

August 28, 2018

Bureau of Land Management – USDI

Burns District Office

28910 Highway 20 West

Hines, Oregon 97738

Attn: Mare Sterilization Research Project Lead

Email: [blm\\_or\\_spaystudy\\_warmsprhma@blm.gov](mailto:blm_or_spaystudy_warmsprhma@blm.gov)

Re: DOI-BLM-ORWA-B050-2018-0016-EA (Spay Feasibility & On-Range Behavioral Outcomes Assessment; Warm Springs HMA Population Management Plan) Mare Sterilization Research Environmental Assessment (EA)

**Public input deadline: 8/31/18**

Link to EA: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=158496>

Dear Public Officials:

As a lifelong wild horse and burro observer and advocate, I have reviewed your recent EA, which analyzes possible wild mare spaying experiments on the Warm Spring wild mares. Quite frankly, I am shocked that you would propose such a cruel procedure! This would make a mockery of the Wild Free-Roaming Horses and Burros Act (WFHBA), whose mandate is to protect & preserve America's remaining wild horses & burros in the wild, not subject them to gruesome & invasive operations that would seriously compromise their individual well-being as well as their long-term survival (see letter to BLM sent by Veterinarian Don Moore, 8/18).

I therefore implore you not to go ahead with this ill-conceived plan, but rather to honor your noble duty to protect & defend the wild horses, both individually & collectively, & to reinstate their rights to their legal lands & adequate survival resources.

As a professional wildlife ecologist concerned about the future of wild horses & in place of this insensitive plan, I recommend that you work to restore truly long-term viable habitats for truly long-term viable populations, both in Warm Springs & wherever else these "national heritage" animals belong according to both legal & natural law. These animals are deeply rooted natives

in North America. Indeed, there are few lineages whose presence reaches as far back – to shortly after the demise of the dinosaurs nearly sixty-million years ago, & whose presence is very long-standing in North America. In the case of the modern horse species, *Equus caballus*, this amounts to at least ca. two million years & in the case of the genus *Equus* to ca. four million years (MacFadden, B. J., 1992).

Another major aspect that is being willfully overlooked & that is a major consideration concerns the many major positive contributions that wild horses make in many natural ecosystems. It is well substantiated that members of the horse family: Equidae contribute substantially to healthy soils, especially as pertains to their vital humus content and, consequently, to their retention of water – which augments water tables that are crucial to many dry Western ecosystems. Also, their post-gastric digestive system disperses intact seeds, including from many native species. These go on to successfully germinate, especially provided the rich fertilizer that accompanies them in the form of equid feces.

These are major positive points concerning the naturally living horses whose ignoring would be very wrong. And there are many other similar positive points about naturally living equids, some but by no means all of which are explained in books & articles including some of my own (Downer, C.C. 2011, 2014, etc.). One further point, however, we must not overlook. And this concerns the ability of wild horses to greatly reduce that dry flammable vegetation that is a major contributing cause of many of the catastrophic wildfires that are having such devastating effects today. Wild horses reduce this not only earlier in the year but also substantially later in the year, as their mono- & post-gastric digestive system allows them to process drier vegetation and to derive considerable nutrition therefrom without having to expend the more taxing amounts of metabolic energy to which most multi- & pre-gastric, ruminant digesters, such as cattle, sheep, and deer, are subject. And the consequent reduction of this potential (later in season) or actual dry flammable “tinder” and “kindling” often prevents or at least greatly mitigates the ecologically as well as economically harmful effect of wildfires. These wildfires are greatly on the increase today due to a variety of factors, chief of which is Global Climate Change, aka Global Warming – a phenomenon we humans ignore at our & Life’s great peril!

It has been estimated that a single, average-sized wild horse over the course of several years can reduce dry vegetation, including not only grasses & forbs but also brush & some trees, so as to save at least ca. \$100,000 in loss of valuable habitat & human infrastructure (Simpson,

William, 2017, 2018). Much of this critical & indispensable role that wild horses play is due to their ability to reach remote, steep, & rocky places where most of ruminant herbivores have a difficult time reaching & where lightning strikes & other forms of fire ignition, including off-road/highway vehicles & campfires, often initiate furious blazes that tend to spread far & wide before they can be put out, especially given increased drying out of habitats & windy conditions. Concrete examples include: (1) the Rush Fire of 2012. This occurred in the Twin Peaks Wild Horse & Burro Herd Management Area in NE California and shortly after the wild horses & burros there were greatly reduced by a major BLM-sponsored helicopter roundup; & (2) the Red Rock Fire west of Las Vegas, Nevada, which broke out shortly after a historical herd of wild horses were eliminated from the southern Spring Mountain Range where they had legal right to live under the WFHBA. Many similar examples of catastrophic wildfires have occurred right after draconian reductions/eliminations of wild horses &/or wild burros throughout the West & throughout the world – and this correlation should be scientifically evaluated on a broad scale. However, there is no time left for us to delay, for both common sense & abundant evidence indicate that equids play a vital – in many cases even indispensable -- role in fire prevention. To overlook and fail to deploy the wild horses in this crucial role today would be unconscionable! It would constitute a major oversight for which we humans along with all the Rest of Life would most seriously pay in terms of future & and more grave suffering and death.

Many other supportive points can & should be made about horses returning to their natural lives & habitats so as to become a long-term component of their distinctive life communities. Indeed, this remains the very purpose of the unanimously passed Wild Free-Roaming Horses & Burros Act – one of the most ecological acts of Congress ever passed, for mandating that these equids be allowed to become “integral parts of the public lands’ ecosystem” & be treated with “minimum feasible interference” as well as honored as a great aesthetic resource & historic heritage (see also: National Historical Preservation Act).

For the above & other equally valid & related reasons, I again request that you reconsider your proposal to spay America’s wild horses, whether experimentally or as a permanent government activity. This would be a reprehensible decision that would set off a wave of cruelty & disrespect toward horses & burros & their valuable place in their natural homes. I predict this would bring most regrettable long-lasting consequences whose very contemplation makes me shudder!

I propose that you adopt a much more positive & benign approach to America’s wild horses &

burros, their protection, preservation & restoration to long-term viability. That branch of Conservation Biology known as Reserve Design needs to be adopted in order to achieve:

(1) true & long-term viability of each unique equid herd;

(2) true & harmonious ecological adaptation by each unique herd to the unique ecosystem it inhabits. And this must involve the securing & permanent provision of the appropriate long-term-viable habitat that will be commensurate with a long-term viable equid population numbering in the thousands; and finally

(3) a truly well balanced & naturally self-stabilizing population, where natural barriers, predators, and other constraints do not overly impinge upon the wild horses' intrinsic well being, both as individuals and collectively.

These three & additional interrelated goals can be achieved through adoption of the sound principles of Reserve Design (Downer 2015).

With this I conclude for now in anxious expectation of your thoughtful reply, for the sake of the horses most of all. These are highly evolved & beneficial presences here on this Earth we share as home. These are *beings* to whom we humans owe much more in terms of Respect and Sharing.

Sincerely,

Craig C. Downer

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Cc: various interested parties.