

## AMERICA'S OBSTINATE PUBLIC LANDS ESTABLISHMENT TAKES AIM AT AMERICA'S LAST WILD HORSES AND BURROS THROUGH DISINFORMATION

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Band of healthy, harmonious wild horses in northern Pine Nut Mountain HMA, east slope scenic backdrop looking south. 2016. Photo Copyright by Craig C. Downer

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Particularly during the present year, 2023, I have become more aware of an intensification of attacks on America's wild horses and burros by what I choose to call "the establishment". Concurrently and undoubtedly in reaction to these stepped-up attacks, an increasing revelation of the wild horses' and burros' greater story and justification for being here has occurred. As well as in the popular media, including television programs viewed by thousands, these attacks have appeared in supposedly fair and balanced, erudite textbooks, articles, and conservation magazines. These may present much information that is valid and important, defending various species and ecosystems, but when it comes to the naturally living horses and burros, suddenly an attitude of bias creeps in, causing a filtering of facts and a twisting of their interpretations in deliberate order to discredit America's wild horses and burros.

This discrediting, or smear, downplays or ignores the importance of the deep origin and long-standing duration, involving thousands of generations, that present-day horses and burros and their ancestors have evolved and experienced life throughout North America and right up to geologically recent times. Generally, the claim that the horses disappeared at the close of the Pleistocene Epoch, aka the Ice Age,

around 10,000 to 12,000 years ago, is made together with the claim that the ecosystem has changed to such a degree since then that the equids no longer have a legitimate place, niche, or role to play here. This blanketing statement then permits the detractors to pin the label of “destructive invasive species” on the wild horses and burros. Though there is much credible evidence that horses survived in North America up until much more recent times, also a more objective and expansive view of life’s evolution reveals that even ten or twelve millennia amount to only a very tiny fraction of life’s history, or timeline. It would be unreasonable to ignore the preceding thousands and even millions of years during which equid ancestors played major roles in the North American life community and their lasting effects here. All the millennia of co-existence, co-evolution, and interrelating between these equids and North American plants and animals should not be so blithely dismissed! Interrelationships between and among organisms and their species build communities and enhance life on Earth – and these are not simply erased! In spite of the vagaries, the ups-and-downs of conditions on Earth, such as climate, newly emerging or immigrating species, etc., ecosystems persist due to their resilience and an important part of this involves the re-establishment as well as the refinement of vital mutualistic symbioses, or ways of living together.

An additional important point is that wild horse-and-burro detractors often overlook the global nature of life’s evolution. This involves the interties between and among the various continents and their biomes. In other words, North America fauna and flora did not evolve in a vacuum, but have experienced much interchange of species – a point particularly relevant to northern hemisphere continents and the repeated back-and-forth exchange of their equid species.

This brings me to another key criticism of the narrow-minded, tunnel-vision approach of wild-horse-and-burro detractors. Their scope on the subject has become overly restricted because of their attachments to the prevailing status quo and an agenda devoted to perpetrating this, in spite of the dangerous consequences. – By turning off their more critical faculties and repulsing a more universal identification with the whole family of life, they risk ignoring obvious solutions to humanity’s most pressing problems. These solutions often stand right before them but are ignored. They are latent possibilities for life that involve our human species and all the other species and groups of species, each of which has an important role to play and niche to fill in Earth’s life community. In upshot, people who rashly dismiss wild horses’ and burros’ refilling and further evolving their North American ancestors’ beneficial ecological niches are lacking in imagination, belief and faith in Life, as well as breadth of scope, insight, objectivity, and wisdom. But by no means is this a permanent ailment!

The various races of horses and burros that have returned to North America from Asia, Eurasia, Africa, Europe and elsewhere are, in fact, returning to their greater “cradle of evolution.” This truth is based upon millions of years’ worth of their prior ancestry, which makes possible their ready adaptation to many of North America’s ecosystems, even those that have somewhat modified since the Pleistocene epoch. The present ecological states are not so different from those of the past, as wild horse detractors like to claim. And both phenotypically and genotypically, the horse and burros have a great head start when they return to the wild because of the re-emergence of adaptive traits and behaviors that are suited to survival in North America. *Ipsa facto*, wild horse and burro detractors depend on a narrow-minded view of the horse and burro species and their history on Earth. They dismiss a greater, more in-depth understanding of the ongoing process of evolution concerning how traits and behaviors that are suitable can reemerge and even further adapt, or “catch up” – thanks to all those thousands of generations of living and adapting that were experienced by the horses’ and burros’ ancestors.

Let's now examine in greater detail the generally negative claims of those denying wild horses' and burros' justified place in natural North America. Here I am particularly concerned with a chapter entitled "Feral Equids" in the somewhat stilted textbook: Rangeland Wildlife Ecology and Conservation that was published on September 2, 2023 (see [https://doi.org/10.1007/978-3-031-34037-6\\_21](https://doi.org/10.1007/978-3-031-34037-6_21)).

Firstly, three of this chapter's authors come from universities in states known to be anti-wild-horse in their general politics and policies. The same can be said of the government agency for which the other author works. Also, based on their dogmatic past publications and public statements, these authors have questionable objectivity concerning the naturally living, or wild, horses and burros in America. They adhere to the view that modern horses and burros are not North American natives. Though this view is strongly opposed by many professionals, they continue to try to discredit the evolutionary place of wild horses and burros in North America, particularly in the West. This also reflects the policies of their institutions to which they are beholden. For example, both Utah and Wyoming state governments, representatives and senators, both state and national, have repeatedly issued virulent attacks on America's wild horses and burros in order to justify their elimination not only in their states but throughout the West. The US Geological Survey has also issued very tendentious publications, conclusions and recommendations based on studies that are not entirely objective. All of the foregoing seek to either reduce the herds to sub-viable levels, compromised by various means of invasive sterilization, or urge their entire elimination. They consistently made light of or ignore much positive evidence that substantiates the legitimate place of the horse and burro in North America as deeply rooted and ecosystem-restoring natives. Here they count on nature's complexity and the public's too-often shallow understanding of the intricate workings of ecosystems in order to achieve their discrediting of the wild horses and burros. They count on lazy readers or television viewers who do not question but accept over-simplifications and even distortions of the wild horses and burros greater story and truth.

The chapter's title, "Feral Equids," shows disrespect for wild horses and burros. By labeling them "feral", or escaped domestics, rather than "wild", i. e. belonging to the natural life community, they set the stage for a devastating discrediting of these legally protected animals who, in fact, possess deep and long-standing North American roots. And they ignore the fact that the horses and burros quickly revert to their respective "wildtypes" and that they do so by reviving instinctual behaviors and adaptations for survival that reflect their deep ancestral roots. Both horse and burro are much more natural than altered due to domestication by humans.

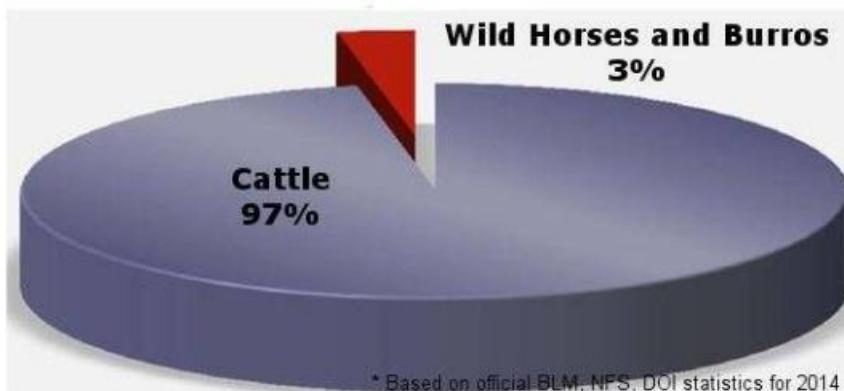
The chapter's adoption of the species' name *Equus ferus caballus* purports to recognize a new species of horse, to wit: the feral, or escaped domestic, horse. Yet, upon escaping their human-imposed confines, these horses usually quickly revert to a near totally wild state. They become harmoniously adapted to habitats that have much more in common than different from where their ancestors lived not only for thousands but millions of years. Also, they often readily interbreed with horses whose lineage has always remained in nature. These points prove that they are the same species: *Equus caballus* – not *Equus ferus*!

Genetic analysis strongly substantiates the long-standing evolution of the modern horse species in North America, dating back to at least 1.8-million years (Forsten 1992; Vila 2001).

The definition of "feral species" as "species that have been established from intentional or accidental release of domestic stock that result in a self-sustaining population ... generally non indigenous and often invasive" is from The Wildlife Society – TWS, for short (2021). This institution's long history overly favors hunted species and has nearly always sought to discredit and eliminate America's wild horses and

burros, which are not hunted. Thus, TWS ignores nearly all that justifies these wild equids' continued place in our nation and North America. TWS's definition of feral differs from the more usual definition meaning: "wild, or existing in a state of nature, as animals or sometimes plants; having reverted to the wild state, as from domestication, pertaining to or characteristic of wild animals ... [L. *feritas*, < *ferus*, wild]" (New Websters's Dictionary of the English Language, Deluxe Encyclopedic Ed. Delair Publ. Co. 1981, p. 360). In the cases of the horse and burro, little significant alteration of the species has occurred, as is proven by their readily reverting to wildtype and their ability to survive in their earlier, more time-proven, natural lifestyle, body form, and ecological roles, in comparison with certain other, extremely repressed domesticated species.

## Grazing Usage of Public Lands



Data collected by Vickery Eckhoff / [www.DailyPitchfork.org](http://www.DailyPitchfork.org)

One estimate of the gross disproportion of forage usage by Livestock as compared to that of Wild Horses and Burros on US Public Lands. Copyright by Daily Pitchfork / Vickery Eckhoff. Other scholarly estimates put the wild equid percentage at 1% or less.



Marietta Wild Burro Range wild burros. Late August, 2023. Copyright by Craig C. Downer. For Craig's recent appeal to spare these wild burros from extreme herd reduction by BLM, see <https://thewildhorseconspiracy.org/marietta-burro-roundup-appealed/> .

Concerning wild burros, the Feral Equids chapter bluntly states that "... the lack of research on burros has resulted in a general gap in our knowledge of this species." This statement is uninformed and reveals a failure to conduct a basic literature review, including significant field studies by Dr. Patricia Moelman as well as Dr. Erick Lundgren and others. The latter has shown how wild burros, as well as horses, sniff out and dig down to subterranean water sources, thus creating ponds of fresh water that become accessible to many other species of animals that would be unable to do this. These equid-created ponds can generate desert oases that are filled with many plants, including *keystone* willows and cottonwoods, as well as animals that otherwise would have a much harder time surviving in arid or drought-stricken areas ( <https://www.horsetalk.co.nz/2016/06/05/secret-lives-well-digging-burros/> and the video: <https://youtu.be/HQAk7FIQCJA> ). In fact, wild burros, as also wild horses, are returned *keystone* species.

The chapter's claim that "[a]ll equid species ultimately became extinct during the late Pleistocene epoch ..." ignores much evidence to the contrary, including a number of fossil carbon age-datings, petroglyphs, and Native American tribal histories, as well as earlier European and Asian explorer reports (Downer, C.C., 2014, Ch. I, pp. 1-32, Figs. 1, 2, 3, p. 19, Sidebar, pp. 16-17; Collin, Y.R.H, 2017; Haile, J. et al., 2009. <http://www.pnas.org/cgi/doi/10.1073/pnas.0912510106> . Collin's doctoral dissertation is especially well reviewed as concerns traditional native history and is entitled: "The relationship between the indigenous peoples of the Americas and the horse: Deconstructing a Euro-centric myth" (2017, U. Alaska Fairbanks).

Though the chapter claims there is a major difference between domestic and feral [wild] horses today and their non-domesticated ancestors (Fage et al, 2019 in chapter), other thorough analyses indicate relatively minor differences ([https://snm.ku.dk/english/news/all\\_news/2018/2018.2/horse-origins-turned-upside-down/](https://snm.ku.dk/english/news/all_news/2018/2018.2/horse-origins-turned-upside-down/); Gaunitz, et al. Ancient genomes revisit the ancestry of domestic and Przewalski's horses. *Science*. DOI: 10.1126/Science/aa03297; Lundgren, E.J. et al. 2018. Introduced megafauna are rewilding the Anthropocene. *Ecography* 41(6): 857-866; Forsten, A. 1992. Mitochondrial-DNA timetable and the evolution of *Equus*: comparison of molecular and paleontological evidence. *Ann. Zool. Fennici* 28: 301-309.)

On another important topic, the chapter seems to deliberately ignore the well-founded concept of *Rewilding*, both of species and of ecosystems. Rewilding shows more respect for the holistic nature of the species and their communities. Feral Equids refers to species that were once domesticated, but return to their natural homes, as undergoing "Feralization." This de-emphasizes these impressive animals' intrinsic value, both as individuals and species. Both in space and in time, it ignores their greater place and role on our shared Earth home. Also, it ignores their place in the greater Family of Life that transcends their being mere solitary species considered alone and by themselves – a point we *Homo sapiens* should certainly ponder.

The authors give little recognition to the fact that life on Earth is continually changing and evolving, and that after periods of upset, even mass extinction, the life community possesses a remarkable way of reconstituting itself. It offers up survivor species and groups of species that resume certain necessary roles and fill certain interrelated niches previously played and filled but by species whose precise taxonomic classifications can be quite different from those that have succeeded them.

(<https://www.horsetalk.co.nz/2022/05/09/truly-good-americas-wild-horses/> ;  
<https://www.horsetalk.co.nz/2019/05/06/ecosystems-horse-ecologist-wild-horse-message> ;  
<https://www.horsetalk.co.nz/2018/06/04/brumbies-useful-australian-ecosystem> ;  
<https://www.horsetalk.co.nz/2020/09/08/justice-equine-scapegoats-australia-brumby-debate> ; and references). In this regard the great importance of restoring megaherbivores, such as the equids, after the considerable decline and disappearance of many species present on Earth ca. 11,000 years ago should also be recognized (see Ripple, W.J., et al. 2015. Collapse of the world's largest herbivores. *Science advances*, 1(4): e1400103. <https://advances.sciencemag.org/content/1/4/e1400103.full> . )

On a related issue, why do the authors insist on calling the legally protected wild horses and burros "feral" when the unanimously passed Wild Free-Roaming Horse and Burro Act (WFHBA) clearly designated them as "wild", i. e. recognized them more for their integral place in the greater world of nature than as a repressed and human-altered -- domesticated animals? And why do they ignore that humans' domestication of these animals, in fact, represents only a very small portion of their evolutionary time on Earth?

Feral Equines plays along with the regulatory tricks that have, in fact, been subverting the true intention of the WFHBA for many years. Such disregard for this law has been eliminating wild horses and burros from the majority of their legally declared habitats "where they were found" in 1971 on a year-round basis throughout the 52 years of the program's operation (see <https://www.horsetalk.co.nz/2021/12/15/50-years-saving-americas-wild-horses/> ) . Originally, many more legal equine "ranges" on BLM-USDI and US Forest Service-USDA lands existed. Their true legal area should be equivalent to at least the double of the presently overly reduced Herd Management Areas

(177 HMAs) on BLM and Wild Horse and Burro Territories (53 WHBTs) on Forest Service lands in the western states. As for their original legal acreages, by far most are now “zeroed out” of their original wild equid herds. This has occurred to the detriment of these ecosystems, that lack the healing balance as well as resilience, and the enhancement of biodiversity that is brought about by these Perissodactyla herbivores (see Ripple, *et al. op. cit.*).

Given any sense of fairness and deserved compensation for earlier unjust treatment, in their remaining smaller and less numerous habitats that BLM/USFS still recognize as appropriate for them, the wild horses and burros should, at long last, be treated as the “principal” presences on “... 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 concept for the public lands” (Section 2 c of the WFFBA).

Another important point concerns the government’s duty to achieve fair “multiple use” on the public lands. These public servants should prevent monopolistic use of these lands that are “held in trust.” It follows: there should be many more wild horses and burros that should be given more habitat, including water and forage allocations. This would achieve true multiple use in accord with the Multiple Use and Sustainability Act, Public Lands Restoration Act, as well as the Federal Lands Policy and Management Act. To ignore the fact that at present the wild horses and burros are grossly outnumbered and receive only a small portion of the forage allocation relative to, not only cattle and sheep, or livestock, but also to big-game animals is clearly outrageous (see graph above; Eckhoff, V. 2020. Cattle vs. Wild Horses 2002-2018 All data by BLM; PEER 2022 <https://peer.org/americas-rangelands-deeply-damaged-by-overgrazing>; <https://peer.org/nevada-has-a-very-bad-grazing-problem/> This recent report compares livestock and wild horses and burros on US public lands and the tendency to unreasonably fix the blame on the wild equids; also see <https://www.horsetalk.co.nz/2021/08/22/outrageous-treatment-americas-wild-horses-habitat/> ). Furthermore, America’s wild horses and burros should be protected under the National Historical Preservation Act, as they constitute a “living heritage/treasure” dating back to colonial and even pre-colonial times. Their unique lineages should also be protected by the Endangered Species Act.

So many wild horse and burro herd reductions have been authorized in part under the often asserted “Multiple Use and Sustainability Act,” yet these reductions are perpetrating monopolistic uses and abuses by “permitted” public lands livestock ranchers, as well as mining and energy, hunting, land developing, and other interests at the direct expense of a relatively small number of wild equids and their relatively minor forage and water consumption. Also concerning the Off-Highway-Vehicle (OHV) present on the public lands, unfair favoritism occurs. OHV races and even OHV National Recreational sites are often approved. One such is in the Conger Wild Horse HMA in western Utah on BLM land. Here OHVs are often allowed to devastate the natural serenity along with the habitats of wild horses and burros and other wildlife. (See photo below as well as field report: <https://thewildhorseconspiracy.org/2021/04/17/report-on-wild-horse-herds-and-habitats-in-western-utah-and-eastern-and-central-nevada/> )



Sign showing route, BLM OHV Nat. Rec. Site in Conger Wild Horse HMA, 3/2021. Copyright C.C. Downer

Concerning Colonial history, Feral Equids perpetuates the view that the 1680 Pueblo indigenous revolt against Spanish colonists and the resulting release of thousands of horses served to create the primary nucleus of mustang herds that spread throughout North America. But this has been called into question by substantial evidence that wild horses were well established in many areas long before the Pueblo Revolt (see Taylor, W.T.T. et al. 2023, March 30. Early dispersal of domestic horses into the Great Plains

and Northern Rockies. Link:

<https://EarlydispersalofdomestichorsesintotheGreatPlainsandnorthernRockies>).

Some television programs (The Human Footprint, PBS TV. Episode: Stranger in Paradise. 2023; NBC Nightly News, 9/15/23; CBS 60 Minutes, early 2023) and popular magazine articles (*Sierra, The Magazine of the Sierra Club*, Summer 2023) have been irresponsibly and uncritically disseminating alarming disinformation about wild horses and burros that equates them to destructive invasive non-native species. Particularly The Human Footprint places them alongside such truly alarming invasive species as the Asian carp in the upper Mississippi and the wild boar on the Big Island of Hawaii. With a few short and pretentious sentences and snapshot images and videos, these media workers seek to assassinate the credibility of America's wild horses and burros as benign presences by ignoring the "bigger picture." This greater view should include:

(a) their deep, long-standing evolutionary ancestry to recent pre-Columbian times in North America; and  
(b) their substantial positive contributions to ecosystems as soil builders, seed dispersers, Carbon sequesters, catastrophic wildfire mitigators and preventers, enhancers of biodiversity and ecosystem resilience, etc.

Since so much of the public lands grazing permits are issued to multi-millionaires and their corporations, it is not hard to imagine that publications and broadcasts are subject to undue influence from these politically and economically powerful, wild-horse-denigrating interests. (See earlier references to Eckhoff, V., and PEER, as well as <https://www.horsetalk.co.nz/2021/07/17/horses-carbon-sequesters/> and [https://www.researchgate.net/publication/274006946\\_The\\_Horse\\_and\\_Burro\\_as\\_Positively\\_Contributing\\_Returned\\_Natives\\_in\\_North\\_America](https://www.researchgate.net/publication/274006946_The_Horse_and_Burro_as_Positively_Contributing_Returned_Natives_in_North_America) )

The Feral Equines chapter blithely ignores the ability of these deeply rooted wild horses and burros to reactivate similar traits and behaviors that their more ancient North American ancestors possessed. These enable them to adapt and survive in North America, their greater evolutionary cradle, when contrasted to the Old World: Europe, Eurasia, Asia, and Africa. In this regard, (a) the great genetic variety of both horses and burros (as related to their deeply rooted inheritance) and (b) the difference between dormant and activated traits and behaviors associated with these genes should be given careful consideration. Both these factors enable a great plasticity in the wild horses and burros that, in turn, enables a greater adaptability to changes that have occurred since the great Pleistocene die-out or diminution of species around 10,000 to 12,000 years ago. And this also relates to the major changes that are now occurring due to Global Climate Change and the human population explosion of what many are now calling the Anthropocene epoch.

As a further major oversight, Feral Horses fails to recognize how private and government agencies relabeled certain terms that were in the WFHBA in order to subvert its true purpose, meaning, intent and spirit. This constitutes a serious violation and upending of an unanimously passed law in the General Public's interest and concerning a widely appreciated Quality-of-Life issue. In this regard, I recommend reading a 2022 treatise by a Native American wild horse advocate and legal worker (see Barbour, T.J. 2022. Relabeling of Acreage Created the Overpopulation Myth of Wild Horses and Burros. Published by Citizens Against Equine Slaughter, P.O. Box 115, Drain, OR 97435; [val4.wildhorses@gmail.com](mailto:val4.wildhorses@gmail.com). Also available on *Academia* research article resource website.).

Over the course of the past 52 years, the above and related conspiratorial maneuvers have permitted an insidious "zeroing out," or elimination, of wild horses and burros from the major portion of their rightful,

legal Herd Areas on BLM and Territories on US Forest Service lands, involving many millions of acres. On top of this has occurred draconian herd reductions to genetically sub-viable population levels. This has been “achieved” in collaboration with some of the wild horses and burros’ most inveterate enemies, through the assignment of woefully inadequate “Appropriate Management Levels” (AMLS). The latter set the herds up for alarming future decline and eventual demise. Their demise is further assured when BLM and US Forest Service subject the remaining equids to major fertility control and sterilization programs that interfere with their basic physiologies, survival fitness, and ecological adaptations. It is known, for example, that the largely untested and unmonitored sterilization drug PZP (*Porcine Zona Pellucida*) not only replaces natural selection with human selection but that those mares who have the weakest immune systems are precisely the ones for whom it is least effective. Hence, I predict it will not take many generations of PZP administration for the enemies to have created a population with an extinction-bound, defective immune system. How this meshes with such major survival challenges as Global Climate Change, environmental pollution and overpopulation by humanity may not be an easy or pleasant contemplation. What will be left of the natural public lands and their wild and naturally living horses and burros if this impending disaster is not averted through sincere, caring, and intelligent reforms?! What will be left on our precious, shared home: Planet Earth? (See

<https://www.horsetalk.co.nz/2020/03/24/pzp-wild-horses-do-not-belong-together/ .>

While we must not overlook the many illegal removals of wild horses and burros from their legally-declared Herd Areas on BLM and Territories on US Forest Service lands that occurred during the early years of the act, neither should we overlook how, in spite of an effort to fairly implement the WFHBA during the 1970s, since the early 1980s there has prevailed an extremely negative policy that aims to obliterate America’s wild horses and burros, regardless whether Republicans or Democrats are in power (see [The Wild Horse Conspiracy](#), especially Ch. III: Injustice Toward America’s Wild Horses and Burros & What Must Happen at <https://www.amazon.com/dp/1461068983>; <https://thewildhorseconspiracy.org> and its various reports and sources).

Feral Equids chose to show a few photos of wild horses in emaciated body condition as well as horses in difficult, mid-storm conditions where they had to paw through snow to obtain forage (a behavior often of great benefit to weaker animals). This slanted presentation thus ignores the great majority of wild horses and burros who are in excellent condition and do not live in such trying conditions. And it fails to acknowledge that the wild horses and burros are often deliberately set up by fence construction, exclusion from more fertile soil and water sources, among other harassments designed to prevent them from occupying their adequate and legal, viably sized and holistically complete habitats.



Three Sulphur HMA wild horses in good condition, running. 3/2021. Copyright by Craig C. Downter

In discussing the distribution of wild horses and burros in the United States and globally, the chapter blithely fails to compare the distributions of other large ungulates species, including game animals such as mule deer, elk, bighorn, and pronghorn, and, of course, domesticated cattle and sheep. Most of these have distributions, numbers, and forage and water consumption totals that considerably outweigh those of the wild horses and wild burros. And burros consume considerably less than a horse, estimated ca. one half, though BLM and US Forest Service frequently lump them together as though equivalent.

An extreme example of this unfairness and imbalance is found in the vast ca. 2-plus-million-acre Apache-Sitgreaves National Forests of Arizona. Here the US Forest Service's plan is to deny the wild horses nearly all of their legal habitat and relegate them to a mere 19,700-acres with an AML of 50 low to 104 high for a mean of 77 wild horses. For an in-depth ecological and herd, as well as historic and legal, peer-reviewed study, see Downter, C.C. 2022 (Heber Wild Horses of Arizona's Apache-Sitgreaves National Forests with 40 Ecological Transect Results and Herd Description. *Cheiron: The International Journal of Equine and Equestrian History*. Vol. 2, Issue 2, 2022, available at <http://trivent-publishing.eu/>).

In many other countries where wild horses are scientifically investigated, a more positive view of their contributions to ecosystems is emerging. The international organization called Rewilding Europe has promoted several successful projects in which naturally living horses are allowed to more freely play/fill their ecological roles/niches. These monitored projects are proving the substantial value of wild horses both to the natural community and to the people who live in and around them, also in terms of ecotourism (see Rewilding Europe at <https://rewildingeurope.com/rewilding-in-action/wildlife-comeback/wildhorse>; <https://inspain.news/herd-of-wild-horses-bring-new-life-into-depopulated-spain>).

Recently a thorough assessment of suitable habitats for rewilding world-wide by means of naturally living horses has produced some positive results. This has shown that horses fill vacant niches for medium-to-large-sized herbivores, which is very important in many ecosystems. This study was conducted by a team of ecologists and equine experts and took over a decade. Among other continents, it indicated that North America, including the western United States, is, in large portion, ecologically appropriate for the naturally living horses in terms of soils, vegetation, topography, climate, and other ecological factors. (See Naundrup, P.J. and Svenning, J.C. (eds) 2015. A geographic assessment of the global scope for rewilding with wild-living horses. *PLoS one* 10(7) e0132359.

<https://www.ncbi.nlm.nih/pmc/articles/PMC4503665/> .)

In Feral Equids treatment of “Population Estimates of Feral Equids in the United States,” a glaring need is revealed to compare wild equid numbers, as well as the forage, water, and other resource consumption amounts with the same factors for domestic cattle and sheep as well as big game herbivores. This would provide a just perspective, i. e. the big picture, concerning what is happening on U.S. public lands. It is not enough merely to uncritically repeat that the equine numbers exceed the assigned AMLs without providing the greater range of factors. These include livestock and big game, mining and energy development, aquifer pumping for development of adjacent lands, vehicle disturbance, including OHVs and vehicle off-roading and predator elimination. (See

<https://awionline.org/sites/default/files/uploads/documents/AWI-WL-FinalWildHorseandBurroReportWithStateMaps10-26-12.pdf>

and updates; Eckhoff, V. op. cit;

<https://www.horsetalk.co.nz/outrageous-treatment-americas-wild-horses-habitat/> ; Downer, C.C. 2015.

Pine Nut Mountain Wild Horse HMA/HA report for Friends of Animals, Darien, CT)



Cow struck by auto, killed, along Utah Hwy 21 near Sulphur HMA. 3/2021. Copyright Craig C. Downer.  
(See

[https://www.researchgate.net/publication/353317432\\_REPORT\\_ON\\_WILD\\_HORSE\\_HERDS\\_AND\\_HABITS\\_IN\\_WESTERN\\_UTAH\\_and\\_EASTERN\\_and\\_CENTRAL\\_NEVADA\\_WITH\\_FOCUS\\_ON\\_UTAH'S\\_SULPHUR\\_and\\_CONGER\\_HERD-MANAGEMENT-AREA/](https://www.researchgate.net/publication/353317432_REPORT_ON_WILD_HORSE_HERDS_AND_HABITS_IN_WESTERN_UTAH_and_EASTERN_and_CENTRAL_NEVADA_WITH_FOCUS_ON_UTAH'S_SULPHUR_and_CONGER_HERD-MANAGEMENT-AREA/)

On the subject of population growth, Feral Equids takes an over simplistic view. For example, the authors fail to recognize the major predation that occurs of both horses and burros by mountain lions (*Felis concolor*) in many areas throughout the West and how this factor helps stabilize at least several known herds. These include the Montgomery Pass mustangs on the California-Nevada border above Bishop as well as the wild burros of eastern California near Death Valley. (See Lundgren, Erick *et al.* 2022. A novel trophic cascade between cougars and feral [sic] donkeys shapes desert wetlands. *Journal of Animal Ecology*, <https://doi.org/10.1111/1365-2656.13766>; Turner, J.W. *et al.* 2011, Feb. Seasonal mountain lion predation on feral [sic] horse population. *Canadian Journal of Zoology* 70(5) 929934.

<https://www.researchgate.net/publication/238026719-Seasonal-mountain-lion-predation-on-a-feral-horse-population> ). Among other species, wolves are also known to be major predators of these equids and there is much illegal killing and removal by humans that has always occurred. The cursory treatment by Feral Equids merely lists the methods of census without giving any analysis, comparison, or criticism. Such issues as possible double counting of horses and burros and overestimation of population growth rates that are usually given as 20% or more per year by the BLM and USFS are crudely ignored.

Under “Habitat Selection, Home Range Sizes and Movement Patterns,” Feral Equids blatantly asserts that the “feral equids did not co-evolve within the areas they reside in,” thus, ignoring all their substantial ancestral evolution in North America, more than anywhere else (see Simpson, G.G. 1951. The story of the horse family in the modern world and through sixty million years of history. Oxford Univ. Press). This narrow-minded view of horse as well as burro evolution overlooks their deep ancestral histories, which, in the case of both species, occurred right here in North America, including the West. To this attest the fossil record and genetic analyses, among other lines of evidence (see MacPhee, Ross. Ph.D. 2013. The Wild Horse is Native to North America. This honest and direct statement by the Curator of the Division of Vertebrate Zoology, American Museum of Natural History, New York, can be read at <https://www.thecloudfoundation.org/reading-room-faq-s-article/wh-ret> ).

**In summary, we need to bear in mind certain crucial points:**

- (1) America’s wild horses and burros are legally protected on a relatively small fraction of the public lands, and the currently herd-occupied habitats (HMAs on BLM; Territories on USFS) are considerably less than their original 1971 legal areas (called Herd Areas – HAs on BLM). These amount to only ca. 12% of all public lands on which private livestock are permitted to graze, drink water, etc.
- (2) Privately owned livestock are allocated the great majority of the grazing resources on these public lands including within the legal habitats of the wild horses and burros, who are supposed to be the “principal” resource recipients within their legal habitats as per Section 2 c of the WFHBA.
- (3) Wild horses and wild burros are being managed at substandard population levels according to criteria for genetic viability in the wild (see Duncan, P. 1992. Zebras, Asses, and Horses: An Action Plan for the Conservation of Wild Equids. IUCN Species Survival Commission, Equid Specialist Group. Gland Switz., p. 5 for the recommendation of 2,500 individuals for a viable equid herd in the wild – much less than most such recommendations for other taxonomic groups).
- (4) Furthermore, land designated for wild horses and burros within the original legal areas has been and continues to be consistently reduced on BLM and US Forest Service lands. This amounts to tens of millions of acres, conservatively estimated at 22-million acres, though many objective researchers put this amount much higher (McDonald, C., op. cit. <https://americanherdsxtras.blogspot.com/2008/07/americas-mustangs-burros-whats-left.html> ).
- (5) The fact that BLM only plans to “manage for” wild horses and burros on 26.9 million acres out of the original legal Herd Areas amounting to at least 53.8 million acres (some researchers put this at 88-million acres or higher) indicates that already at least half of their legal habitats have been taken away from them along with their rights to freedom – quite often their very lives! (See Downer, CC. 2014. The Wild Horse Conspiracy. Pp. 225-229. <https://www.amazon.com/dp/1461068983>.)
- (6) America’s “national heritage” wild horses and burros are much more the sons and daughters of nature than the creations of humans. They benefit myriad plants and animals with which they have formed mutualistic relationships for, not just thousands, but millions of years including us “two-leggeds” and could do so to a much needed and greater degree today – if we would only learn how to justly share the land and freedom with them!

(7) Though I could describe additional points in my critique of the tendentious Feral Equids chapter, I believe I have revealed enough well-reasoned and substantiated points to justify a new, more thorough and more truthful account. This could be called “America’s Naturally Living, Positively Contributing, Returned Native Wild Horses and Burros” and be an update of my earlier peer-reviewed treatise (see [https://www.researchgate.net/publication/274006946\\_The\\_Horse\\_and\\_Burro...](https://www.researchgate.net/publication/274006946_The_Horse_and_Burro...) ). This would go – or, rather, gallop -- a long ways to open-up our society not only to achieving a healing restoration but an all-life-harmonizing progression as well.

(8) One immediate practical step would be to support and pass the “Voluntary Grazing Permit Retirement Act” legislation that would allow many of America’s targeted wild equid herds to be restored to genetically viable populations and to naturally fill their ecological niches and play their harmonious roles in commensurately complete and viable habitats. -- By getting their traditional biased enemies off of their, as well as Nature’s, back! (See Congress.gov. H.R. 6935 in last 117<sup>th</sup> Congress. First introduced by Rep. Adam Smith (D-WA) in House Com. of Natural Resources, referred to Subcom. on National Parks, Forests, and Public Lands – Tim Tiffany, office chair of Nat. Res. Subcom. Tel. (202) 225-5965 – ask this bill be reintroduced and that a hearing on it be held.)



Beautiful buckskin stallion and his white-blazed mare strike a captivating pose in the northern Pine Nut Mountain HMA on BLM land in western Nevada. Summer, 2014. Most of this very popular herd close to Carson City, Nevada’s Capitol, have now been unjustly removed. But the good news is that they can be restored! Copyright by Craig C. Downer.