

**STATEMENT OF CRAIG C. DOWNER, WILDLIFE ECOLOGIST FOR NEVADA STATE SAGEBRUSH ECOSYSTEM COUNCIL (SEC), FOR ITS MEETING ON FEBRUARY 22, 2024, IN CARSON CITY, NEVADA. PREPARED AND SUBMITTED PRESIDENTS' DAY, FEBRUARY 19, 2024, AND EMAILED TO KATHLEEN STEELE BEFORE 3 PM.**

ATTENTION: KATHLEEN STEELE, DIRECTOR SEC. EMAIL: [ksteele@sagebrusheco.nv.gov](mailto:ksteele@sagebrusheco.nv.gov)

PLEASE INCLUDE MY STATEMENT IN THE MINUTES OF THIS MEETING AND IF I AM NOT ABLE TO ATTEND, PLEASE READ TO EXTENT POSSIBLE AND DISTRIBUTE COPIES OF MY INPUT TO ALL COUNCIL MEMBERS. I WILL TRY TO ATTEND IN PERSON ON 2/22/2024 AT 8:30 AM.

CONTACTS: CRAIG C. DOWNER, WILD HORSE AND BURRO FUND/ANDEAN TAPIR FUND, P.O. BOX 456, MINDEN, NV 89423. EMAIL: [ccdowner@aol.com](mailto:ccdowner@aol.com).

The current presentation to SEC by Dr. Sherman Swanson entitled "Sustaining Land and Wild and Free-roaming Horses, and Burro Health" for consideration at the SEC meeting of 2-22-2024 along with the handout in the meeting agenda from Healthy Western Lands about the wild horses as well as Coalition for Healthy Nevada Lands' letter are very bold pronouncements that portray Nevada's wild horses and burros as destructive misfits that must be controlled and limited to the maximum, similarly to domestic livestock. These documents are very misleading and incomplete in their treatment of the subject.

Their points, pictures, and graphs are very tendentious in that they promote an agenda that portrays the naturally living horses and burros as destructive, invasive non-natives and proceed to fix the blame upon them for many of the region's most serious environmental problems. In my opinion as a professional wildlife ecologist, these claims have lost sight of the big picture and fail to consider the major environmental impact factors concerning the public lands that these wild equids inhabit as a legal right.

This aggressive "put-down" approach to Nevada's wild equids also concerns the rights of the majority of the General Public who support these national heritage animals and want to see them fairly treated under the provisions of the Wild Free-roaming Horse and Burro Act (WFHBA) and other related laws such as NEPA, ESA, Multiple Use, National Historical Heritage, Wilderness, Administrative Law, FLPMA, PRIA, etc., Acts. These people greatly treasure the wild equids who enhance their quality of life especially when living as befits their truer more complete natures – in the wild!

Some of the most serious omissions and partialities by the Swanson presentation, the Coalition letter and its handout involve:

(1) The failure to bring livestock ranching impacts into the equation and to recognize the relative proportions of livestock operations, including both cattle and sheep, upon the public lands in question. These include the effects of large-scale fencing partitioning of the public lands and its inhibition of the free-roaming lifestyles of the wild horses and burros as well as the manipulation of water and forage resources that cater primarily to the ranchers, or other public lands exploiters, and that deprives wildlife, including the wild equids, of their fair share of forage, water, shelter, and other habitat necessities required for their short- and long-term survival as well as harmonious habitat adaptation. Basically, these interests use the wild horses and burros as "scapegoats," or blame-takers, while seeking to divert the public's attention from the greater truth about what is happening upon the public lands. The Public Employees for Environmental Responsibility (PEER) along with other entities, and including the U.S.

Government Accountability Office (GAO see earlier reports) and the Congressional Research Service (CRS) have issued factual reports that contradict the lopsided report of Dr. Swanson and the assertions of the Coalition for Healthy Nevada Lands. These should be given all due consideration by the Sagebrush Ecosystem Council (see References).

(2) The Coalition's letter and handout and Swanson's presentation leave out the major positive contributions that wild horses and burros make to Nevada's and the West's ecosystems as well as to Nevadan and Western society. These seem to have deliberately ignored the substantial justifications for these equids' resuming their natural roles and filling their niches in the life community. One flagrant claim is that the horse species is non-native to North America! This is not a true claim, as it ignores sound paleontological, including fossil and genetic factual evidence as well as common sense observations concerning how little changed the North American horse species is from its descendants that occupied Eurasia and Africa and then were brought back to the Americas. I consider this a blunt attempt to discredit the horse as native North American wildlife, and a similar though not as pronounced a statement can be made for the burro species, whose ancestral origins as well as long duration of ancestral presence are also right here in North America, including Nevada (see ref. to my book, Ch. 1)

Actually, all the Perissodactyla Order of mammals, including the Horse Family: Equidae, and the Tapir and Rhino Families are pre-eminent gardeners of ecosystems that more greatly build healthy soils and disperse intact seeds of a great variety including many natives when compared to the more exclusively promoted cloven-hoofed, ruminant herbivores such as cattle, sheep, and big game cervids of the Artiodactyla Order of mammals. This has to do with their different digestive systems. It is uninformed to merely lump the mustangs and burros with ruminant livestock. So much of the above has to do with the post-gastric, cecal-fermenting, single stomach digestive system of the equids and their entire order, as contrasted with the pre-gastric, rumen-fermenting, multi-chamber digestion of cows, sheep, etc.

Another oversight is overlooking the history of overgrazing by the latter, particularly domesticated cattle and sheep when ascribing blame for overgrazing upon the wild horses and burros. And it is precisely these areas where government agencies, succumbing to pressures, tend to relegate the wild equids – contrary to their duty under the WFHBA! This is the case with some of the photos that are in the presentation of Dr. Swanson.

Scientific studies have proven that horses, burros, zebras, tapirs, rhinos, etc., actually provide a much-needed balance in ecosystems that are co-inhabited by cloven-hoofed, ruminant grazers (see Odadi & Rubenstein 2011 in Ref.). For this reason, the WFHBA does not lie when it states that wild horses and burros “contribute to the diversity of life forms within the nation ... enrich the lives of the American people ... [and justifiably] are an integral part of the natural system of public lands”.

In this regard, the SEC would do well to read an exhaustive study report indicating that horses can very justifiably be regarded as one of the very most suitable species for restoring degraded ecosystems throughout the world including in North America their evolutionary cradle and place of long-standing evolution (see Ref. link for A Geographic Assessment...). And it is also widely recognized that the return of the equids refills a missing seed-dispersal ecological role because many of the mid- to large-sized herbivores that performed this in the past have been hunted out or their habitats destroyed in the modern world (see Ripple et al. in Ref.). This proves their enhancement to biodiversity and ecosystem resilience – both critical factors in keeping life on Earth on an even keel in these precarious times!

(3) Based on past history, I believe that the presentation by Dr. Swanson, the handout, and the letter from the Coalition for Healthy Nevada Lands are not really about preserving truly healthy and genetically viable herds of wild horses and burros in Nevada. Rather, they are about absolutely minimizing these herds – and eliminating them altogether wherever possible – so as to accommodate prevailing monopolies on the public and associated lands. These include livestock, big game hunting, OHV, mining, energy, residential and agricultural land development, and other nature exploiters. The claim that further slashing, i.e., largely eliminating, Nevada’s wild horse and burro populations by 75% is necessary and for the good of the public land ecosystems and the wild horses and burros themselves while ignoring the real major factors – is outrageous! It is an attempt to whitewash what is, in fact, a plan to greatly cripple the wild horses and burros – to get them “out of the way” and to thwart their actually becoming truly thriving, well-integrated, naturally and freely living and roaming presences in Nevada and the West. This thinly disguised plan seeks to subvert the WFHBA’s true spirit and intent that is for the wild equids themselves and the public who appreciate them!.

(4) For the above and numerous related reasons, I urge the Sagebrush Ecosystem Council **to not endorse** the Coalition for Healthy Nevada Lands’ pretentious letter to the National BLM Director Tracy Stone-Manning. In urging an acceleration of wild horse and burro removals from their legal public land habitats, where they have already and in recent years been drastically reduced, this policy would terribly cripple the natural lifestyles, social cohesion, and ecosystem adaptation that have been generations in the making by these adaptable equids! By law in their legal habitats on BLM and US Forest Service lands, the mustangs and burros are supposed to be the principal presences and resource recipients, not shamelessly marginalized! This would be similar to what happened to America’s Native Americans who suffered the dire consequences of the egregious “broken treaties”. The major herd reductions clearly disrupt mature social structures of the equids as well as their natural, niche-filling processes that do in fact enhance the ecosystems they occupy, including the Sagebrush Steppe and habitats of the Greater Sage Grouse (see my reports in Ref.). And the wild horses and burros also combat Global Heating and often prevent catastrophic wildfires (see my study article in Ref.), as well as embellish Nevada and the West while and uplifting our spirits and the whole “vibe” of this amazing place!

(5) Self-stabilization and ecosystem enhancement including biodiversity when left to realize themselves would stabilize Nevada’s mustang and burro populations. These should be allowed to proceed and be coupled with an overarching and positive, wild-equid-valuing Reserve Design strategy, such as I propose as a professional wildlife ecologist who knew and worked with Wild Horse Annie. Along with many other compassionate people of nature-oriented progress, we believed and still do believe that this very progressive vision for humans learning to share the land and freedom with the horses and burros can be realized in America. So much that is truly good and life-saving, as opposed to life-destroying, depends on our doing just this! And this would truly “make America great again”!

I am a descendant of early Nevada pioneers from the mid-1800s and my ancestry traces back to the 1635 to the Puritans of New England. The latter allowed me to become the proud recipient of the Daughters of American Revolution Award for Excellence in American History when I graduated from Douglas County High School here in Nevada. On Presidents’ Day I have composed this input because I believe in Nevada and in America and in a greater realization of what life can be here, not just for us humans but for all the Great Rest of Life. Surely, we can learn to share the land and freedom with such wonderful species as the horses and burros, species that have done so much for us humans ... so, now, isn’t it high time we do something truly good for them?!

Do not hesitate in calling upon me for further input and collaboration to achieve a more just, equitable, and truthful treatment of Nevada's magnificent wild horses and wild burros. These are beings who and species that could do so much to enhance Nevada and in so many ways, provided we wake up to their great value and allow them to fill their great restorative and healing role here in our wonderful shared home.

Sincerely,

Craig C. Downer, Bachelors of Arts, Biology, spec: Ecology UC-Berkeley, Masters of Science, Biology, spec: Wildlife Ecology; Ph.D. Candidature, UDurham-UK. President: Andean Tapir Fund / Wild Horse and Burro Fund (a 501 c 3), P.O. Box 456, Minden, NV 89423. [ccdowner@aol.com](mailto:ccdowner@aol.com).

**References:**

<https://www.researchgate.net/publications/281822984> A Geographic Assessment of the Global Scope for Rewilding with Wild-Living Horses *Equus ferus*

Ripple, W.I. et al. Science May 2015. Collapse of the world's largest herbivores.

<http://advances.sciencemag.org/content/1/4/e1400103.full>

<https://thewildhorseconspiracy.org/documents/twin-peaks.pdf>. This field report for a major HMA with both mustangs and burros in both NV & CA contains photos substantiating my concerns.

<https://lrgaf.org/Endangeredmustangs.htm>. See my illustrated report.

<https://thewildhorseconspiracy.org/wp-content/uploads/2019/07/OBSERVATIONS-AND-ECOLOGICAL-EVALUATIONS-WILD-HORSE-BURRO-HERDS-AREAS-2016-2018-FINAL.pdf>

<https://thewildhorseconspiracy.org/marietta-burro-roundup-appealed/>

<https://thenevadaindependent.com/article/the-path-forward-for-the-restoration-of-wild-horses-and-burros-and-their-habitat/>

<https://www.researchgate.net/publication/274006946-The-Horse-and-Burro-as-Positively-Contributing-Returned-Natives-in-North-America>

<https://www.researchgate.net/publication/353317205> REPORT ON CARBON SEQUESTRATION BY HORSES BURROS AND THEIR ORDER

<https://www.researchgate.net/publication/353317432> REPORT ON WILD HORSE HERDS AND HABITATS IN WESTERN UTAH and EASTERN and CENTRAL NEVADA WITH FOCUS ON UTAHS SULPHUR and CONGER HERD MANAGEMENT AREA/

<https://renonr.com/2023/12/22/nevadas-wild-horses-and-burros-are-protected-by-law-and-are-not-ruining-public-lands/>

<https://www.amazon.com/dp/1461068983/> Author's 313-page illustrated book The Wild Horse Conspiracy – well-rounded covering legal, evolution, ecology, personal experiences with herds, plans for saving them through Reserve Design, interviews with early BLM Wild Horse & Burro Specialists, etc.

<https://thewildhorseconspiracy.org/establishment-disinformation-mustangs/>

<https://wp.me/p3Mpt6-zN> Craig's report on the Pine Nut Mountain Wild Horse Herd & Habitat on BLM land in western Nevada with photos, evaluation of 9 major ecological disturbance factors with table of relative assessment of severity.

<https://wildhoofbeats.com/podcast/wild-horses-livestock-public-lands-erik-molvar...>

<https://rewilding.org/rewilding-with-wild-horses/> This stresses their many positive contributions to ecosystems and gives proofs.

<https://peer.org/agency-records-paint-bleak-picture-of-western-landscapes>

Odadi, W. & D.I. Rubenstein. 2011 (Aug). Facilitation between Bovids and Equids on an African Savanna. *Evolutionary Ecology Research*. [https://www.researchgate.net/publication/239848265\\_Facilitation...](https://www.researchgate.net/publication/239848265_Facilitation...)

Vincent, Carol. 2009. Wild Horses and Burros report for the Congressional Research Service 7-57. At <https://www.crs.gov>