaling and post-foaling population levels based on BLMs reported annual removals, which included a 50/50%, 40/60% and a 30/70% application. In all three models, populations never exceeded 17,000 wild horses and burros as of BLMs February 28, 2008 reporting date.

BLMs own data fails to support their population claims by a large margin and evidence strongly suggests the agency has removed 11,000-14,000 more wild horses and burros than was necessary. In other words, BLMs own statistics point to the conclusion that the current "crisis" has been manufactured.

National WH&B Populations-50/50% Ratio

Fiscal Year 2001-2008 as of 2/28



Facing increasing public scrutiny, BLM is now implying their aerial census techniques may be to blame for the highly inaccurate population reports. Is BLM now claiming the in depth monitoring of forage consumed by wild horses and burros which justified these removals actually reflected populations twice as large as BLM knew about? If so, what does this say for the validity of their established population targets?

In addition to the startling results of actual population declines, analyzing a variety of BLMs management techniques such how wild horse and burro population goals were established, reducing wild populations to unsustainable levels, population modeling parameters, census counts, reproduction rates, fertility control such as PZP injections and their newest "option" of castrating stallions, all indicated that BLMs implementation of these techniques were often less than "honest" and appear to be aimed at permanently crippling or eliminating the majority of free-roaming herds.

Evidence was also found as far back as 2005 that BLM may have been deliberately sabotaging adoptions to keep holding costs high while they continued to take more and more wild horses and burros off the range.

Americas Mustangs & Burros, What's Left, The High Costs of Miscalculating and Will They Survive, is a culmination of two years of research into a variety of BLM proposals, policies, and management, both in the wild horse and burro program as well as other multiple uses of public lands and provides a wide variety of case studies, documents, statistics and data, most taken from BLMs own reports, as well as a brief history of the abuse and malfeasance over the years in the wild horse and burro program, some alleged, some proven, and where we stand today.

Some of its findings include:

- Thirty-eight herds were found with blatant inflated reported populations, some by as much as 500% with twenty-four found just between 2007/2008 alone. Over the last year, BLM reported Warm Springs Canyon skyrocketed from 139 to 607, Diamond Hills South jumped from 20 to 161, Dry Lake went from 75 to 263 and Wilson Creek, last rounded up in February 2007 with BLM reporting only 130 wild horses remained, now mysteriously reports 386 wild horses inhabit the area one year later.
- Conversely, wild herds have also been gutted during round ups such as Nevada's Little Humboldt with a "high" allowable management level of 80, now reporting only 12 wild horses remaining after emergency round ups. Hot Creek saw wild horse populations plunge from 128 to 3 and Oregon's Sand Springs Herd Management Area, which conducted round ups in 2006, now report merely 42 wild horses are there today despite BLMs approved population objective of 200 wild horses.
- Nevada is home to the largest remaining wild horse herds in the West. Since 2004, BLM has cut allowed wild horse and burro populations by 1,458, has an addition 446 more wild horses and 1.6 million acres of habitat proposed for elimination pending approval, converted use for at least 333 wild horses to wild burro use instead, which hid the elimination of the wild horse herds, as well as counting 249 wild horses and burros towards state population objectives where no populations actually exist.

- U.S. Geological Survey/Biological Research Division (USGS/BRD) and BLM initiated a new study using computer models to adjust for uncounted wild horses in Wyoming's largest wild horse herds, the Adobe Town and Salt Wells Creek Herd Management Areas. Between the two agencies, direct counts of wild horses were inflated by as much as 86% and what BLM reported to the public didn't match USGS numbers one time throughout the entire three-year study.
- In 2003, BLM reported a total of 1,947 wild horses were removed during three separate round ups, USGS reported 2,350 were removed in one August round up alone. BLM also reported wild horses were removed in the Miller Flat Herd Management Area in Nevada, though the only record of this occurring was found in a livestock grazing allotment renewal.
- Despite almost 40 years of "management" of the Adobe Town and Salt Wells wild horse herds, USGS found BLM had no data available on separate reproduction or mortality rates. In 1999, BLM estimated 11,000 wild horses roamed this area today only about 1,000 are reported to remain, a 90% loss of the herds in less than 10 years.
- Southern California was once home to the largest wild burro population in the country and at the time of passage of the California Desert Conservation Area Plan in 1980, there were 19 recognized Herd Management Areas (HMAs) that could be managed for burros, 14 were officially designated for that purpose within the Conservation Area alone. The combined allowable management level (AMLs) totaled 2,747 wild burros and their available habitat was 3.5 million acres. Today, this same area has only 2 burro herds left, the Chemehuevi and Chocolate-Mule Mountains HMAs, with only 252 wild burros still allowed on less than 300k acres a loss of over 90% of both habitat and populations.
- Though BLM reports 199 wild horse and burro Herd Management Areas remain nationwide, an analysis of the remaining herds revealed the true count is 165 wild horse herds and 27 wild burro herds.
- On October 10th, 2007, the BLM Director affirmed the decision to zero out Colorado's West Douglas wild horse herds, based on the premise that BLM concluded the range could only support 60 wild horses before resource damage would begin, despite approving heavy livestock grazing in the area. BLM then maintained this population level was too low to be self-sustaining and consequently issued the order to permanently eliminate the West Douglas wild horses. As a result of this decision, an examination was made of the remaining wild herds with allowable management levels issued at 60 or less; sixty-nine of the remaining herds (35.9%) met this criteria.
- Of the remaining wild horse and burro herds BLM has issued an allowable management level of 150 or more wild horses and burros, considered a more genetically stable population less at risk of crashing, 34.5% of the remaining herds met this criteria; 62 wild horse herds and 5 wild burro herds. As of July 2006, BLM has targeted 52 herds for a new management technique to reduce reproduction that will include castrated stallions, known as geldings, to be introduced into the free-roaming herds. The majority of the herds BLM plans to target are the last viable herds left.
- In late June of 2008 BLM issued a decision for the Nevada Wild Horse Range, the oldest and what use to be the largest protected wild horse herd in the country, approving management plans authorizing the complete elimination of the functioning herd and replacing them with a population comprised exclusively of 100% geldings.

- BLM has also approved a variety of surgical techniques and include options such as castrating stallions directly in the field and releasing them within 24-48 hours after surgery. This has raised additional questions of; How does BLM intend to study gelding behavior in a highly restrictive environment such as Nellis Air Force Base? Why did BLM choose such a remote location to approve of this "gelding only" proposal? Is it BLMs intent to transport geldings into a military base with no public access for discreet "disposal", as geldings and stallions are more difficult to adopt?
- In November 2007, a report was released by Valerie James Patton that examined the unusual routine transport of exclusively geldings under a non-slaughter status into Mexico, which began in August 2005, three months after BLM began selling wild horses and burros again under the new Sales Authority. In April 2008, suddenly other kinds of horses were reported as transported to Mexico under the non-slaughter status and for only the second time in almost three years, no geldings were shipped the week before BLM issued their stunning announcement of the need to both sell and euthanize America's mustangs and burros.
- BLM <u>projects</u> the cost of short-term and long-term holding will exceed \$26 million dollars in Fiscal Year 2008 but in Fiscal Year 2009, BLMs budget projects holding costs will drop to the same level they were last year. BLMs also failed to include income generated from sales and adoptions of wild horses in their 2008/2009 budgets, estimated at least \$600k in 2007, while still listing the costs associated with adoptions in their negative cash flows.

While BLM routinely claims wild horses and burros must be removed to protect the range and maintain the "thriving ecological balance" for livestock and native wildlife, comparisons of wild horse and burro populations also failed to support BLMs claims of either "excess" or "balance."

Some figures include:

- In Fiscal Year 2007, BLM has continued to authorize forage allocations of over 11.1 million animal unit months (AUMs) for livestock grazing within the states wild horses and burros are managed in while wild horses and burros have only been allocated 309k AUMs, less than 3% of the available forage resources.
- As of 2004, the federal government manages more than 680 million acres of land in the United States. Wild Horses and burros are only allowed on 34.3 million acres and this fails to account for variables such as BLM applying over 1.1 million acres of habitat in Nevada considered "non-functional" because of no actual wild populations.
- As of June 2008, BLM manages livestock grazing on about 160 million acres and administers nearly 18,000 permits and leases on more than 21,000 allotments. Since 1980, the actual size of the cattle grazing on public lands has increased by 23% while ranchers still pay \$1.35 per month to feed both a cow and calf. Adjusted for inflation, this equates to approximately .54 cents a month.
- Wild horses and burros are also "managed" and removed to protect the "native species", which often refers to big game animals. Several studies have shown the economic value of game animals is many times higher than the value of livestock. A study done in 1996 estimated if hunting was hypothetically ranked as a corporation, it would place thirty-fifth on the Fortune 500 list of America's largest businesses.

- In 2007, free-roaming elk populations were estimated at 675-700k within just five western states; Colorado, Idaho, Utah, Montana and Wyoming. The gap between elk population estimates is almost as large as BLMs entire allowable management level of both wild horse and burro populations across the West. Within these same western states, wild horses account for only 1% of the elk population with just elk alone consuming almost 90% more forage than BLM allows wild horses and burros.
- Montana reported their elk populations, estimated at 130-160k, exceeds state population goals by 60%, while Colorado reported their elk populations of 250-260k have been over population objectives for over 20 years.
- Bighorn sheep are the most coveted of all hunting species and populations were recently estimated at now topping 70k, almost 3 times higher than the allowable wild horse populations and 24 times higher than wild burro populations. Bighorn enthusiasts often target wild burro habitat for bighorn sheep expansions and two of Southern California's oldest and genetically unique herds, the Coyote Canyon wild horses and the Clark Mountain wild burros, were zeroed out to convert the areas exclusively for bighorn sheep habitat.
- In 2005, almost 2.3 million dollars was raised at one auction for twenty bighorn hunting tags. Arizona was the big winner with one tag commanding \$199k dollars, New Mexico received \$177.5k and Montana's tag fetched \$160k.
- In Nevada's Lake Mead National Recreation Area, once home to the third largest wild burro population in the West, two of its three Herd Management Areas have been zeroed in the last ten years. The Muddy Mountains, which zeroed out the area for wild burro use using highly questionable standards, is now the second largest bighorn hunt unit in Nevada. Also, despite Lake Mead burros being "protected", Nevada Division of Wildlife's Game Division Chief Russ Mason has recently stated National Park Service merely shoots the burros to dispose of them.

Also included are historical accounts of past improprieties, allegations, malfeasance and abuses, which include:

- How there was nothing "stealth" about the Burns Amendment, which shattered thirty years of supposed protection prohibiting wild horses and burros from being sent to slaughter, but was actually the results of a Draft Management Plan for Wild Horses created in Nevada in 1998.
- How a 1998 Subcommittee Hearing for National Parks and Lands held in Reno, Nevada also outlined the slaughterhouse future awaiting America's wild horses and burros as well as how wild horses and burros should be managed as merely one or two tourist attractions per state, then they ".....could remove all the other horses from the west on much of our grazing lands." Nevada State Senator Dean Rhodes.
- In the same year, Dale Tunnel, special agent in charge of BLMs division of law enforcement in Santa Fe, NM stated BLM would run one herd into another management area just to say it's overpopulated so BLM could take a certain number off the land. Also included is a current statement from a local resident testifying this same thing is happening today, with BLM admitting they dropped off 40 wild horses in the area six months after round ups were conducted with more wild herds mysteriously arriving this spring.

- In 1997, a report released by the Public Employees for Environmental Responsibility (PEER), Horse Slaughter Anatomy of a Cover-Up, stated, "BLM has tolerated and in some instances facilitated the routine and illegal trafficking of wild horses to slaughter. The agency has obstructed efforts by its own law enforcement officers to expose commercial theft of wild horses, fraudulent adoption schemes and fictitious "sanctuary" herds not only to avoid embarrassment but also to maintain the flow of horses off the range."
- Some of the alleged methods used were; theft of wild horses during BLM sponsored "gathers" or captures, "black booking" or phony double branding of horses so that duplicate branded horses could disappear without a paper trail, manipulation of wild horse adoptions where one person holds the proxies for a group of supposedly separate adopters and the horses all end up at slaughter; use of satellite ranches to hold horses for days or weeks as stopping points on the way to slaughter, fraudulent use of wild horse sanctuaries--ranches subsidized by the federal government to care for unadoptable wild horses deemed excess and removed from the range-as fronts for commercial exploitation.
- How a four-year grand jury investigation into these allegations was slammed shut before ever going to trial as well as how lawyers from the Department of Justice urged the case be dropped because "the tolerance within BLM for the horse to slaughter trade was so widespread that it would be unfair to single out any one person for prosecution."

While BLM maintains their options are limited, now narrowed to merely choosing which way the American public wants to see wild horses and burros die unless BLM is given more money, another option exists, though it is hardly one BLM will recommend, and that is to examine the validity of BLMs claims and investigate their management.

Research and analysis based on BLMs own statistics has shown their current population reports or population goals cannot be valid. As a result, the simplest solution to the current "crisis" is to return the wild horses and burros back to the range, as statistics reveal they should have never been captured and warehoused in the first place.

Additionally, independent oversight of BLMs activities in the wild horse and burro program must be implemented to prevent them from running so far amuck again, as well as instituting a sincere system of checks and balances, which would at least slow down their ability to operate without challenge or consequence.

However, the long-term solution to saving America's wild horses and burros must be found in making them of monetary value roaming free on the range. Anything less will continue to pit one special interest group against another, cause enterprising individuals and/or agencies to find ways to increase revenues through the demise of Americas heritage species, as well as causing those that pull the financial strings behind Americas curtain to via for ways to increase productivity – with or without our free-roaming wild horses and burros.