Americas Mustangs & Burros

What's Left,
The High Costs of Miscalculating
And Will They Survive?
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PART I

What's Left?
National Wild Horse & Burro Populations

I. Overview

Historical Population Reports

In Fiscal Year 2001, BLM launched their 4 Year Removal Initiative in an aggressive attempt to reduce reportedly expanding wild equid populations that were now posing serious environmental risks due to rangeland deterioration based almost exclusively on these population reports.

Yet prior to launching this initiative, historical examinations of removals often failed to reflect significant impacts to total national wild horse and burro populations in many of the fiscal years analyzed since 1992. There are strong indications that the figures used to justify this "overpopulation" were consistently inflated on an annual basis prior to its passage, a trend that appears to continue through the present day on both local and national levels.

For example, between 1992 and 1993, 8,545 wild horses and burros were removed and the total population was reported as being reduced from 54,804 to 46,462. In 1994, BLM reported removing even less wild horses and burros than the previous year, totaling 7,868, but populations were reported as still declining, now estimated at 42,410.

Yet in 1995, BLM reported removing 9,286 wild horses and burros, more than in the previous two years and though the starting base population was over 12,000 animals lower than the 1992 population, BLM reported national wild horse and burro populations actually increased to 43,593 instead of decreasing like the previous two years.

The same thing happened again in 1996 with 9,365 removals but the total remaining population reported was 42,138, only a 1,455 reduction and in 1997, BLM reported removing 10,443, over 24% of the total population but again, populations increased to 43,037 instead of decreasing as they should have.

From 1998 on, the numbers appear rather muddy and increases in total population levels could possibly be attributed to the 20% foaling rates being higher than the removal numbers and this is why BLM was losing ground. But just a few years ago, a 20% foaling rate was being reported by BLM as "high", unlike today when BLM states populations regularly increase at 20-25% (and often times more).

Additionally, those foaling rates only apply to a portion of the populations as a certain percentage are constantly being removed before foaling season and not contributing to population increases. It is not a static number that doubles every year because the removals are always reducing the reproduction rates of those still remaining on the range.

Furthermore, the foaling rate fails to consider the static wild horse and burro populations occurring between 1994-1997. Gathering around 10,000 p/year exceeded the 20% reproduction rate and numbers should have been going down but instead they were going up and those increases are what BLMs future populations were reported on and the basis of launching the Initiative – inflated numbers.

The same thing happened again beginning in 2001, where despite high removal numbers, national populations continued to stay static for the next few years.

BLM reported removing 13,277 wild horses in fiscal year 2001, equating to 29.20% of the population - this removal rate yielded a reduction in wild equid populations by 6,654 by 2002.

In 2002, BLM reported removing 12,029 additional wild equids, now equating to even a higher percentage of the total population, 30.99%, yet populations stayed relatively static with only a 1,629 reduction to reported national totals.

Also noteworthy is in BLMs 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table, though BLM had been including the percentage of the total population their annual removals were comprised of since 1971, in 2002, BLM stopped reporting those percentages.

In 2003, BLM reported removing 10,081 additional wild equids, equating to 25.98% of the total population, yet national populations only declined by a mere 51 animals.

This brief summary of reported removals and populations is not entirely accurate in its presentation. It is only included here to show a general overview of the number of removals and percentage of populations that appeared to make relatively little impact on reducing wild equids populations as a whole.

This "inaccuracy" is accounted for later and is due to the fact that BLM has two separate cycles of reported numbers issued at different times of the year. Because these two sets of numbers overlap each other, they will be explained, analyzed and accounted for in detail in the Population Analysis & Methodology section of this report.

Noted discrepancies were also found in BLMs FY1999 wild horse and burro removals numbers as well as in FY2000 reported total populations in the originally published documents versus the newly published 2007 Herd Statistics. (See Appendix I)

BLM Reported Removal History 1992-2008

The following table is comprised of population and removal numbers reported by BLM published in the 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table available at: http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros.Par.54130.File.dat/Wild%20Horse%20and%20Burro%20Removal%2071-07.pdf

Table 1. BLM Reported Wild Horse & Burros Populations & Removals: 1992-2007

Year	Total Pop.	WH Pop.	Burro Pop.	Total Removals	WH Removals	Burro Removals
1992	54,804	46,501	8,303	6,663	5,806	857
1993	46,462	38,962	7,500	8,545	6,947	1,598
1994	42,410	33,659	8,751	7,868	7,073	795
1995	43,593	35,588	8,005	9,286	7,355	1,931
1996	42,138	35,286	6,852	9,365	7,369	1,996
1997	43,037	37,615	5,422	10,443	8,337	2,106
1998	44,495	39,470	5,025	6,389	5,983	406
1999	45,968	40,705	5,263	6,004	4,950	1,054
2000	47,376	42,113	5,263	8,631	7,004	1,627
2001	45,469	39,815	5,654	13,277	11,764	1,513
2002	38,815	34,496	4,319	12,029	10,822	1,207
2003	37,186	32,145	5,041	10,081	8,865	1,216
2004	37,135	32,290	4,845	9,899	9,252	647
2005	31,760	27,369	4,391	11,023*	10,650	373
2006	31,201	27,593	3,613	10,399*	8,789	768 = 9,557
2007	28,898	26,024	2,874	7,726*	6,626	1,100

*These numbers included removals from USFS Wild Horse Territories. BLM has reported the following breakdown of USFS total removals but no individual populations were provided for wild horses and burros separately. The following breakdown is based exclusively on reported numbers by BLM via this report. Some of these numbers failed to be substantiated in other documents.

Table 2. BLM and U.S. Forest Service Removals 2005-2007

Fiscal Year	Total Removals	USFS Removals	Actual Removals from BLM Managed Populations
2005	11,023	777	10,246
2006	10,399*	245	10,154
2007	7,726	737**	6,989

* Several discrepancies have been noted regarding a variety of population reports for 2006. Due to this, an in depth examination of removal numbers has been provided between BLMs 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table for Fiscal Year 2006, Table 5-13 Wild Free-Roaming Horse and Burro Removal and Adoption By Office, Fiscal Year 2006 and the 2006 Final Gather Schedule removal numbers.

**Significant discrepancies were noted in USFS removals in the 2007 Gather Schedules.

TABLE 5-13. WILD FREE-ROAMING HORSE AND BURRO REMOVAL AND ADOPTION BY OFFICE, FISCAL YEAR 2006

ADMINISTRATIVE OFFICE /A/	ANIMALS ADOPTED				ANIMALS REMOVED	
	FY 1971 - FY 2005		FY 2006		FY 2006	
	Horses	*Burros*	*Horses*	*Burros*	*Horses*	*Burros*
Arizona	3,074	2,822	198	79	0	192
California /b/	17,144	6,109	617	191	1,355	72
Colorado	6,381	779	202	20	278	0
Eastern States /b/	55,734	14,227	1,420	178	0	0
Idaho	4,043	293	12	0	1	0
Montana /b/	9,813	1,274	57	6	19	0
Nevada	3,864	283	71	4	3,876	873
New Mexico /b/	18,968	3,861	930	90	5	0
Oregon /b/	13,076	1,324	294	0	1,006	0
Utah	5,395	390	175	54	628	0
Wyoming /b/	16,055	1,124	217	14	1,621	0
Natl. Program Office	20,958	1,071	211	132	0	0
Total	**174,505**	**33,557**	**4,404**	**768**	**8,789**	**1,137**
Total Adopted, Fiscal Years 1971 through 2005:			**208,062**			
Total Adopted, Fiscal Year 2006:			**5,172**			
Total Removed, Fiscal Year 2006:			**9,926**			

/c/ These numbers include 245 animals removed from Forest Service territories; 86 in California; 6 in Montana; 3 in New Mexico; 136 in Nevada; 12 in Oregon; and 2 in Utah.

This document is also available at:
http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/public_land_stats/1997.Par.77655.File.dat/PLS%2006%20table%205-13.doc

2006 Removals & Discrepancies

In the 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table, BLM reports 10,399 removals for Fiscal Year 2006 but the individually reported removals only add up to 9,557. If USFS removals are added to the individual population total of 9,557, total removals only increase to 9,802, not 10,399 as is being reported.

As provided in the previous chart, Table 5-12, Wild Free-Roaming Horse and Burro Removal and Adoption By Office, Fiscal Year 2006 reports, BLM reports removing 1,137 burros, not 768 as reported in the 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table, indicating a difference of 369. When these additional burro removals are added to the individual totals and USFS removals, removals still only total 10,171, not 10,399.

Additionally, the 2006 Final Gather Schedule reported removing 10,323 total animals, not 10,399, wild horse removals totaled 9,187 in the Gather Schedule not 8,789 as is reported in the National statistics, the Gather Schedule reported 1,139 wild burro removals versus 1,137 and the 2006 Gather Schedule only reported 222 animals removed from USFS Wild Horse Territories, not 245.

With respect to USFS removals alone, BLM reported 86 animals were removed from California but the 2006 Final Gather Schedule only reports 76, wild horses removals were reported as totaling 32 from New Mexico USFS Wild Horse Territories in the Gather Schedule but BLM only reported 3 were removed in the 2006 Removals & Adoptions Table, 136 USFS animals were reported as being removed in Nevada in the 2006 Removals & Adoptions Table while the 2006 Final Gather Schedule only reports 103, Oregon USFS removals were reported as 12 but the Gather Schedule reports 11 and while BLM cites removals for USFS as 6 in Montana and 2 in Utah, the Gather Schedule failed to report any removals for USFS in these states at all.

As for wild burro populations, the 2006 Final Gather Schedule reported removing 22 wild burros from California while BLMs 2006 Adoption & Removal Table reported removing 72. The 2006 Gather Schedule reported 244 wild burros removed from Arizona while the 2006 Removal & Adoption Table reported only 192 and finally, the 2006 Final Gather Schedule reported removing 895 wild burros from Nevada while the 2006 Removal & Adoption Table reported removing 873.

Because of other numerous noted discrepancies in wild horse removals, the following chart has been provided to illustrate the differences in reported removals per individual state.

Table 4. 2006 State Wild Horse Removals and Discrepancies

State	2006 Final Gather Schedule Reported Removals	2006 Removals & Adoptions Reported Removals
Oregon	960	1,006
California	1,389	1,355
Colorado	318	278
Nevada	4,171	3,876
Utah	622	628
Wyoming	1,673	1,621

2007 Removals and Discrepancies
Discrepancies were also noted between BLMs 2007 Final Gather Schedule, which only reported removing 7,365, which included USFS animals versus the nationally reported removals of 7,726 for fiscal year 2007.

With respect to removals conducted for USFS in fiscal year 2007, extreme discrepancies were also noted between BLMs Preliminary 2007 Gather Schedule and the Final 2007 Gather Schedule regarding USFS Wild Horse Territories.

Based on expected USFS gathers compared to actual gathers, only 275 were reported as removed. However, BLM conducted removals in January 2007 of the co-managed areas of the Johnnie HMA/WHT, the Wheeler Pass HMA, the Spring Mountain WHT and the Red Rock HMA/WHT totaling 864 wild horses and burros. No separation of HMA and WHT populations were provided but the total removals, in addition to the previous 275, equaled 1,139. BLM national statistics reported 737 animals were removed for USFS in fiscal year 2007.

II. Population Analysis and Methodology

BLM Reporting Methods
Throughout most of the history of the Wild Horse and Burro Program, BLM has reported all national wild horse and burro populations as of September 30th, which is the end of each fiscal year and is a result of their governmental obligations to adhere to fiscal year funding cycles as well as the requirement to submit relevant reports, data, and statistics.

However, fiscal year cycles do not correspond with wild horse and burro reproductive cycles and this method of reporting left much to be desired in terms of accuracy in relation to reproduction increases, gather operation impacts and estimating total populations.

In order to provide a better "snapshot" of actual populations, beginning in fiscal year 2001, BLM stopped reporting national populations as of September 30th and instead began reporting wild horse and burro populations as of February 28th of each fiscal year prior to the foaling season.

In theory, this change in reporting total populations greatly improved BLMs ability to accurately project population numbers, foaling increases and impacts of removals throughout the course of wild horse and burro reproduction cycles in relation to fiscal year statistics.

Prior to its implementation, the ability to track, estimate and project numbers and statistics within the program were almost futile. The most significant factor that prohibited proper population estimations was BLMs inability to separate wild horse and burro removals from the remaining population prior to foaling season. Having a reasonably accurate count of the population before adding the standard 20% foaling increase was imperative in determining just how significantly the population actually increased and how many removals would then be necessary to either achieve or maintain the national Allowable Management Level (AML).

Beginning Analysis
As a result of this change in reporting techniques, only five months transpired between the reported populations of fiscal year 2000 and 2001; Fiscal Year 2000 populations were reported on 9/30/00 and Fiscal Year 2001 populations were reported on 2/28/01.

Two different total population numbers have been reported by BLM as of 9/30/00. Their newest reports, which provide a complete history of the Wild Horse and Burro Programs statistics since 1971, now published for fiscal years 2006 and 2007, both report a total population of 47,376 wild horses and burros as of 9/30/00 while an earlier FY2000 report had cited a total population of 48,624 as of 9/30/00, 1,248 more than is now being reported.

Due to this discrepancy, it was hoped that the newest population estimates were a result of BLM being able to more accurately gauge population estimates with better reporting techniques and therefore, the total reported population of 47,376 has been used in this analysis.

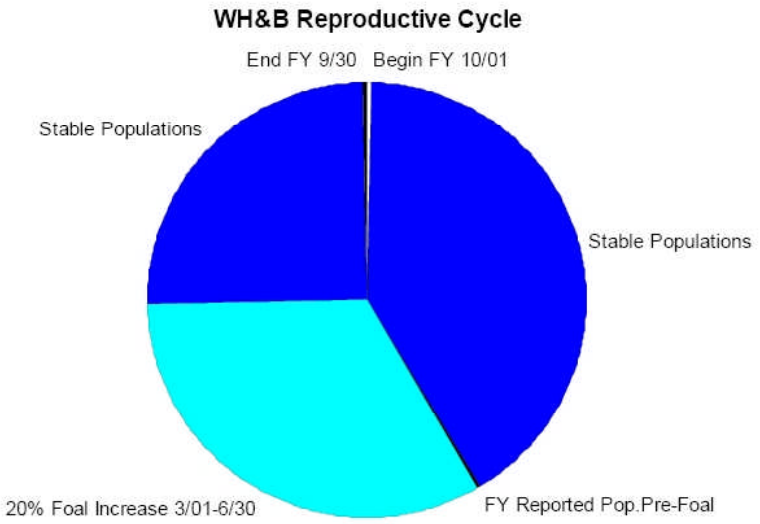
In order to begin an examination as to the accuracy of reported remaining national wild horse and burro populations, a base population was necessary to provide a starting point to analyze BLM statistics. The base population used was the reported populations as of 9/30/00 of 47,376 and all subsequent reported fiscal year removals, foaling rates and total populations reported from this point on were applied to this base number.

Reproduction Rates
The issue of accurate reproduction rates in wild equid populations is just as contentious as most issues about wild horses and burros. While the debate continues as to true wild equid reproduction rates, BLM uses a 20% standard for both wild horses and burros. While it may or may not accurately reflect actual recruitment rates, since this is the rate BLM applies towards their own population projections, this is the reproduction rate that must be used in order to uniformly apply BLMs own statistics to wild horse and burro populations increases and declines.

Statistical Cycles
BLM uses two cycles in reporting and determining wild horse and burro populations. The first cycle is based on the reproductive cycles of the wild horses. Essentially, wild horse populations remain relatively stable through out the course of the year, except during March 1 through June 20, which is considered the "peak foaling season" were the bulk of wild horses foal.

A chart has been provided to help illustrate wild horse reproductive cycles in relation to BLM fiscal year cycles as seen in Table 5.

Table 5. Wild Horse Reproductive Cycle



The second cycle is based on fiscal year cycles, which is necessary due to funding issues and government required reports, data and statistics. In order to make these two cycles connect for accurate population estimates, they were divided into the following categories, which begin on October 1st at the start of each fiscal year and end on September 30th of each fiscal year.

The Fiscal Year categories are as follows:

1. Pre-Foaling Population: This category reflects activities that occur from the start of the fiscal year on October 1st through February 28th, when BLM calculates and reports annual national population estimates. This category is necessary so that removals conducted prior to foaling season can be appropriately accounted for and prevents inflated reproduction rates being applied to wild horses and burros that are not actually contributing to reproductive cycles or population increases on the range because of their removals.

2. Foaling Increases: This category reflects the foaling season where no gathers occur between March 1 and June 30 of each year. The exception to this is wild burros are reported by BLM as foaling year-round, therefore BLM often conducts removals of wild burros during the normal foaling season for wild horses. Any removals of wild burros during this time frame are applied to the second half of the fiscal years removal statistics. BLMs standard of projecting a 20% population increase has been utilized in every analysis.

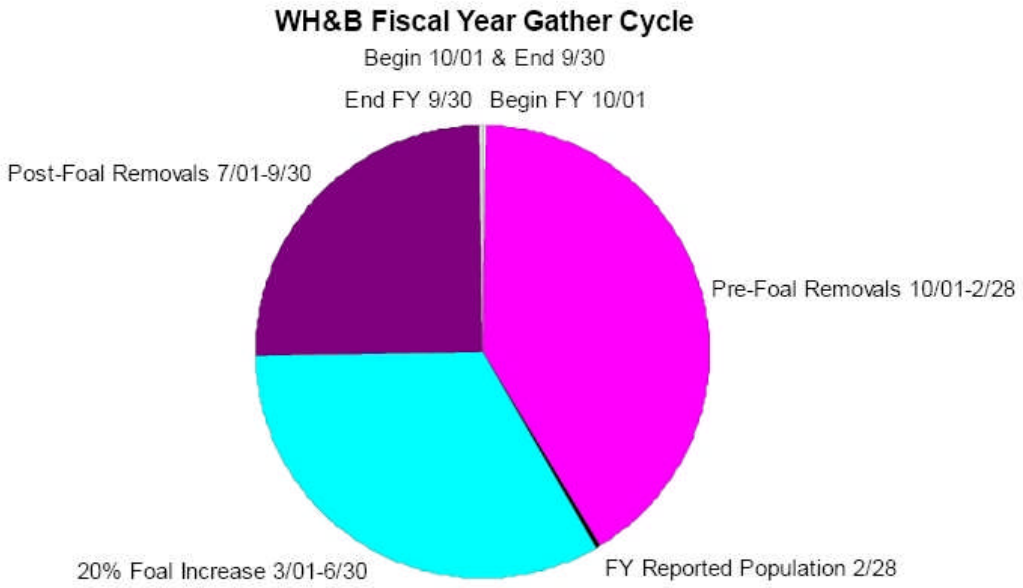
3. Post-Foaling Populations: This category reflects a 20% increase to the total populations reported on February 28th of each year and is considered completed as of July 1st.

4. Post-Foaling Removals: This category reflects removals as a result of gather operations conducted between July 1st and September 30th of each fiscal year.

5. End of Fiscal Year Populations: This category reflects impacts of removals to total populations due to removals that occur between July 1st and September 30th. A population estimate is necessary at this juncture due to BLM being required to begin a new fiscal year gather cycle and schedule with a new set of removal numbers that begin again on October 1st. In addition to the snapshot of populations reported on February 28th, it is necessary to also take this "snapshot" to determine the results of the removals that occurred over the course of the fiscal year so that the new fiscal year numbers may then be applied beginning again on October 1st.

Table 6 helps illustrate how the fiscal year cycles work in relation to removals, reproduction and estimated wild horse and burro populations.

Table 6. Wild Horse & Burro Fiscal Year Gather Cycle



Methodology

The first method applied to accurately gauge actual population status is recognizing that fiscal year gather cycles conduct removals on wild horse and burro populations before they are actually reported on February 28th of each year.

BLMs removals are scheduled in two distinct time frames defined as summer and winter removals. The winter removal cycle begins on October 1st of each fiscal year and continues through February 28th when operations are halted to allow for wild horse foaling season. After foaling season, removals resume as of July 1st and continue through September 30th, the end of each fiscal year with this time period considered the summer gather cycle.

To begin analysis, each annual population estimate begins with the reported removals for that fiscal year, October 1st through September 30th.

All fiscal year removal numbers were taken from BLMs 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table except the fiscal years 2006, 2007 and 2008 when BLM Gather Schedules were available. These were used instead of the nationally reported statistics because actual removals reported by BLM between the pre-foal winter removals and the post-foal summer cycles could be accurately applied.

Therefore, the following exceptions should be noted:

a) The 2006 Final Gather Schedule removals of 10,323 were substituted for the nationally reported removals of 10,399 and the 222 USFS removals were applied from the 2006 Final Gather Schedule versus the nationally reported statistics of 245.

b) The 2007 Final Gather Schedule removals of 7,365 were substituted for the nationally reported removals of 7,726. Using the Gather Schedule removals numbers also allows for a higher project population than BLMs because less removals have been applied in analysis. Due to the extreme discrepancies noted in USFS Wild Horse Territory removals as mentioned earlier, no deductions were made to account for these populations. As no report or potential alternatives provided a removal number anywhere close to the 737 reported in the national statistics, no adjustments were made and the total removals of 7,365 were applied.

c) The 2008 removals were extracted from BLMs 2008 Winter Gather Schedule report as presented to the National Wild Horse & Burro Advisory Board at their February 25, 2008 meeting in Tuscon, Arizona.

The next step was to deduct removals reported by BLM as taken from USFS Wild Horse Territories through the fiscal years of 2005 and 2006 to isolate BLM managed populations and removal impacts to exclusively BLM populations as illustrated by the following table.

Table 7. BLM Wild Horse & Burro Populations
National Removals 2001-2008

Fiscal Year	Total WH&B Removals	USFS Removals	Actual BLM Managed Removals
2001	13,227	N/A	13,227
2002	12,029	N/A	12,029
2003	10,081	N/A	10,081
2004	9,899	N/A	9,899
2005	11,023	777	10,246
2006	10,323	222	10,101
2007	7,365	N/A	7,365
2008*	3,363		

*Removals reported via winter 2008 Gather Schedule to National WH&B Advisory Board 2/25/08.

These reported removals for the entire fiscal year were then divided and applied in various percentages to the wild horse and burro reproductive cycles. Different ratios were analyzed of removals to the pre-foaling season populations expressed as percentages of the years total reported removals such as a 50/50 removal rate, 40/60 removal rate and a 30/70 removal rate.

In order to accurately gauge how removals are impacting reproduction rates, it is necessary to apply each year's removals to a portion of the total populations before they foal. This prevents inflated reproduction rates being projected for wild populations that have already been removed.

Incorporating this method ensures that populations already removed and no longer contributing to population increases are properly accounted for and reasonably reflect actual impacts to population totals throughout BLMs winter and summer gather cycles.

Here is an example to help illustrate how this method works and the different ratios applied, which consequently produce different outcomes.

If BLM removed 10,000 wild horses and burros throughout a fiscal year, not all 10,000 removals occurred after foaling season. Some removals occurred prior to foaling season and some occurred after foaling season with those removed during the pre-foaling season no longer contributing to population increases.

When applying the three different ratios, the 50/50 analysis projected half of the populations were removed before foaling season known as the "winter removals" in BLMs gather schedules while half of the populations were removed after foaling season known as their "summer removals". Therefore, the actual breakdown of a 50/50 ratio would be: 5,000 wild horses and burros would be removed before they foaled and 5,000 after foaling.

The same method using the 40/60 analysis would project only 40% of the years removals being conducted before foaling season with the other 60% being applied after foaling season or 4,000 were removed prior to February 28th of that fiscal year and 6,000 were removed after foaling season between July 1st and September 30th

The 30/70 analysis projects only 30% of the population removed prior to foaling season, or merely 3,000 wild horses and burros with the remaining 7,000 removed post-foaling season.

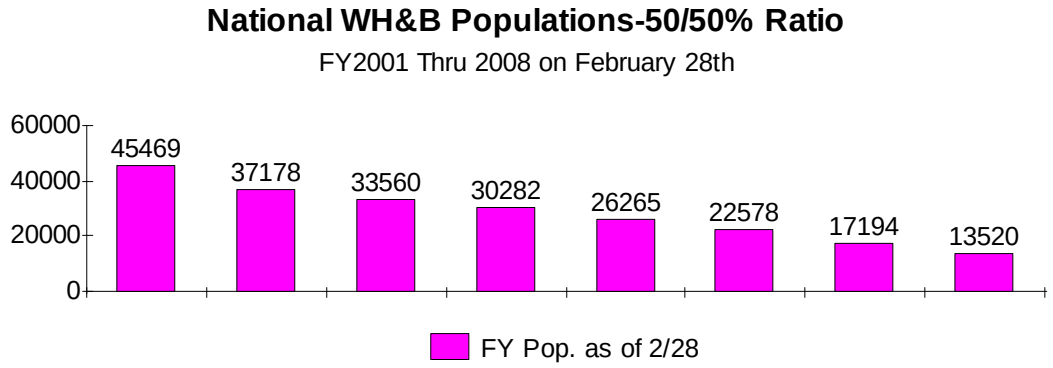
The obvious effects of applying these different ratios towards the pre-foaling population are different rates of population increases. Here are the results of applying each these ratios to the post-foaling populations beginning in July 2001, the first year of BLMs new population reporting cycle on February 28th and concluding on July 1st, 2008.

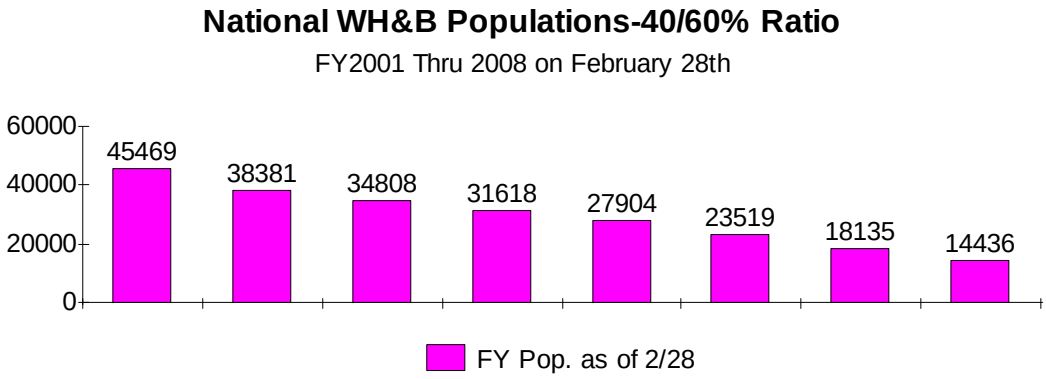
However, it must be noted that while ratio removals were analyzed as percentage projections of 50/50, 30/60 and 30/70 in the years 2002 through 2005, the exact numbers of winter and summer removals were applied in 2001 as provided by BLMs reported removals, which resulted in the starting base population as well as exact removals were applied in the years 2006, 2007 and 2008 as reported by BLM Gather Schedules.

Since exact removal ratios as reported by BLM were incorporated in all three analysis for the most accurate projections possible, the projection methods of the 50/50%, 40/60%, 30/70% ratios only actually applied to four years of this analysis, these being fiscal years 2002, 2003, 2004 and 2005.

The following graphs illustrate projected populations through independent analysis applying the three different removal ratios for the same reporting dates BLM uses to report national populations on February 28th of each fiscal year.

Table 8. Removal Ratios/National Wild Horse and Burro Populations-February 28th





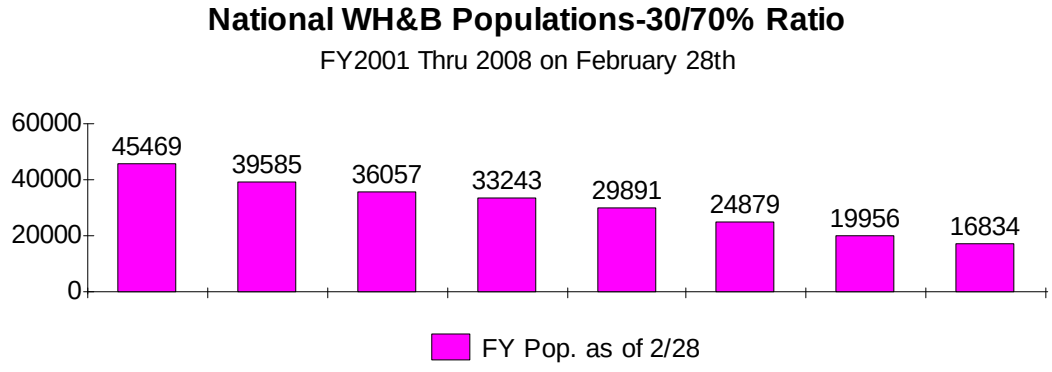
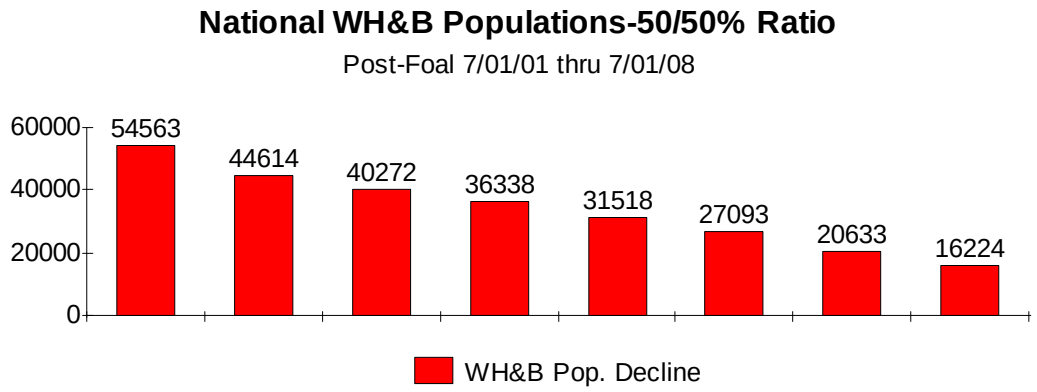
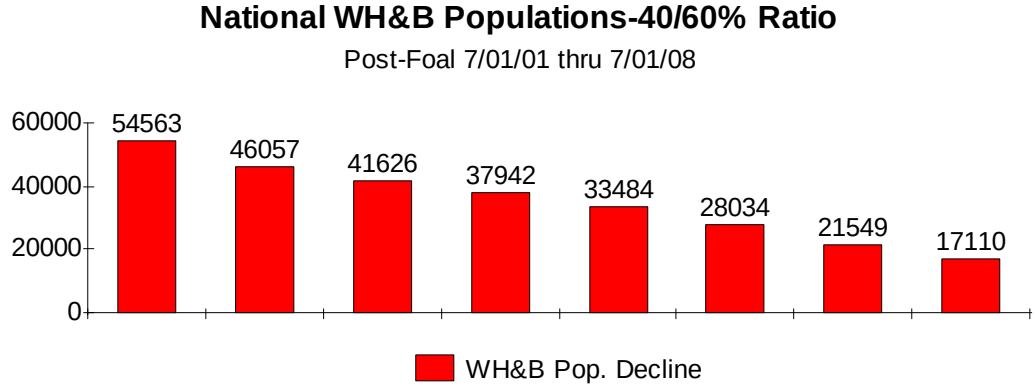
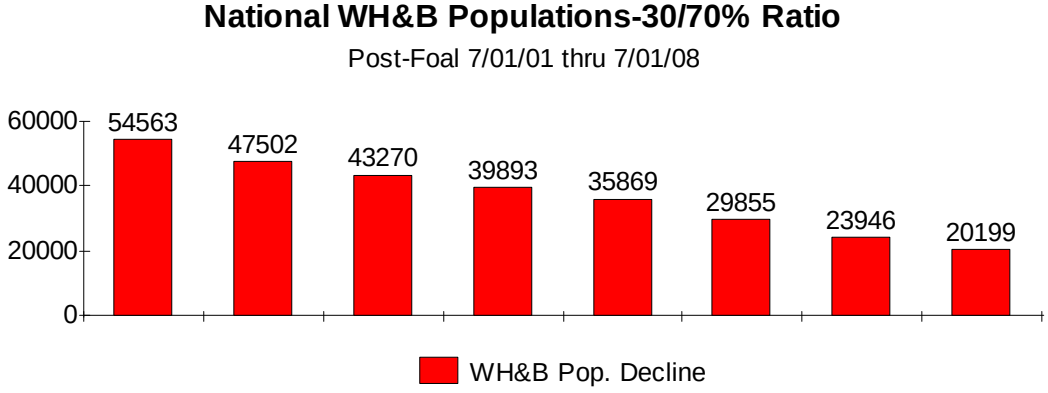


Table 9 reflects wild horse and burro population levels after foaling season considered concluded on July 1st of each fiscal year, according to the three applied removal ratios. The estimated current population as of July 1, 2008 is approximately 16,000 wild horses and burros.

Table 9. Removal Ratios/National Wild Horse and Burro Populations-July 1st







The second method applied is an alternative national population "snapshot" on September 30th at the end of each fiscal year. This provides a necessary assessment of the post-foaling summer removals in relation to the fiscal year gather schedules as well as providing a base population to calculate the next fiscal year gather cycle beginning October 1st.

The third method applied was to account for BLMs change of reporting dates for wild horse and burro populations between the end of fiscal year 2000 on September 30th and the new reporting date based on wild horse and burro reproduction cycles as of February 28th, which began five months later on February 28th, 2001.

The starting base population was calculated by first subtracting the reported population on February 28, 2001 from the reported population of September 30, 2000 to determine the amount of removals BLM had done prior to the February 28, 2001 reported populations. Then the difference between these two populations was subtracted from the total reported removals for fiscal year 2001 with the remaining removals applied to the post-foaling populations.

Specifically, BLM reported removing 13,277 wild horses and burros in FY 2001, which began on October 1, 2000 and concluded on September 30, 2001. As of September 30th, BLM reported 47,376 wild horses and burros on public lands. By February 28, 2001, total wild horse and burro populations had been reduced to 45,469, a difference of 1,907. This then became the number for how many wild horses and burros BLM removed during this five-month transition period known as the "winter" gathers.

This difference of 1,907 was then subtracted from BLMs total reported removals for fiscal year 2001 of 13,277 wild horses and burros with the remaining 11,370 removals being applied to the post-foaling population gather cycle between 7/01/01 and 9/30/01.

It is recognized that using BLMs reported removals of only 1,907 wild horses and burros between 10/01/00 and 2/28/01 most likely reflects an error in BLM reporting statistics. The chances of less than 2,000 being removed over a five-month period while over 11,000 were removed in three-month period are remote. Additionally, applying this method causes the reproductive foaling rate to become highly inflated with a 20% increase being applied to a significantly greater portion of the total populations that had most likely been reduced to lower levels than this before BLMs February 28, 2001 reporting date.

However, a base point must be utilized somewhere and according to BLM reports, these populations were suppose to be reasonably accurate when they reported them on 9/30/00 and 2/28/01 and as such, they become the starting point for this analysis, whether accurately reported by BLM or not.

Once the starting population base was determined, no other effort was made to "match" reported populations in this analysis with BLMs reported populations each February 28th of the fiscal years analyzed. However, exact winter/summer removals numbers were incorporated as reported by BLMs 2006, 2007 and 2008 Gather Schedules.

The intent is to provide independent results through the application of BLMs own methods to determine an objective count based on their own fiscal year cycles, projected reproduction rates and reported removals.

III. INDEPENDENT ANALYSIS

Though three different removal ratios were analyzed, due to a wide variety of factors including a high potential for inflated populations during much of the 1990's, the minimal removals reported between September 30th, 2000 and February 28th, 2001, which in turn may have caused excessively high reproduction projections in 2001, the consistent application of BLMs "high" reproduction rate of 20%, the relatively static wild horse and burro populations between 2002-2004, the inclusion of wild burro populations contributing to reproduction rates even when they were often being removed and the introduction of fertility control on many of the wild horse herds over the last several years, it is believed that the 50/50% ratio is most likely to best reflect the actual populations still remaining on public lands.

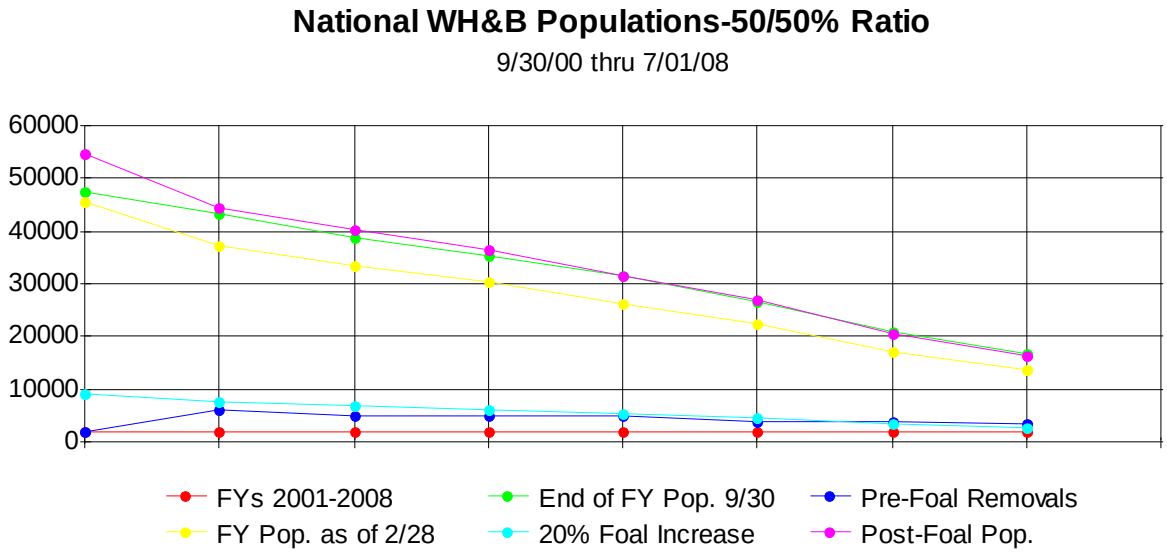
Based of this conclusion, an in depth analysis of the 50/50% Ratio results has been provided for detailed evaluation of trends and population declines.

Results of Applied Methodology –50/50% Ratio

Despite starting with a base population that appeared highly inflated with skewed data, consistent application of fiscal year gather cycles and 20% foaling rates indicate that the total remaining wild horse and burro populations as of July 1, 2008 now number approximately 16,224 animals. If the BLM successfully removes every wild horse and burro currently scheduled in their fiscal year 2008 Gather Schedule, approximately 13,687 of both species will remain in BLM managed lands.

The following graph illustrates population declines based on reported removals between 9/30/00 through 2/28/08 and while it does include projected foaling increases in 2008, it does not include *potential* removals between 3/01/08 and 9/30/08.

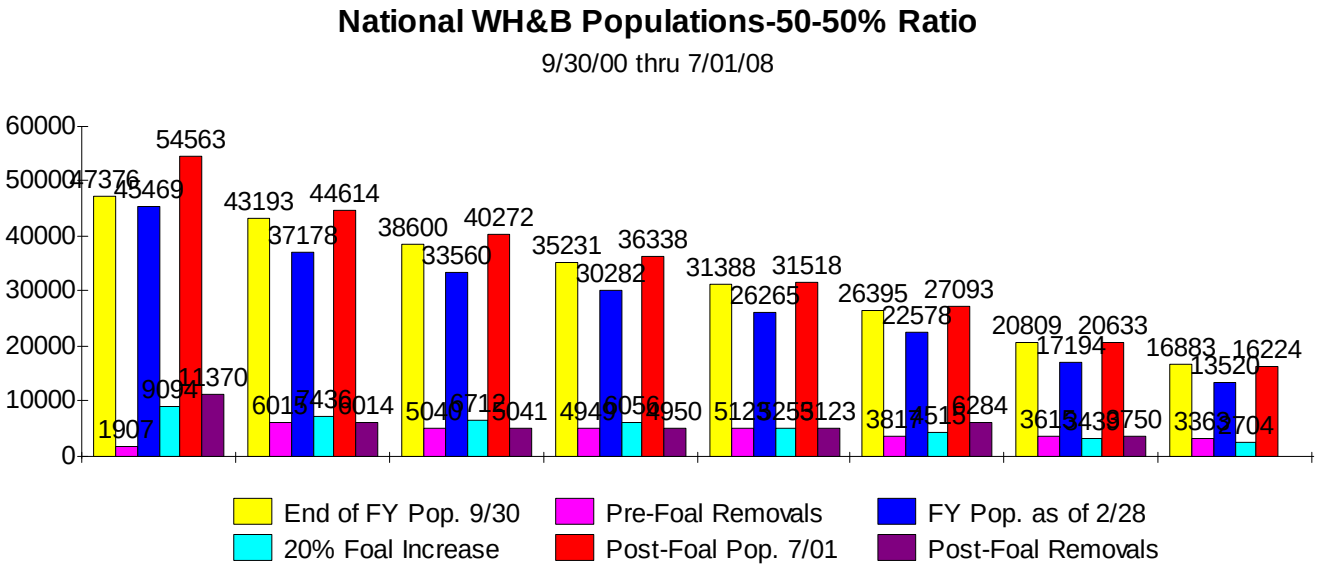
Table 10. National Wild Horse and Burro Population Decline 2000-2008



The annual progression of fiscal year and reproductive cycles were applied each year, starting with the end of fiscal year 2000 9/30/00 base population through projected foaling increases as of 7/01/08.

The following chart illustrates the results of each category through this progression; End of Fiscal Year projected populations on 9/30 of each year, Pre-Foaling removals between 10/01 and 2/28 of each year, reported fiscal year populations as of 2/28 of each year, 20% Foaling Increases between 3/01 and 6/30 of each year and finally, the Post-Foaling removals conducted between 7/01 and 9/30 of each year.

Table 11. National Wild Horse and Burro Population Annual Cycles – Fiscal Year 2000-2008



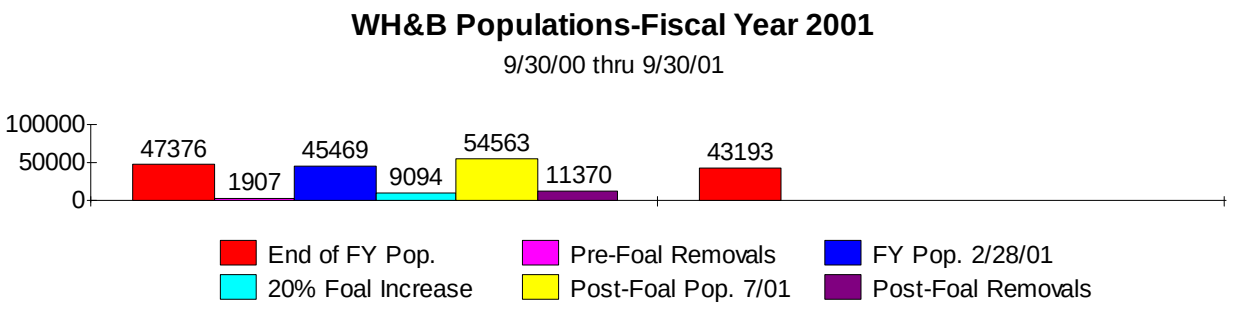
Annual Cycles: 2000-2008

As already mentioned, the following methodology was used to determine an independent analysis of remaining wild horse and burro populations based on BLMs reported removals and the standard 20% foaling rate. Half of each years' removals were subtracted during the Pre-Foaling population and half of each years removals were applied to the Post-Foaling season population. This method also allowed for wild burro populations, though generally small in number, to be included in the foaling increase projections even though often times they were being removed and did not actually contribute to the total population increases.

The annual cycles of applying this calculation method yielded the following results. The only numbers used in this analysis that demanded correlation with BLM reports were the starting base population reported on 2/28/01 and the fiscal year removals reported by BLM. No other effort was made to "match" reported populations in this independent analysis with BLMs reported remaining populations each February 28th of the fiscal years.

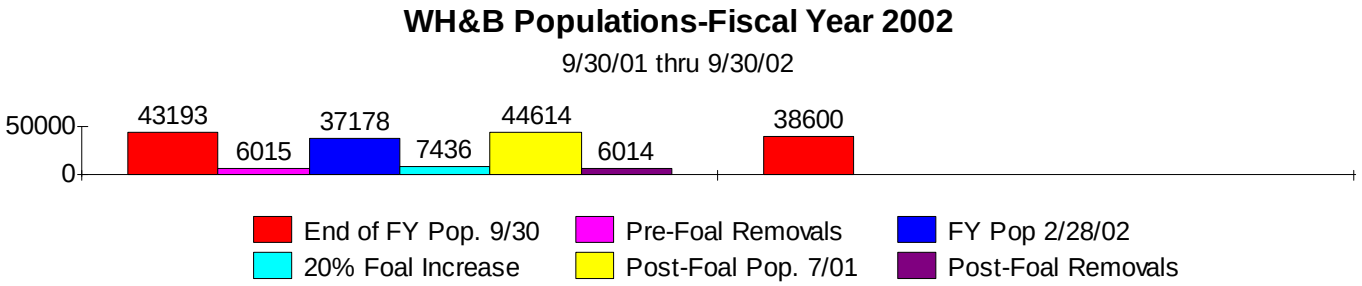
However, exact winter/summer removals numbers were incorporated as reported by BLMs 2006, 2007 and 2008 Gather Schedules minus USFS removals for 2005 and 2006.

FISCAL YEAR ANALYSIS BY YEAR
50/50% Removal Ratio



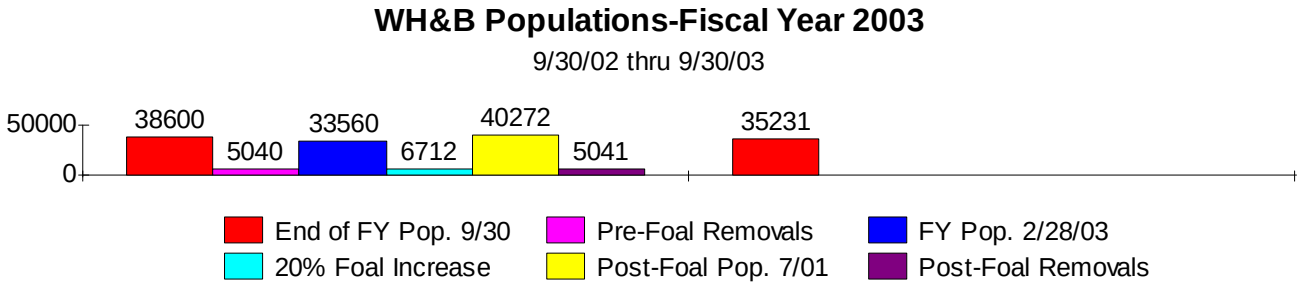
Fiscal Year 2001
10/01/00 thru 9/30/01
FY01 Total Removals 13,277

FY00 Population 9/30/00	47,376
FY01 Population 2/28/01	45,469
Difference	1,907
Removals between 10/01/00 and 2/28/01	1,907
FY01 Total Removals	13,277
Removals Applied to Post-Foaling Pop. 7/01/01 thru 9/30/01	11,370
Population as of 2/28/01	45,469
20% Foaling Increase 3/01/01 thru 6/30/01	9,094
Post-Foaling Population 7/01/01	54,563
Post-Foal Removals 7/01/01 thru 9/30/01	11,370
Remaining Population on 9/30/01	43,193



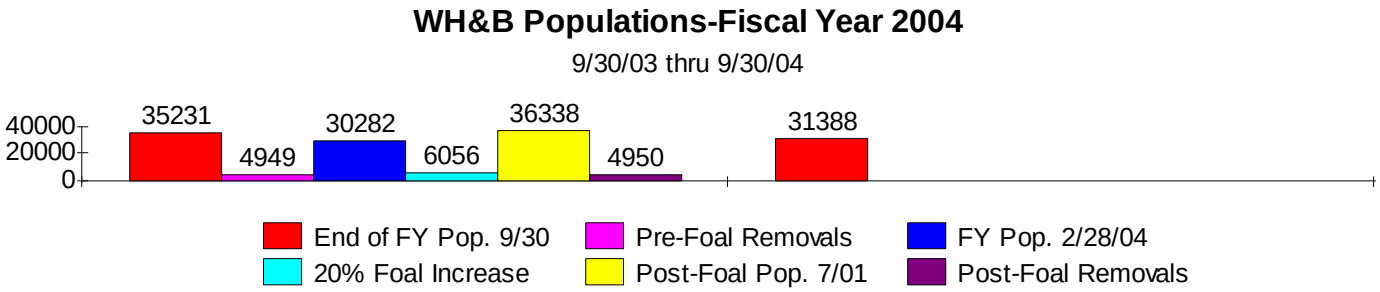
Fiscal Year 2002
10/01/01 thru 9/30/02
FY02 Total Removals 12,029

FY01 Population 9/30/01	43,193
Removals between 10/01/01 and 2/28/02	6,015
Population as of 2/28/02	37,178
20% Foaling Increase 3/01/02 thru 6/30/02	7,436
Post-Foaling Population 7/01/02	44,614
Post-Foal Removals 7/01/02 thru 9/30/02	6,014
Remaining Population on 9/30/02	38,600



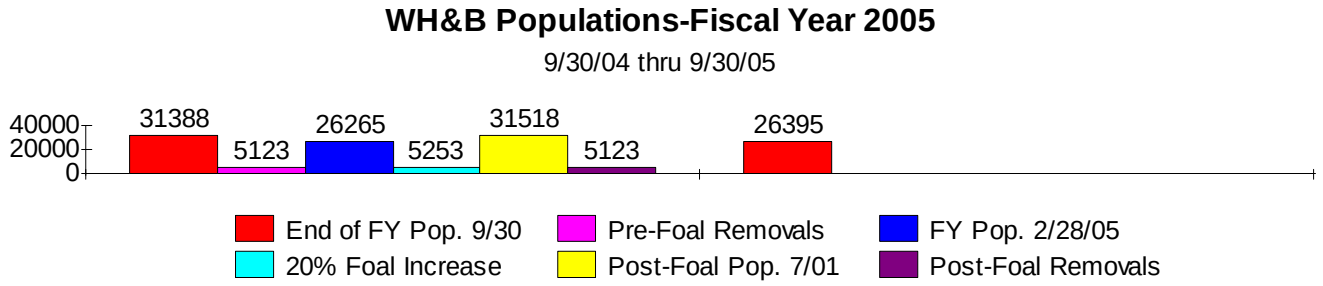
Fiscal Year 2003
10/01/02 thru 9/30/03
FY03 Total Removals 10,081

FY02 Population 9/30/02	38,600
Removals between 10/01/02 and 2/28/03	5,040
Population as of 2/28/03	33,560
20% Foaling Increase 3/01/03 thru 6/30/03	6,712
Post-Foaling Population 7/01/03	40,272
Post-Foal Removals 7/01/03 thru 9/30/03	5,041
Remaining Population on 9/30/03	35,231



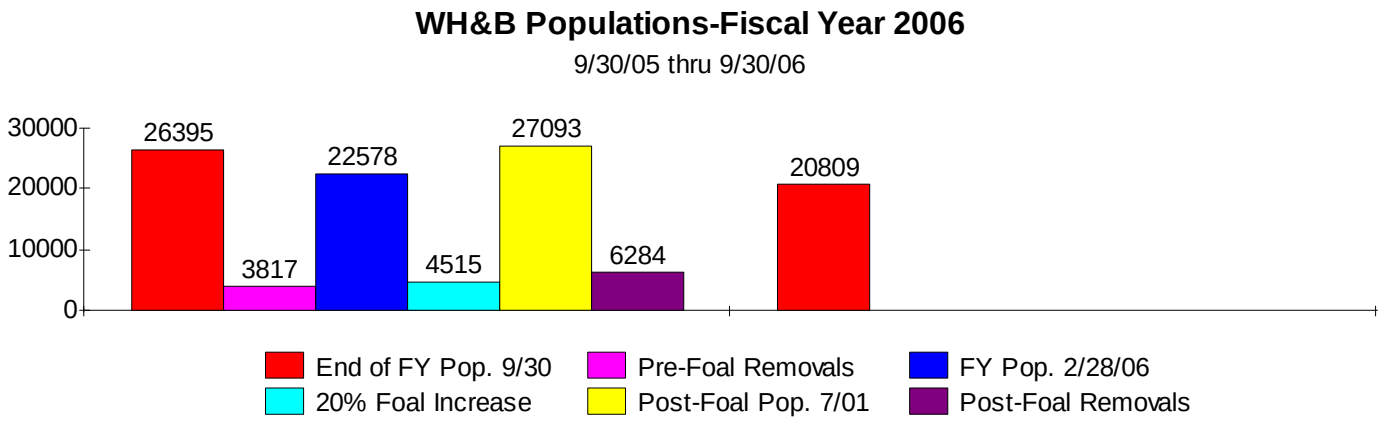
Fiscal Year 2004
10/01/03 thru 9/30/04
FY04 Total Removals 9,899

FY03 Population 9/30/03	35,231
Removals between 10/01/03 and 2/28/04	4,949
Population as of 2/28/04	30,282
20% Foaling Increase 3/01/04 thru 6/30/04	6,056
Post-Foaling Population 7/01/04	36,338
Post-Foal Removals 7/01/04 thru 9/30/04	4,950
Remaining Population on 9/30/04	31,388



Fiscal Year 2005
10/01/04 thru 9/30/05
FY05 Total Removals 10,246 (USFS removals deducted)

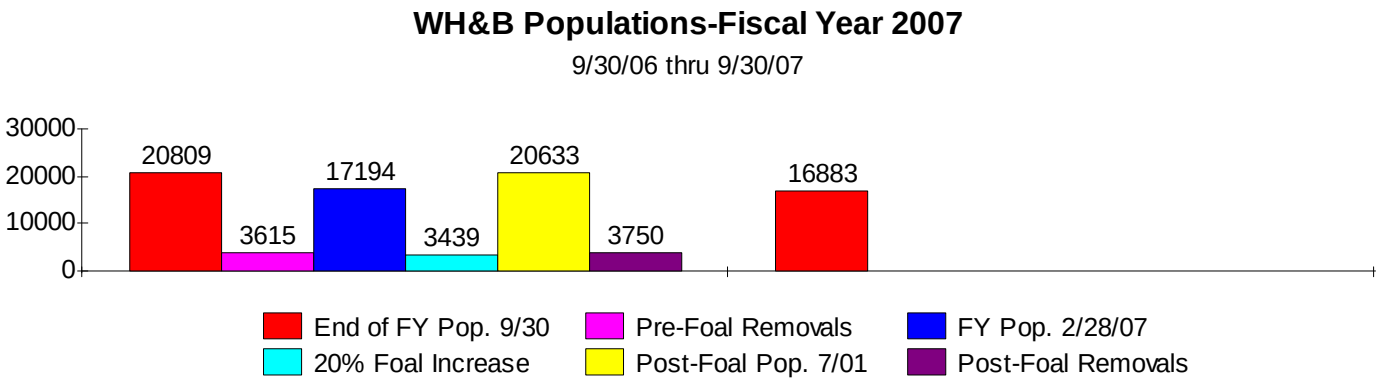
FY04 Population 9/30/04	31,388
Removals between 10/01/04 and 2/28/05	5,123
Population as of 2/28/05	26,265
20% Foaling Increase 3/01/05 thru 6/30/05	5,253
Post-Foaling Population 7/01/05	31,518
Post-Foal Removals 7/01/05 thru 9/30/05	5,123
Remaining Population on 9/30/05	26,395



Fiscal Year 2006
10/01/05 thru 9/30/06
FY06 Total Removals 10,101*

FY05 Population 9/30/05	26,395
Removals between 10/01/05 and 2/28/06	3,817
Population as of 2/28/06	22,578
20% Foaling Increase 3/01/06 thru 6/30/06	4,515
Post-Foaling Population 7/01/06	27,093
Post-Foal Removals 7/01/06 thru 9/30/06	6,284
Remaining Population on 9/30/06	20,809

*BLM has reported three different sets of removal numbers for Fiscal Year 2006. The first report was from their Final 2006 Gather Schedule numbers, which reported 10,323 removals. The second report was in their History of the Program Fiscal 2006 removals reporting 9,926. The third report was from their History of the Program Fiscal Year 2007 removals reporting 10,399. Due to these discrepancies, the middle number reported first in the Final 2006 Gather Schedule numbers was used for this analysis so that exact winter and summer removal numbers could be also applied as well as subtracting USFS removal numbers per the 2006 Final Gather Schedule.

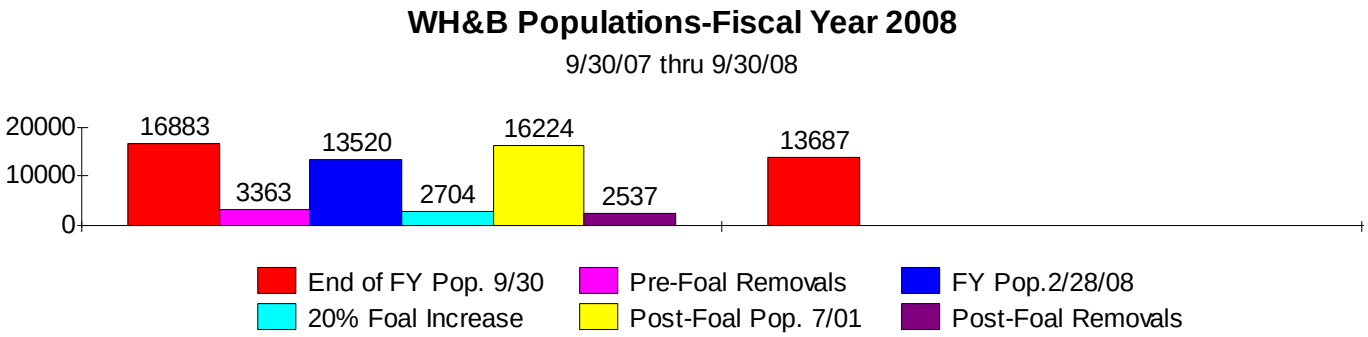


Fiscal Year 2007
10/01/06 thru 9/30/07
FY07 Total Removals 7,365*

FY06 Population 9/30/06	20,809
Removals between 10/01/06 and 2/28/07	3,615
Population as of 2/28/07	17,194
20% Foaling Increase 3/01/07 thru 6/30/07	3,439
Post-Foaling Population 7/01/07	20,633
Post-Foal Removals 7/01/07 thru 9/30/07	3,750
Remaining Population on 9/30/07	16,883

*BLM has reported two different removal numbers for Fiscal Year 2007. The first report was from their Final 2007 Gather Schedule numbers, which reported 7,365 removals. The second report was in their History of the Program Fiscal Year 2007 removals reporting 7,726. Due to these discrepancies, the original removal numbers reported in the 2007 Final Gather Schedule were used as to allow the highest level of remaining populations to be considered for this analysis. Also this afforded exact removal numbers between reported winter and summer gather cycles. No deduction was taken for USFS removals due to a myriad of discrepancies in Gather Schedules and reporting numbers.

Fiscal Year 2008 analysis is based in part on actual reported removal numbers provided by BLM to the National Wild Horse & Burro Advisory Board on February 25, 2008 and projected removals based on the summer portion of the 2008 Gather Schedule. The remaining population under the end of FY08 is projected populations only.



Fiscal Year 2008
10/01/07 thru 9/30/08
FY08 Total Removals Thru 2/28/08 3,263

FY06 Population 9/30/07	16,883
Removals between 10/01/07 and 2/28/08	3,363
Population as of 2/28/08	13,520
20% Foaling Increase 3/01/08 thru 6/30/08	2,704
Post-Foaling Population 7/01/08	16,224
Post-Foal Scheduled Removals 7/01/08 thru 9/30/08	2,537
Remaining Population on 9/30/08	13,687

IV. Emerging Theories

There is no logical explanation for these numbers if taken solely at face value but three theories have emerged as the most likely cause of the myriad of historical discrepancies and BLMs highly questionable remaining population estimates.

Census Methods

The first potential reason for such wide variations in reported populations is the census techniques BLM has utilized for years to count wild equid populations.

The need to refine census methods to produce accurate and reliable population counts of wild equids has long been a concern of both the Wild Horse & Burro Program as a whole as well as all those concerned with free-roaming wildlife populations in general.

Historical Methods

Currently, BLMs traditional census techniques use methods recommended by the National Academy of Sciences (NAS) Committee on Wild Free-Roaming Horses and Burros to estimate herd size, distribution, composition and rate of increase, as required in BLM Manual 4710 (11/23/88).

The NAS techniques have been verified as accurate through independent scientific review. Most recently, results were verified in a 1991 article published in The Journal of Wildlife Management 55(4):641-648. This study found that aerial counts consistently detected a large proportion of the wild horses (85-105 percent) but recommended that the high sightability probabilities reported should not be applied in areas with rugged terrain or dense woodlands. The exception noted to this technique was aerial counts for wild burro populations with a sightability factor noted as approximately 50%.

The Lincoln-Peterson mark-resight method is based on the 1982 Final Report BLM Contract No. AA851-CTO-52 completed by Siniff et al with the University of Minnesota, Department of Ecology and Behavioral Biology, which found that census flights using the direct count technique on areas with more difficult terrain and vegetation counted anywhere from 40-70 percent of the true population using a variety of different aircraft types. In this type of terrain, replicate counts using the Lincoln-Peterson mark-recapture method give the most accurate results. (1)

The short version is, BLM currently stands by the accuracy of their historical census techniques as verified by independent scientific review within a 15% (+/-) accuracy rate of most censused populations.

Emerging Census Methods

Currently, BLM and USGS have been working on a new census technique that has yielded some astonishing results, though data is still limited.

The most dramatic example of this occurred in Wyoming when in the fall of 2005, BLMs Wyoming Rock Springs Field Office issued a wild horse removal plan for the Adobe Town and Salt Wells Creek Herd Management Areas (HMA). BLM claimed that 730 wild horses would be removed in the environmental assessment but during the round ups, 1,197 horses were actually taken, 467 more than originally planned. (2)

In the 2005 proposal, BLM stated, "*At the present time, it can be projected with a high degree of confidence what the population will look like at gather time…"* and BLMs numbers should have been very accurate due to the fact that Adobe Town and Salt Wells Creek wild horses have been rounded up 8 times in the last 8 years.(3)

The remaining wild horse population after the 2005 removals based on BLMs standard analysis methods was projected to be 861 and it can only be assumed that taking an additional 467 more wild horses during the removal operations was necessary to achieve the target population goal. Yet five months later, BLM reported 1,825 wild horses still remained – almost 1,000 more than was originally projected.

Based on BLMs reported populations in February 2006, the Salt Wells Creek HMA, which was suppose to have a remaining population of 251 after the 2005 fall gathers, was suddenly reported as increasing to 1,133 in February 2006. This also caused a dramatic increase in the projected new spring foals, bringing the Salt Wells reported population up to 1,360 by the summer of 2006 and as a result, once again wild horses became scheduled for more removals.

As more accountability and accuracy has been demanded of BLM in the wild horse and burro program, it is possible that as wild equid populations have been reduced through concentrated removal efforts, the true populations occurring on the range began to reveal themselves. As a result, despite taking large numbers off that should have been quickly achieving the targeted population objectives known as Allowable Management Levels (AML), instead BLM found populations remaining static or even increasing because they never suspected those populations existed.

If the historical census methods BLM has been using for the last several decades merely failed to recognize the number of wild horses and burros actually occurring on the range in as gross of proportions as the new methods suggest, this would indicate that AMLs were established solely through arbitrary convenience and not linked to any sincere monitoring of range conditions, actual populations or utilization levels as required by law, their real reproduction or mortality rates and generally would suggest, despite almost 40 years of managing wild equid populations, BLM has had very little idea of what has really been occurring with wild horse and burro herds or their habitat. It would also indicate it was taking a great deal more wild horses and burros then BLM knew about that were the real populations triggering issues of rangeland deterioration and degradation.

However, in regards to the issue of using census techniques that attempt to account for unseen populations as this new census technique does, the National Academy of Science (NAS) conducted a research study assigned to the Public Rangelands Improvement Act to specifically address issues, concerns and management of wild horses and burros on public lands. As far back as 1982, NAS cautioned against using techniques that attempted to expand census figures through correction factors such as the new USGS census methods are now employing.

The National Academy of Science study stated:
"While many BLM employees have considerable confidence in the accuracy of the censuses, the Phase II research has shown that they may miss anywhere from 7 percent of the horses in very open areas to as many as 60 percent of the ones present in areas of dissected topography and tree cover,

even when carried out by experienced and careful observers *[How Many Horses/Burros are there in the West?, page 40]*. Hence, we have no way of knowing whether the West-wide estimates of horse numbers are closer to 93 percent accurate or 48 percent, and we caution against the use of any blanket correction factor that attempts to expand census figures to allow for unseen animals *[ibid, page 41]*. (4)

It would appear the NAS report provided sound advice regarding the temptation to use correction factors on censused populations as the new census methods U.S.G.S. has been working on have returned preliminary results indicating the applied correction factors were unrealistically projecting higher population levels than were actually present.

Additionally, results released in 1998 New Zealand study on wild horse populations stated all three aerial population cenuses resulted in inflated counts of actual populations and was attributed to wild horses running from the helicopters passes, which occasionally caused double counting. (5)

Recruitment Rates

Another possibility exists that wild horses and burros truly are prolific breeders with much higher reproduction rates than even BLM previously suspected.

However, the reality of this theory has very little scientific data or objective support based on various studies done on wild horse and burro populations over the years while much evidence has been found to the contrary and indicates even BLMs standard application of a 20% recruitment rate is high.

Regarding reproduction rates of wild horses and burros, the 1982 National Academy of Science (NAS) report on wild horse and burros referenced earlier stated that "From annual agency censuses, report from individual areas, and from the fractions of young populations, statements have been made that horses and burro populations typically increase at rates ranging from 16 to 22 percent per year. However, the Phase I Report explored several biases in census data, cited or calculated rates of increase based on a number of published values for reproduction and survival rates, as well as sex and age ratios, and concluded annual rates of increase of 10 percent or less [Executive Summary, page 1, paragraph 4].

To support this NAS's assertion, a study by M.L. Wolfe in 1980 done of feral horse populations indicated that computer simulations for equids indicated that if all females four years and older regularly produced foals, the survival rate would have to be 70% for foals and 85% for adults to enable the population to increase at a rate of <u>four percent per year</u>. This would allow the population to double in 18 years. If mortality is high, due either to hunting and/or drought, the population will decline and it may be difficult or impossible for it to recover. (6)

In an New Zealand study conducted on wild horse recruitment rates in the Kaimanawa population between 1994-1997, estimated rate of wild horse increase ranged from 5.9% to 8.5%. (7)

One of the purposes of BLM utilizing the 20% "high" reproduction rate was to help account for population variables, including their census methods generally believed to be within a 15% (+/-) accuracy rate.

However just in the last few years, BLM now asserts wild horse populations reproduce at a rate of a 20-25% or higher with no evidence to support their newest standard and have changed their removal policy by stating removals need to be conducted every three to four years instead of five to keep populations stable.

In 2005, BLMs Wyoming Wild Horse and Burro Specialist Alan Sheppard told local reporters that a "40% increase in a year was not unusual"(8) as BLM prepared for a new round of removals in the Adobe Town and Salt Wells Herd Management Areas. Yet, according to a report released by the U.S. Geological Survey in late 2007, despite almost forty years of management of these same herds, BLM had no records available of separate wild horse reproduction or mortality rates.(9)

Research on specific proposals have found BLM reporting a range of population increases varying from 12% to well over 60% in some areas. Wild burro reproduction rates is acknowledged as less than wild horses but little data has been found as to how much lower this rate might be.

In regards to the actual accuracy of BLMs projected recruitment rates, there is often little supporting data for many of BLMs assertions.

Sabotage

Historical Accounts

It is no secret that the Wild Horse & Burro Program has been fraught with questionable activity of the highest order for much of the history of the program.

There were the mass sanctuary and adoption schemes of the mid 80's that resulted in the initiation of new regulations to limit adoptions to merely four per year per individual with a set minimum adoption fee of $125.00 (the mandatory minimum adoption fee was later changed in 1996).

There was the Grand Jury investigation beginning in 1992 and finally terminated in 1996 with over 3,000 documents of hard won evidence alleging corruption and fraud that was never heard or subpoenas to inventory wild horse populations that was never granted.

The Associated Press reported that at least 32,000 wild horses were "missing" and as far back as 1998. Dale Tunnel, a special agent in charge of BLM's division of law enforcement in Santa Fe stated that 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 to favor livestock.(10) This allegation was collaborated by Nancy Whitaker, formerly with the Animal Protection Institute of California, who studied grazing allocations for ten years and also claimed figures were purposely inflated to favor cattleman.

A local resident of the little mountain community in Cold Creek, Nevada where wild horses roam freely among the cabins, has also reported this same kind of activity occurring for the last two years. See Appendix III for her statement.

Speculative Incentives

Creating a program based on moving temporary herds from one HMA to another to "prove" overpopulation could have a variety of hidden benefits, which might include:

- Higher reproduction rates than actually occur to justify removals,
- Reporting lower mortality rates than actually occur,
- Prevent reporting and accounting of true populations still remaining on the range,
- Allow for more frequent reductions in true populations due to the introduction of temporary herds,
- Reductions in actual wild horse and burro populations that put their long-term viability at serious risk with the long term objective of genetically "crashing" the majority of free-roaming herds,
- Unnecessarily increasing funding opportunities for the national wild horse and burro program as a whole,
- Creating an illusionary crisis in both populations and funding to justify the repeal of legal protections of wild horses and burros on public lands,
- Increase forage allocations on both a permanent and temporary basis at faster cycles for livestock production,
- Increase grazing authorizations to help facilitate higher loan values for base properties attached to grazing permits, which also increases public lands collateral value to banking systems on a national level,
- Provide a steady source of income to ranchers that operate long-term holding facilities with little concern as to verifying actual populations in these facilities while still receiving government guaranteed checks for horses that may or may not be there,
- Provide a steady source of income to helicopter contractors such as one that has reported earnings of $12 million dollars just since 2000 through their monopolized services with the potential of kick backs and loyalty to the current "program", and
- Provide opportunities for personnel to pocket extra cash through the sales of horses to slaughter as was alleged as a wide spread occurrence during the grand jury investigations of the 90's.

While the feasibility of conducting such extensive covert operations on a national scale seems incredulous, there is sufficient evidence of prior misconduct through a wide variety of credible authorities as well as a consistent history of inconsistent numbers that indicate this theory cannot be easily ruled out.

Additionally from a historical perspective, government programs in general seem less concerned for "common sense" decisions in relation to taxpayer-funded proposals, especially those that require little oversight or accountability. The temptation to exploit a never-ending flow of subsidies while simultaneously covertly "managing" a contentious program towards permanent elimination may have been deemed the perfect solution to the "problem" of non-revenue generating free-roaming wild horse and burro populations on public lands.

V. Questions and Data on Current Populations

The trend of inflated populations appears to be alive and well, not only on a national scale but also within individual herd management proposals too.

Inflated Populations

Nevada
In the now infamous Jackson Mountain HMA in Nevada, where 185 wild horses eventually died through a variety of complications, had removed 661 wild horses in 2003. However, a June census conducted prior to the scheduled round ups found a little over 700 more wild horses than was previously projected and BLM provided two explanations. The first explanation BLM issued was wild horses had migrated outside the HMA boundaries during the course of the 2003 round ups and then returned later, the second explanation was they had just flat out "missed them" the first time.

Just between 2007 and 2008 alone, Nevada HMAs such as Diamond Hills South reported populations jumping from 20 wild horses in 2007 to 161 in 2008, Black Rock Range East went from 74 to 215 while Black Rock Range West skyrocketed from 76 to 399, Bald Mountain jumped from 338 to 519, Seven Mile went from 40 to 100, Spruce-Pequop's population doubled from 72 to 144 and the Fox Lake Range, currently scheduled for emergency drought removals, went from 158 to 331.

Other Nevada HMAs BLM is now reporting unprecedented population explosions is Warm Springs Canyon, going from 139 in 2007 to 607 in 2008, Maverick Medicine HMA, going from 335 in 2005 to 875 in 2006 and Wilson Creek, where BLM conducted round ups in February 2007 and reported removing 646 wild horses with 130 remaining after the gathers – one year later, BLM is now reporting 386 wild horses have suddenly re-appeared, a 300% increase.

Clover Mountains, rounded up twice both early and late in 2006, reported 30 wild horses in 2007, but now have jumped to 78 in 2008 while the Granite Range increased from 208 in 2007 to 301 this year and the Tobin Range reported 146 wild horses in February 2007 but one year later, BLM claims wild horses now number 239.

The Antelope and Antelope Valley HMAs, where removals were conducted removals in 2002 as well as in 2005, reported 160 and 159 remained respectively after the 2005 removals. Treated with PZP, by February 2007, BLM wild horse populations were reported at 230 and 259 totaling 489.

After the 2007 foaling season, BLM estimated in December that wild horses now numbered 1,181 (11) and scheduled "emergency removals" of approximately 964 excess wild horses while planning to leave 411; 217 in Antelope and 194 in the Antelope Valley. Though BLM failed to achieve their removal target of 964, taking 847 instead, just one month after the round ups, BLM now reports 619 are still in the HMAs. In order for 619 wild horses to have remained, they would have had to total of 1,466 wild horses prior to the round ups, not 1,181, as 285 wild horses have now been "added" to the post-gather population.

The Dry Lake HMA was part of a "complex" gather done in late 2006. Based on the February 2006 reported population plus that years foals, wild horses should have only numbered 102. Yet BLMs 2007 Final Gather Schedule reported removing 136 while still maintaining 75 wild horses remained. One year later, BLM has now reported wild horses jumped from 75 to 263.

In the fall of 2006, BLM conducted emergency removals of the Rock Creek wild horses due to wildfire damage on the range. Their 2006 Final Gather Schedule reported 250 wild horses were removed with only 52 remaining. Five months later in February 2007, the National Program Office reported the Rock Creek wild horses still numbered 220, completely contrary to what their own final round up reports said just a few months earlier.

North Stillwater HMA has not been "officially" rounded up since February 2003. Yet in 2005, wild horse populations were reported as going down from 255 to 199 as BLM only cited they had "achieved" AML that year – this fact has disappeared from the 2008 records. In 2006, BLM reported the North Stillwater population was 229 but by the next year, populations were reported as escalating to 370 in Fiscal Year 2007 with "emergency round ups" scheduled for the summer of 2008.

California

California's High Rock HMA conducted round ups in the fall of 2006 and reported 124 remained, according to BLMs February 2007 National Program Statistics. One foaling season later, BLM now reports 356 wild horses in the HMA.

Other California HMAs reporting inflated populations include the Fox Hog HMA, which went from 144 in 2007 to 364 on 2008, the Buckhorn HMA reporting 71 wild horses in 2005 to 239 in 2006, and Twin Peaks HMA, the largest herd left in the state, is now reporting over a 40% increase over the last year.

Oregon

Oregon is reporting the Beaty Butte wild horses went from 151 in 2007 to 474 in 2008, a 213% increase, while the Paisley Desert HMA saw populations almost double in one year, going from 64 in 2005 to 118 in 2006.

Utah

In Utah, the Cedar Mountain HMA reported 355 wild horses in February 2007 but one year later, the population jumped to 531, as 49% reproduction rate. The Four-Mile HMA populations were reported at 30 in February 2006; two foaling seasons later, BLM now reports the populations tripled, now totaling 90 while Swasey wild horses have been reporting an annual increase of 40% for every year between 2004 and 2007.

Between 2005 and 2006, the Sulphur wild horses were reported as jumping from 300 to 490, a 63% increase. Round ups were then scheduled occurring in August of 2006 where the 2006 Final Gather Schedule reported 186 wild horses were removed with a remaining population of 314. Yet five months later, without any new foals to increase the populations, BLM reported in February 2007 the Sulphur wild horses now numbered 413 again.

Wyoming

For Wyoming, the Fifteenmile HMA, reported a population of 115 in 2007 but one year later, reports 240 wild horses, almost a 109% increase. The Muskrat Basin HMA went from 191 in 2006 to 305 in 2007, a 59% increase and the White Mountain HMA in Wyoming skyrocketed from 295 to 817 between 2006 and 2007 for no discernable reason, this time an increase of 276%.

In February 2006 in Wyoming's Divided Basin HMA, BLM reported 814 wild horses, which was an inflated population of approximately 108 more wild horses than a 20% foaling rate should have produced from the previous year. After another foaling season, which added 163 foals for a new total of 977, BLM conducted a round up in the fall of 2006, where they reported removing 594 wild horses. Yet again, five months later, wild horses were reported as still numbering 752. Even with using their inflated population rate of 814, only 383 should have remained, yet BLM still reported wild horse populations after the round ups at least twice as much as they should have been.

In 2007, BLM again went back to remove more wild horses from Divided Basin due to their failure to "achieve" their population goal, this time removing an 465 wild horses. In one year's time, BLM reported 1,059 wild horses were removed, more than the entire population started out to be.

The Wyoming Adobe Town and Salt Wells HMAs have had such a disturbing course of population reports, an entire section has been added as a case study titled "The Wild Horses of Wyoming, A Tale of Tallies" in Appendix IV.

Table 12. Inflated Wild Horse & Burro Populations Fiscal Year 2004-2008

*Indicates Round Up Conducted Prior To Reporting Date.

State	Herd Management Area	Populations Reported in: 2004	2005	2006	2007	2008
CA	High Rock HMA	263	308	402	124*	356
	Fox Hog HMA	475	556	120*	144	364
	Buckhorn HMA	61	71	239	287	344
	Twin Peaks HMA (WHs)	802	1,079	1,398	779*	1,122
NV	Bald Mountain	424	270*	302	338	519
	Black Rock Range East	160	56*	64	74	215
	Black Rock Range West	143	57*	66	76	399
	Buffalo Hills	412	306*	352	405	542
	Calico Mountains	485	200*	230	264	549
	Callaghan	271	454	569	669	847
	Clover Mountains	14	41	40*	30*	78
	Diamond Hills South	242	13*	15	20	161
	Dry Lake	60	72	85	75	263
	Fox Lake Range	466	119*	137	158	331
	Goshute	167	74*	90	108	194
	Granite Range	601	157*	181	208	301
	Maverick Medicine	286	335	875	190*	228
	New Pass/Ravenswood	200	400	486	571	268*
	North Stillwater	255	199*	229	370	386
	Roberts Mountain	183	270	317	372	123*
	Seven Mile	167	196	33*	40	100
	Spruce-Pequop	188	49*	60	72	144
	Tobin Range	100	111	128	146	239
	Warm Springs Canyon	337	105*	121	139	607
	Wilson Creek	564	521	625	130*	386
OR	Beatys Butte	591	105*	126	151	474
	Paisley Desert	64	118	142	170	204
UT	Cedar Mountain	420	190*	238	355	531
	Four Mile	36	51	30*	35	90
	Sulphur	250	300	490	413*	435
	Swasey	100	136	192	250	114*
WY	Dishpan Butte	127	50*	60	142	108*
	Divided Basin	490	588	814	752*	415*
	Fifteenmile	188	80*	96	115	240
	Muskrat Basin	195	159*	191	305	341
	Salt Wells Creek	405	480*	1,133	327*	379
	Stewart Creek	223	165*	277	145*	171
	White Mountain	200	246	295	681	205*

Deflated Populations

Conversely, there are also reports of BLM taking way too many wild horses or burros than they should during round ups, population reports that stay static for several years with no reported increases, declining populations despite no records indicating gathers have occurred and the additional complication of BLM having two kinds of round up reports, the "official" round up they report as "Last Gathered" and the "Achieving AML", where they report all removals conducted under "emergency conditions", which have both disappeared in subsequent reports as well leaving the impression that no round ups have been conducted in areas that really were.

On top of this, there is also the issue of wild horses and burros being reported as removed "outside" the HMAs, which leaves many populations open to wide variables, and can be used as a ruse for removing animals actually located inside their legal boundaries while failing to report it.

For example, during the 2007 Stone Cabin Complex round ups, BLM reported they only intended to remove some "stray" wild horses outside the Reveille HMA boundaries and their 2007 Final Gather Schedule supports this as no wild horses were cited as removed from Reveille – yet 125 were reported as being removed "outside" the gather areas.

In 2006, BLM reported the Reveille population was 116 wild horses, adding the spring foals would have brought it to 139, just peaking the maximum established AML. Yet the National Program Office reports removals were conducted in Reveille as populations were reported as declining to 49.

The Lake Mead Conservation Area in Nevada was once home to a large and thriving burro population. Gold Butte is the last HMA left were wild burros have not been zeroed out. In March of 2006, BLM proposed a round up due to wildfire damage that burned almost 50% of the HMA. (12) They took 132 wild burros according to the 2006 Gather Schedule but provided conflicting reports about how many burros were actually left. The Gather Schedule reported 98 still remained while the Las Vegas Field Office reported only 36.

In March 2007, just one year later, BLM went back to conduct another round up, this time their target was not only the Gold Butte burros but also to take all the remaining burros in the Muddy Mountain HMA, recently zeroed out through manipulations of data and omissions of crucial considerations. (13)

After raising questions about BLMs intent to take more burros out of Gold Butte when they claimed so few were left after the last round up, BLMs Nevada State Director Ron Wenker assured the public that all the burros to be taken around Gold Butte were living "outside" the HMA boundaries and none were scheduled for removals inside the HMA itself. In BLMs 2007 Final Gather Schedule, 149 burros were reported as taken from within the HMA.

Additionally, when BLM lists wild horses and burros for adoptions, if they were removed from outside HMA boundaries, it is BLMs policy to list them only as "outside", with no further explanation of where "outside" is. When the "outside" Gold Butte burros began showing up on BLMs Internet Adoption websites, all were listed as being taken from inside the HMA, despite BLMs assurances that this would not be the case.

In relation to BLM removing wild horses without any records, the Miller Flat HMA in Nevada presents an interesting study in wild horse "disappearances". All Fiscal Year herd statistics between 2004-2008 report the HMA has not been gathered since 2002. There is also no record of removals being conducted in BLMs 2006/2007 Final Gather Schedules.

The only record of wild horse removals occurring in the Miller Flat HMA in December 2006 was found in the Oak Wells Livestock Allotment Renewal for George I. Andrus, permittee ((EA# NV-040-07-22, pg.9) published by the Ely Field Office and the briefly mentioned wild horse gather provided no information of what the pre-gather or post-gather populations were nor did it provide any removal numbers as a result of the secret round up.

The National Program Office has continued to report the last time any wild horses were removed from the Miller Flat was in 2002 and there was no reported reductions in the Miller Flat wild horse populations in February 2007 after the above referenced gather. However, after this mysterious round up was reported to BLM in July 2007, herd statistics for 2008 report populations declining from 50 to 27 – but still no removals have been "officially" reported in the wild horse and burro program.

If BLM has been deliberately sabotaging the numbers for as many years as their own records suggest, then no one has any idea how many wild horses and burros are actually left.

However, analyzing nationally reported removals and reproduction cycles just since September 30th, 2000 with the supporting documentation of numerous herds being reported at inflated rates over the years, there is the significant possibility that national populations are likely to be much lower than is being reported, or even less than this analysis revealed and it is likely it may have been this way for a number of years.

Callaghan Complex-Current Case Study

The BLM recently sent out a public scoping proposal for the Callaghan Complex in April 2008, a collection of herd management areas in central Nevada proposed for round ups in late 2008 or early 2009. One of the areas included in the proposal, the Bald Mountain Herd Management Area (HMA), was scheduled for round ups in late 2007 but funding issues postponed the removals.

In the spring of 2007, BLM published an environmental assessment claiming the post-foaling population in the Bald Mountain HMA was approximately 379 wild horses with a historical reproduction rate of just 12%. Yet just one year later, a "new" census has determined populations are now estimated at 607 instead, a 60% increase according to the new reports. (14)

Every HMA surrounding the Bald Mountain HMA had mass removals conducted in 2007 and all achieved their targeted population objectives, with the exceptions of the Callaghan and Rocky Hills HMA, the other two areas being proposed for removals.

The BLM last conducted removals in the Callaghan HMA in 2002, where 868 wild horses were estimated prior to foaling season. Yet BLM applied a 35.8% reproduction rate for the herd while simultaneously claiming a historical reproduction rate of 17.8% and as a result of using the inflated reproduction rate instead, issued the projected population of 1,179 for the area. (15)

The Callaghan mares returned to the range after the round ups were treated with PZP to supposedly slow reproduction rates but population estimates by the National Program Office reported an extreme population jump of from 271 to 454 between 2004 and 2005. The BLM is now reporting an estimated post-foaling population in 2008 of 995 yet applying a 20% increase to the reported 2004 population prior to the 2005 inflated levels would only yielded 542 wild horses in the area, 50% less than is currently being reported.

No unusual population increases were found for the Rocky Hills HMA, the last area in the Callaghan Complex gather proposal.

The purpose of recounting the history of these three wild horse areas is to provide a clear, current example of potentially reported inflated populations. Despite reasonably timely removal schedules conducted over the last several years in the all the surrounding areas, which insured no significant wild populations were left that could have migrated into these HMAs, both the Bald Mountain and Callaghan HMAs are now reporting unusually high population numbers for no logical or discernable reasons.