

# Americas Mustangs & Burros

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



## PART III

Will They Survive?

## I. The Road To Here

Since the passage of the Wild Free-Roaming Horse and Burro Act in 1971, federal protections have consistently been eroded, habitat and critical resources have been withdrawn, whole historical herds have disappeared, with many of the remaining populations being slashed to the bone and managed in conjunction with fertility control administered to mares and now wild castrated stallions are about to join the ranks.

The road America's wild horses and burros have traveled since they were declared a "protected species" has been a long and turbulent one with many abuses, both proven and alleged, along the way.

The following is a brief accounting of some of their history in order to understand how they have arrived at where they stand today, poised on the brink of managed extinction by political influences, special interest pressures, finances and funding and in some instances, down right corruption and abuse of the very power that was given to protect them.

### **Selling America's Heritage Species**

In an interview conducted with BLMs Nevada Wild Horse & Burro Lead, Susie Stokke by George Knapp, Chief Investigative Reporter for KLAS-8 in Las Vegas, Nevada in the fall of 2007, Mr. Knapp asked hard questions about what BLM was doing to help the now captured wild horses and burros find good homes through adoptions.

In that interview, Ms. Stokke stated, "If you look at what Nevada is accomplishing compared to other states, we are doing everything we can."

So is this true? Not according to the Nevada Commission for the Preservation of Wild Horses April 7, 2005 Meeting Minutes. (44)

In discussing the Prison Wild Horse Training/Adoption Program, Ms. Cathy Barcomb, long-time administrator for the Commission reported that, "The last prison adoption had been extremely successful with all horses adopted averaging \$1,500. She reported that the new indoor arena had been dedicated for opening and that almost all of the Commissioners had been present for the ceremony. Ms. Barcomb noted that the Bureau of Land Management had recently met with prison officials and stated that they could no longer afford the prison program or adoptions in Nevada as their focus was primarily to place all funding towards removals of wild horses from public lands in an attempt to reach AML." (*emphasis added*)

She also added, "BLM was reducing the number of BLM supported adoptions to 3 per year instead of 4. She added that she felt BLM has not generally been very cost effective in their approaches to wild horse adoptions. She stated that there were usually 5-6 BLM personnel at each prison adoption, being paid overtime, and that it was unnecessary to have so many people there, which drives up the costs."

Commissioner Gleason stated that she felt BLM was spending more with no accountability.

Ms. Barcomb reported that, "In 2004, that the Expo and Department of Agriculture transported all the prison horses to the Expo adoption, not BLM, the volunteers and Dept. of Agriculture had also transported and set up all the panels for holding the horses, not the BLM. She stated in general, that BLM really didn't have to put any effort into the marketing, transport, promotions, care, feeding, or adoption of the prison trained horses that they just had to show up and collect the funds. But for 2005, the BLM has declined to allow any BLM horses, prison trained or not, to be adopted at the Expo."

Ms. Barcomb also stated, "The BLM Nevada would not be actively participating in the Western States Wild Horse and Burro Expo either. They would not have prison-trained horses on site, nor would they be doing an open house at the Palomino Valley Corrals."

Commissioner Evans stated that, "He was disheartened by the fact that BLM has approximately 28,000 horses in holding facilities, that its costing taxpayers a fortune, that the solution to the problem IS adoption, and cutting back on the adoption program shows a serious lack of judgment as to what is needed for a comprehensive working program."

Commissioner Brehm stated, "Adoptions hosted around the National Final Rodeo in Las Vegas were a good event and that almost all the horses were adopted in the previous years when BLM hosted adoptions there, but that it has been over 10 years since they did the NFR adoptions."

During the public comment period, Frank Cassas, Chairman of the National Wild Horse and Burro Foundation stated, "The 'National Marketing Plan for the Bureau of Land Management's Wild Horse and Burro Program' submitted by Fleishman-Hillard, Inc. on January 12, 2001....includes numerous constructive recommendations for invigorating and centralizing the BLM's Wild Horse and Burro Program's marketing and adoption activities."

Mr. Cassas expressed his frustration in that "nothing has been done since the report and recommendations have come out."

Commissioner Evans stated, "We've been talking about this with BLM for over 5 years.....now it's 5 years later and nothing. You can spend millions of dollars on study after study, and nothing ever happens."

Meanwhile, when George asks Ms. Stokke, "You would say the BLM has done its best to market to Nevadans in adopting wild horses?" Stokke replies, "I think that we are continuing to explore new opportunities and new avenues..."

The Commissioners statements in April 2005 can only leave the public wondering....

Why would BLM cut adoption events or refuse to supply wild horses and burros to events where "all they had to do was collect the money" when holding pens were bursting at the seams? In 2001, when BLM launched one of the most aggressive wild horse and burro removal campaigns they had ever undertaken, didn't they know what would happen?

Didn't BLM have a plan on how to deal with tens of thousands of wild horses and burros now crammed in government pens at taxpayer's expense?

### **The Plan**

"The plan developed by BLM was to escalate removals to balance public lands and achieve AML (Allowable Management Level). At the same time the Fleishman-Hillard study had introduced some very innovative changes to the adoption program."

"The whole concept was introduced to Congress to bring public lands down to AML. BLM asked Congress for an additional 36 million dollars over 4 years to implement their new plan because they knew they would be taking approximately 12 thousand wild horses off of public lands per year, BLM knew they could average 7,000 horses per year in the adoption program, they knew there would be approximately 5,000 horses in excess each year."

"They knew it and planned for it. They knew that by the fourth and fifth years that they would have 20,000 horses in holding, that's what the extra funds were for. The concept was that after BLM got to AML that only 3,500 to 4,000 horses per year would be removed from public lands and with a demand of over 7,000, the BLM would then start removing them from the sanctuaries and place them in the adoption program."

"The whole plan was to balance itself and greatly reduced the costs because you would then be lowering the costs of holding horses in sanctuaries, you would only be removing 1/3 the number of horses on public lands and reducing that cost drastically, and you wouldn't be holding or processing as many horses because they would be adopted. The whole plan was a good one, Congress endorsed it, and now, we are there, we are within one year, they got all the horses in the sanctuaries, as planned, and then voted into slaughter all of them."

"I feel it was somewhat of a setup, we were betrayed. We all bought into the plan and supported it, only to be turned on once the horses came off the lands."

Cathy Barcomb, Administrator  
Nevada Commission for the Preservation of Wild Horses  
April 7, 2005

### **Year of the Horse**

The year 1998 was a big one for wild horses and burros as two major events happened laying the groundwork for the most stunning change in wild horse and burro policy since the passage of the Wild Free-Roaming Horse and Burro Act itself. Of course, this change would be the Unconditional Sale of our herds commonly known as the Burns Amendment and now carried out by BLM under the term "Sale Authority".

However, as is commonly believed, there was nothing "stealth" about it – selling our wild heritage was well planned and coordinated effort long before it was "slipped in" the day before the Congressional Thanksgiving break.

In August of 1998, Nevada Ecological Consulting, Inc. presented the Draft Nevada Wild Horse Management Plan for Federal Lands to the Nevada Department of Conservation and Natural Resources/Commission for the Preservation of Wild Horses in response to Bill 211, enacted by the Nevada Legislature in 1997 requiring the Commission to develop a plan for managing wild horses in Nevada.

There were sixty-five participants that provided input for this plan as well as nine public meetings held throughout the state.

The Plan discussed a large array of issues on wild horse and burro management but almost none of the solutions presented to maintain wild horses and burros as integral components of public lands have gone any further than the drawing board. The emphasis seemed to be on what to do with the wild horses and burros once they had been removed from the range, not providing the critical habitat requirements necessary to keep them from being removed. Here are exact quotes from this Draft Management Plan:

#### Nevada Draft Wild Horse Management Plan for Federal Lands

##### Section 5.82 - Strategy

By the year 2005, reach AML on all delineated HMAs by removal of unadoptable wild horses (as a last resort), either by euthanasia methods preferably on home range, or by sales authority granted to BLM with all sale receipts earmarked to defray program costs.

##### Section 5.83 - Actions

-BLM and Congress should abide by the provisions of the ACT allowing euthanasia as a humane method of removal of excess numbers of unadoptable wild horses, and that the euthanasia prohibition in the annual Congressional Appropriations Act for funding of the wild horse program be rescinded.

-Congress should consider amending the ACT to allow sales authority to BLM for placement of unadoptable wild horses where a reasonable number of adoption attempts have failed to place the animals. All sale receipts from such placement to be earmarked to the state of origin to defray costs of program.

-BLM should consider initiating studies on time delay "Sunset"\* euthanasia drugs which would allow humane death of known unadoptable wild horses on home range to spare the animals the stress of shipping and corral storage and to eliminate these program handling costs. (\*A Sunset Drug is a drug that would be administered allowing the wild horses and burros to be killed slowly.)

##### Appendix B

1) Amendment to the Wild Horse & Burro Act of 1971 is needed to include a sales authority clause to remove excessive numbers of unadoptable animals with sale proceeds earmarked to defray program costs.

##### Appendix C, Synopsis of Public Forum

-3 strikes and you're out by either sale or euthanasia.

Here is the law that was enacted six years later, initially reported as having been co-sponsored by Nevada Senator Harry Reid, which Congress has still failed to repeal.

Fiscal Year 2005 Omnibus Appropriations Act Public Law 108-447, Division E, Section 142

**SEC. 142. SALE OF WILD FREE-ROAMING HORSES AND BURROS.**

*(a) IN GENERAL Section 3 of Public Law 92-195 (16 U.S.C. 1333) is amended—*

*(1) in subsection (d)(5), by striking 'this section' and all that follows through the period at the end and inserting 'this section.'; and*

*(2) by adding at the end the following:*

*‘(e) SALE OF EXCESS ANIMALS-*

*‘(1) IN GENERAL- Any excess animal or the remains of an excess animal shall be sold if--*

*‘(A) the excess animal is more than 10 years of age; or*

*‘(B) the excess animal has been offered unsuccessfully for adoption at least 3 times.*

*‘(2) METHOD OF SALE- An excess animal that meets either of the criteria in paragraph (1) shall be made available for sale without limitation, including through auction to the highest bidder, at local sale yards or other convenient livestock selling facilities, until such time as--*

*‘(A) all excess animals offered for sale are sold; or*

*‘(B) the appropriate management level, as determined by the Secretary, is attained in all areas occupied by wild free-roaming horses and burros.*

*‘(3) DISPOSITION OF FUNDS- Funds generated from the sale of excess animals under this subsection shall be—*

*‘(A) credited as an offsetting collection to the Management of Lands and Resources appropriation for the Bureau of Land Management; and*

*‘(B) used for the costs relating to the adoption of wild free-roaming horses and burros, including the costs of marketing such adoption.*

*‘(4) EFFECT OF SALE- Any excess animal sold under this provision shall no longer be considered to be a wild free-roaming horse or burro for purposes of this Act.’.*

It should also be noted that a few years ago, BLM also began warehousing wild horses as young as five years of age in long-term holding facilities, declaring they were “unadoptable” as well. These young horses now face a very uncertain destiny due to BLMs discreet application of what they determined were the qualifications for their placement in long-term containment centers.

## 1998 Congressional Subcommittee Hearing of National Parks and Public Lands

The second big event that happened in 1998 was a Congressional Subcommittee Hearing of National Parks and Public Lands held in Reno, Nevada on July 13th titled, “Field Hearing on Range Issues and Problems with the Wild Horse and Burro Act and Its Implementation.” (45)

It was here that a handful of men began laying the groundwork to amend the Wild Free-Roaming Horse & Burro Act to include a “Sales Authority” clause to allow them to be slaughtered as well as exploring all possibilities for disposing of America's “excess” wild horses and burros.

The need to grant BLM the authority to slaughter America’s wild horses and burros was openly discussed by many with testimony citing them as merely feral “like alley cats” and that BLM needs to be able to manage them as livestock, a position supported by then BLM Nevada Director, Pat Shea.

Nevada rancher, Demar Dahl, offered this practical insight by stating, “We eat them. The horse is a resource....I love good horses, but there are a lot of horses that are just to be eaten and that is their best use.....And I can tell you right now, there are a lot of wild horses, BLM—horses with a BLM freeze iron under the brand, that go through the sales to the killer plants today. And any horse sales that you want to go to where they put killer horses through, you will find a number of wild horses....So it is happening already, we just need to recognize it.”

John Balliette, Contractual Natural Resource Manager from Eureka County, Nevada stated, “Some real double standards exist when it comes to sale authority. Each year our country sells thousands of privately owned horses for slaughter. But the mere mention of sale authority of "wild" horses with the possibility of slaughter is offensive to some. Horses are the only large ungulate on Federal lands that are not harvested for consumptive purposes. If harvesting one large ungulate is acceptable, why is harvesting horses unacceptable? Horses must be viewed as are other large ungulates on Federal lands, a renewable resource that can be effectively managed by harvesting excess numbers.”

Senator Dean Rhoads, Chairman of the Senate Natural Resources Committee for the Nevada Legislature and a rancher himself led the charge to implement a Sales Authority with such statements as, “I usually do not go to the sales yard so I have no idea who buys them, but I assume that some of them are bought by people that take them home and break them. Others are probably bought that ends up in the slaughterhouse. But that is just the thing that we have been doing for centuries.”

Nevada Lincoln County Commissioner Rey Flake reminded everyone that “Ranching on public lands is also a legacy of the west” and presented this vision to Congressional representatives for his model of what the Wild Horse & Burro Program should look like, “We need to consider the idea of having one or two herds of horses in each state.”

Senator Rhoads supported Commissioner Flakes statement by affirming the idea for a few public viewing centers citing “...we would probably put up some vistas and interpretive centers and so forth” then also added, “Then you could remove all the other horses from the west on much of **our grazing lands.**”

The following individuals all testified and supported a need to introduce legislation to allow BLM to sell “excess and unadoptable” wild horses and burros or explore all means to dispose of or destroy them:

Utah Congressional Representative James Hansen, Nevada Congressional Representative Jim Gibbons (now Nevada Governor), NV Legislative Senator Dean Rhoads, NV Assemblyman John Carpenter, NV Elko County Commissioner Anthony Lesperance, Ph.D, NV Lincoln County Commissioner Rey Flake, NV Eureka County Natural Resources Manager John Balliette, National Wild Horse Association Field Director David C.J. Tattam, Arizona Game & Fish Department Director Duane L. Shroufe, and NV Rancher Demar Dahl.

Current Nevada Senator John Ensign, who introduced S. 1915, a bill to amend the Horse Protection Act to prohibit shipping, transporting, moving, delivering, receiving, possessing, purchasing, selling, or donation of horses and other equines to be slaughtered for human consumption, and for other purposes, was also present as a Congressional Representative at this 1998 Field Hearing.

Representative Ensign made no comment throughout the proceedings regarding the selling of America’s wild horses and burros for slaughter. His statements were limited to, “How much of the policy is actually being directed based on pure emotionalism? How much of the policy is being directed on what is truly best for the environment, best for the animals in the long-run for the overall part of the population, and truly how are we getting to where we are going....?”

As politicians and cattlemen lined up to testify against the wild horses with arguments that ranged from how their “excessive numbers” destroy the range and riparian areas, stripping the forage for their livestock, and threaten true wildlife species such as bighorn sheep, they never failed to grind the ever popular axe of wild horse and burro management costing the taxpayer a fortune by being nothing more than a “Federal welfare case” (Representative Jim Gibbons). Utah Representative James Hansen stated, “If any public land program could be called a subsidy, this would be it.”

While these cattlemen were arguing against the costs of the Wild Horse & Burro program and how public land is really their land, USDA Records shows in 1998, almost \$2.7 million dollars was handed out in federal subsidies in Nevada and exceeded \$62 million dollars between 1995 and 2005 for Nevada ranchers and farmers alone.<sup>(46)</sup> This does not take into account that a rancher is currently paying \$1.35 per month per cow to graze them on public lands -1/10th the cost of private grazing fees or that cows are now 23% larger than their predecessors twenty years ago.

USDA federal subsidies records also shows NV Senator Dean Rhoads of Rhoads Trust Dean & Sharon have personally received \$500,875 dollars between 1995 and 2005. <sup>(47)</sup>

This Field Hearing was conducted one month before the Nevada Draft Management Plan for Wild Horses was introduced. During this hearing, Cathy Barcomb, Administrator for the Nevada Commission for the Preservation of Wild Horses reported to these Congressional Committee members that the Draft Management Plan for Wild Horses for Nevada was due out in August adding, “...a lot of people that are in this room helped us write the plan and I think it is a good compilation from Nevada.”

## **The American Scene**

So how long have a handful of individuals been trying to eliminate wild horses and burros from the American scene? As far back as their American history goes.....

In fact, there is so much available evidence clearly showing inappropriate and often illegal activities levied against wild horses and burros, only the illiterate could be convinced otherwise.

In his book, *Wild Horses: Living Symbols of Freedom* (8) wildlife ecologist and author, Craig C. Downer states how it began, "It was the White life style which caused the mustang's demise, along with that of the buffalo....The horse allowed the Indian to withstand the White settlers and, so, the horse came to be regarded as part of the whole Indian "problem". A prejudice against wild horses has remained as a part of the tradition to this very day among ranchers and farmers as well as others in the West."

Mr. Downer asserts the 18th century saw the pinnacle of wild horse populations, estimated then at nearly 10 million strong but by the turn of the 19th century, their numbers had been reduced to 2 million and in the late 1950s, when Wild Horse Annie began creating public awareness for the plight of the wild horse, it was estimated their numbers had been gutted to a paltry 25,000 throughout the West.

When public love and outcry sparked Congress to pass the Wild Free-Roaming Horse and Burro Act in 1971, those still prejudice against the wild ones have been seeking to overturn their federally protected status ever since.

In 1973, legal proceedings were initiated by a New Mexico cattleman who unsuccessfully tried to overturn their federal protection in *Kleppe vs New Mexico* (1976). (48)

Betsy A. Cody, Specialist in Natural Resources produced a report for the Congressional Research Service on *Wild Horse and Burro Management* (49) which stated, "In 1984, BLM started to allow individuals to adopt large numbers of animals for free. Approximately 20,000 horses were adopted while this fee-waiver program was in effect and several thousand of these animals reportedly ended up in glue or pet-food factories. The program was stopped in 1988 due to public outcry."

Karen Sussman, President of the International Society for the Preservation of Mustangs and Burros (ISPMB) submitted a report to the Subcommittee on National Parks and Public Lands June 5, 1998, that stated, "Regulation changes proposed in 1984... allowed BLM to gather an unprecedented number of wild horses during the two year period that the rule changes were pending." (50)

"Another 1984 regulation was implemented known as fee-waivers/mass adoptions which allowed 100 or plus horses to be given to adopters. Ranchers adopted them and turned around and sold many to slaughter after title passed."

"During these years, with BLMs approval, several attempts were made to allow BLM to sell "unadoptable" horses for slaughter by initiating language, which never got out of committee in Congress. The Range Omnibus bill, which included the slaughter provision made it to the floor of Congress but was defeated."

The Government Accounting Office (GAO) released their audit and report in August 1990 of the BLMs Wild Horse and Burro Program titled, Rangeland Management, Improvements Needed in the Federal Wild Horse Program, which included scathing indictments of wild horses being regularly sent to slaughter and unfair treatment by BLM. (51)

A 1997 report released by the Public Employees for Environmental Responsibility (PEER), Horse Slaughter -Anatomy of a Cover-Up, explicitly details BLM abuses, wild horses and burros going to slaughter and a complete lack of accountability in the wild horse and burro program that many believe still continues today. (52)

The PEER Horse Slaughter Report states: “BLM has tolerated and in some instances facilitated the routine and illegal trafficking of wild horses to slaughter. The agency has obstructed efforts by its own law enforcement officers to expose commercial theft of wild horses, fraudulent adoption schemes and fictitious "sanctuary" herds not only to avoid embarrassment but also to maintain the flow of horses off the range.”

“The BLM began a crackdown on wild horse-to-slaughter operations in 1993 under former Director Jim Baca. BLM investigators began compiling evidence documenting:”

- Theft of wild horses during BLM sponsored "gathers" or captures;
- "Black booking" or phony double branding of horses so that duplicate branded horses could disappear without a paper trail;
- Manipulation of wild horse adoptions where one person holds the proxies for a group of supposedly separate adopters and the horses all end up at slaughter;
- Use of satellite ranches to hold horses for days or weeks as stopping points on the way to slaughter;
- Fraudulent use of wild horse sanctuaries--ranches subsidized by the federal government to care for unadoptable wild horses deemed excess and removed from the range--as fronts for commercial exploitation.

“Lawyers from the Department of Justice also urged that the case be dropped because the tolerance within BLM for the horse to slaughter trade was so widespread that it would be unfair to single out any one person for prosecution.”

Associated Press reporter, Martha Mendoza also did a series of articles on the travesty occurring, such as “Wild Horse Criminal Case Shut Down” (53), which involved additional investigative reporting that found a long-standing history of cover ups, abuses and wild horses and burros being sold for slaughter.

Bill Sharp, who worked for the BLM before retiring in 1994 was quoted as saying, "If I really was worried about intent then I probably wouldn't have adopted out any horses, because I believe 90 percent of these horses go to slaughter."

While evidence piled up that indeed, America's wild horses and burros were routinely being sent to slaughter with many BLM employees actively participating, looking the other way or being too afraid to speak out, the Grand Jury Investigation was successfully slammed shut in 1996 without any of the hard won evidence ever being heard.

Congress responded by turning a blind eye – to this day, they have failed to demand any investigation or accountability of these allegations and have failed to require BLM to submit biannual reports on the Wild Horse and Burro Program, as required by law, since 1997.

In July 1998 Congressional Subcommittee Hearing in Reno, Nevada, the Honorable Delegate from the Territory of American Samoa, Eni Faleomavaega, continued to press for answers; "...there are allegations that thousands of horses are being slaughtered and there are further allegations that BLM could not even account for some 32,000 adopted animals, and that even BLM employees may have been participants and may even have profited in the slaughter of thousands of wild horses."

His questions, and ours, have never significantly been addressed.

The prosecuting attorney for the derailed Grand Jury investigation, Alia Ludlum, stated, "I believe that my investigation was obstructed all along by persons within the BLM....I think there is a terrible problem with the program and with government agents placing themselves above the law."

And so with alleged improprieties, abuses, and illegal activities against wild horses and burros being sanctioned and covered up at the highest levels, Larry Johnson, Director of Nevada Bighorns Unlimited and currently serving on the 2008 Wild Horse and Burro Advisory Board, stepped up to the plate.

In April 2001, Mr. Johnson submitted statements in concert with BLM under a Wild Horse Attachment <sup>(54)</sup> to a Senate Subcommittee on Energy and Natural Resources to urge their support for "The Restoration of Threatened Watersheds", citing wild horses and burros, not livestock, were one of the major threats to both watershed health and wildlife and as such, funding was needed to drastically reduce their populations across the West.

In October 2001, armed with Congressional approval and funding, BLM proceeded to launch the second most aggressive removal campaign of the programs history, rounding up over 70,000 wild horses and burros over the last seven years.

With the Sales Authority waiting in the wings, BLM officials successfully escaping federal indictments, prosecution or any accountability at all, years of frustrated efforts to strip federal protection of America's wild horses and burros was finally rewarded – and the enemies of America's wild horses and burros just sat back to wait as BLM began removing and warehousing thousands of America's mustangs and burros.

## **New Mexico & Non-Slaughter Geldings**

It was New Mexico law enforcement agents that began investigating the selling of wild horses to slaughter in 1992. This investigation centered around the direct participation of BLM employees and contractors selling wild horses for slaughter with both the knowledge and approval of BLM managers. Their scheme involved the use of satellite ranches and horse sanctuaries to hide the horses for profit operation. <sup>(55)</sup>

The Grand Jury investigation into illegal wild horse slaughter began with two BLM employees: Mr. Galloway and Mr. Sharp, both working under the direction of Steve Henke, currently still employed by BLM as a District Manager in Farmington, New Mexico.

In 1995, the Grand Jury issued subpoenas intending to inventory more than 1,200 horses at a BLM sanctuary in Bartlesville, OK but a Department of the Interior lawyer in New Mexico, Grant Vaughn, wrote a letter telling the prosecutor that his agency could not comply with the subpoenas and efforts to access any information about these facilities was successfully thwarted. <sup>(56)</sup>

Over ten years later, a different investigative report was released in November 2007 by Valerie James Patton, which includes some serious questions surrounding BLM sanctuaries in Bartlesville, OK and the more than 8,000 geldings these sanctuaries now hold.

Ms. Patton's Investigative Report <sup>(57)</sup> centers around an anomaly of exclusive gelding exports from the Santa Teresa Livestock Port of Entry between New Mexico to Mexico, where USDA export records indicate record breaking levels of geldings have been sent to Mexico under a "non-slaughter status".

Her report on the possible illegal shipment of these horses compares the Texas export numbers of non-slaughter geldings with the Santa Teresa Port's export numbers, notes that Santa Teresa does not send any other kind of horse through their port under a non-slaughter status and asks hard questions about what Mexico is doing with these geldings that are now numbering into the thousands, as they are obviously not for breeding purposes.

Furthermore, her report states that the only currently known source for such a continuous supply of geldings is BLM sanctuaries. The report gives significant treatment to statistics, numbers, locations, interviews, newspaper articles, government connections between U.S. and Mexican officials, and as the evidence mounts, a powerful case is presented which demands an official investigation into the both the source and the destination of these non-slaughter geldings.

Except it looks like that is going to be very difficult.....

Her report also includes the results of a recent on-site investigation by Animals' Angels investigators who were denied access to Santa Teresa's facilities and what little information New Mexico officials offered turned out to be false - these officials included USDA employees. Yes, this is the same USDA that flipped Congress the finger when they voted to withdraw funding for horsemeat inspections in efforts to shut down the American horse slaughter trade in 2006. <sup>(58)</sup>

In another Associated Press news article by Martha Mendoza published in 1997, "Trail's End for Horses Slaughter", over 200 BLM employees were cited as adopting wild horses and burros with most unaccounted for and some employees acknowledging they were sent to slaughter while Pascal Derde, the proprietor of Cavel West Slaughterhouse in Redmond, OR, reportedly "displayed a sheaf of BLM certificates for horses he recently butchered". (59)

Gabriel Paone, a Department of the Interior ethics official was quoted as saying there was nothing wrong with BLM employees adopting wild horses and then selling them for profit. "They're not doing this as public officials." Paone said. "They're doing this as private citizens."

In an article by American Wild Horse Preservation Campaign, "The Story Behind The Burns Amendment", a plan is outlined showing which way American wild horses were headed. "A few years ago, a Montana rancher proposed to send 10,000 wild horses to Mexico, the second largest horse meat supplier in the world, for his private enterprise craftily dubbed the "Sonora Wild Horse Repatriation Project." (60)

Apparently, the boldness of this proposal created so much opposition it was ultimately defeated - perhaps an even craftier enterprise was needed to move our horses into Mexico.

The political consequences of openly killing wild horses and burros was foreseen during the July 1998 Field Hearing held in Reno, NV as John Balliette, Contractual Natural Resource Manager, Eureka County, NV stated, "I also urge you to be cautious with euthanasia, especially for large reductions. Personally, I would view putting thousands of horses down as a terrible waste of a resource. I also believe the first time several hundred horses are euthanized in one spot, a political firestorm will follow".

Needless to say, Mr. Balliette was correct but it didn't take several hundred to do it.

In November 2004, the Burns Amendment was "slipped in" and became a reality for our wild horses and burros in 2005. Forty-one wild horses were slaughtered in an Illinois slaughter plant, some of the first sold under this new For Sale Authority and public outrage caused BLM to temporarily suspend sales between April 25 thru May 19, 2005. (61)

BLM also rewrote and strengthened the adoption contracts before resuming sales but considering past historical violations, even by the agency itself, as well as no true legal consequences to those who violate these contracts due to Congress continuing to give BLM the authority to sell them "unconditionally", there is little hope that violators will actually be prosecuted if our horses and burros end up hanging from a hook.

On top of that, in March 2005 then BLM Director Kathleen Clark testified before Congress regarding questions about the Burns Amendment and stated, "Once the bill of sale has been effectuated, then we have no control over what the buyer does." (62)

According to Ms. Patton's investigative report, the shipment of unusually high numbers of non-slaughter geldings sent through Santa Teresa, New Mexico to Mexico began on August 16th, 2005, just three months after BLM resumed selling our wild heritage to sealed bidders.

Advocate and watch dog groups have been requesting details about the For Sale Program but meaningful answers have not been forthcoming and the BLM only publicly provides a running total of the wild horses and burros "sold".

So here we sit.....

Unprecedented numbers of wild horses and burros have been swept off public lands authorized by completely absurd assessments, BLM cut adoption events over the last few years during a time when they needed this outlet most, the cost of capturing and holding America's wild horses and burros in these mysterious sanctuaries continues to skyrocket and then New Mexico found itself in the center of the news - again!

Some speculate these geldings were being shipped to Mexico as unwilling participants in a popular form of Mexican entertainment called Horse Tripping. Even so, most horses used for these events end up in Mexican slaughterhouses once the ropes have cut their flesh too deeply or their legs finally brutally break.

In late April 2008, Santa Teresa's livestock exports reports began to change and now reports shipping all classes of horses, geldings, stallions and mares through their port of entry. Does this mean the flow of exclusive geldings have stopped? Has the non-slaughter trade found room to expand to other classes of horses? (See Appendix VIII)

If gelded wild horses were indeed the ones being shipped through Santa Teresa, as evidence was suggesting, perhaps a decision was made that this outlet would no longer be needed.

During the February 2008 National Wild Horse & Burro Advisory Board, wild horse advocates reported BLM was seriously discussing issuing Congress an ultimatum – either give BLM more money to manage the program properly or allow them to begin to issue Instant Titles on all wild horses and burros - no compliance checks, no holding facilities, no limitations.

During the June 2008 Advisory Board meeting, BLM went a step further, now recommending they be allowed to take their last leash off, wanting the authority to "euthanize" all wild horses and burros directly at the round ups sites - BLMs current method of euthanasia is through the use of firearms and gunshots to the head.

The week before the National Wild Horse and Burro's Advisory Board stunning announcement of wanting full scale euthanasia authority, Santa Teresa only reported 25 wild horses were sent into Mexico under a non-slaughter status, none of them geldings, one of the only times this has happened in the almost three years since the shipment of non-slaughter geldings began.

## **Betraying the Public Trust**

Can the American public trust BLM with their tarnished track record filled with substantial amounts of allegations and verified abuses?

BLM already has limited authority to euthanize wild horses and burros under specific conditions such as unacceptable and unhealthy body conditions, being too old or physical deformities and/or injuries causing them suffering, pain and possibly death anyway.

In November 2007, BLM conducted round ups in the Augusta Mountain HMA, where thirteen wild horses were reported as having been euthanized; eleven of them reported as being 20-30 years old or older. Despite vast amounts of public lands at BLMs disposal, BLM reported the Augusta Mountain wild horses were buried on private property instead of public lands, making it necessary to obtain a search warrant to verify their deaths if the property owner was found to be uncooperative.(See Appendix IX)

In February 2007, the current Director of the Wild Horse and Burro Program, Don Glenn submitted a rebuttal to an article printed in the Quarter Horse news, titled, “185 Wild Horses Dead” by Linda Hussa, which examined the reasons and causes why 185 wild horses rounded up from the Jackson Mountain HMA in late August of 2007 eventually died at BLMs Palomino Valley holding facilities. (63)

The article reported BLM knew the Jackson Mountain wild horses were suffering for at least two months before the round ups, that the BLM agent who authorized the helicopters driving them to the pens had personally witnessed them standing in dried up water troughs in June, and that BLM had determined hauling water to the wild horses then, or prior to the round ups, was “unnecessary”.

In BLMs rebuttal to “185 Wild Horses Dead”, Mr. Glenn publicly stated wild horses didn’t live much past 12 years old in the wild and recounted how their demise through the harsh conditions of the free-roaming natural lifestyle exacted a heavy toll of suffering, pain and death once this age threshold was crossed. But that’s not what the Augusta Mountain euthanasia report revealed. What happened to BLMs long-standing claim that wild horses and burros are a “long-lived species with few natural predators”?

Mr. Glenn also recounted the difficulties of BLM obtaining accurate population counts of free-roaming wild horse populations, that it wasn’t an exact science and BLM was working on new techniques to help them count America’s wild horses and burro better.

Yet, the studies being performed over the last three years in Wyoming’s Adobe Town and Salt Wells Creek HMAs, a partnership project with U.S. Geological Survey/Biological Research Division (USGS/BRD), revealed BLMs publicly reported wild horse census counts didn’t match USGS’s counts one time. Furthermore, in 2003 BLM reported a total of 1,947 wild horses were removed from the Adobe Town and Salt Wells areas during three separate round ups while USGS reported 2,350 wild horses were removed in just one August round up alone. (64)

In all these instances, as well as dozens more, BLM has failed to accurately report the truth to the public about their activities and the program itself.

### Selling Wild Horses and Burros

While BLM maintains sales of wild horses and burros under their For Sale Authority have been rather limited, with current information limited to “more than 2,700 wild horses and burros” have been sold, in past meetings of the National Wild Horse and Burro Advisory Board Minutes, contradictory information was also found about just what and who BLM was actually selling wild horses too.

In the Advisory Boards April 10, 2006 Meeting Minutes, BLM stated that, “In February 2006, letters were sent to over 15,000 public lands ranchers asking for their assistance by purchasing older horses. The BLM received good media coverage. The BLM has had about 30 contacts from ranchers interested in the program. A few sales have been made to ranchers and several more to individuals who read about the letters.”

Yet just three months later, in the Advisory Boards July 16, 2006 Meeting Minutes, BLM reported, “Public land ranchers have not purchased any horses.”

Unconfirmed reports from those who monitor horse slaughter have reported freeze branded wild horses showing up in horse slaughter feed lots. It is not known to what extent, how many, from where, from who, or their history.



Above: One freeze branded wild horse was captured on film during its slaughter road journey from Animals' Angels newest investigative report, Investigation Into The Slaughter Horse Industry in Washington State, May 2008.

To be fair, wild horses have always shown up at feedlots and slaughterhouses. Once an adopter is granted title to them, there's nothing more BLM can do – they can't watch the wild horses and burros forever.

## Where Do We Stand?

Currently, at the request of Congress, the Government Accountability Office has been conducting an investigation of BLMs Wild Horse & Burro Program for the last several months. However, their report is not due out until at least September, which might explain why the normally slow moving bureaucratic BLM has suddenly found an urgent need to push for Instant Titling and euthanazing wild horses both on and off the range.

With 1,000 wild horses being gathered at this very moment from the Nevada Wild Horse Range and another 1,000 being pushed through under “emergency status”, Karen Mayfield, a wild horse advocate who attended the National Wild Horse and Burro’s Advisory Meeting in Reno on June 30, 2008, has reported the Advisory Board has delegated a subcommittee of three members to have a conference call within the next 10 days to discuss euthanasia, whatever this exactly means is anybody’s guess. (65)

Does BLM or the Advisory Board have the authority to throw off the long-standing shackles Congress placed on them so long ago and issue their own decision to begin euthanasia’s in the field immediately of healthy wild horses? This is a legal option according to the laws established in the Wild Free-Roaming Horse and Burro Act, but to what extent is BLM or the Secretary of the Interior willing to defy Congress?

Today, this is where we stand.

BLMs numbers fail to add up as does often times their execution of both policy and law. Statistical analysis has clearly showed, the remaining wild horses and burros still left on public lands MUST be significantly less than BLM is reporting and the evidence greatly weighs in favor that this has been occurring for a very long time.

Compound BLMs own inflated populations, twenty-four herds found just between 2007-2008, with no one examining the validity of BLMs claims that 33,000 wild horses are indeed still out on the range, round ups continuing unabated based on these inflated population reports, establishing allowable management levels that too often fail to stand up under independent scrutiny that authorize these removals, reducing wild horse and burro populations to genetically unstable levels, introducing castration of stallions to the herds that *are* still genetically stable, PZP being injected in wild mares, no matter how small the herd, authorizing bringing in other wild horses to shore up these impossible population levels to prevent inbreeding, using misleading numbers in computer model population projections ranging from census counts to population models designed to determine if a population will “crash”, selling wild horses to anyone and sometimes just giving them away while livestock grazing fees continue to stay at rock bottom prices, the size of the cattle themselves increasing over the last 20 years by 23%, fencing and habitat fragmentation causing increasing pressure to their free-roaming ability to forage through entrapment and reduced access, wildlife populations continuing to expand despite the wildfires and drought conditions plaguing the West, a refusal of those in charge to recognize their historical or cultural significance to the public, despite this being explicitly stated as such in the 1971 Act itself, and finally, the authority for BLM to sell them under cloak and secrecy has been deemed by the agency as still not enough – because of all these things, only one thing stands crystal clear....

America's mustangs and burros are making their last stand against those who have been searching to destroy them since times long before they became protected, protections that continues to stripped to the bone.

### **Where Do We Go From Here?**

The public lands system has been inherently set up for conflict; conflict between agriculture, livestock grazing, mining, timber and gas, conflict with wildlife expansion and habitat preservation, wild horses and burros only being of value if they are removed, whether through slaughter houses, appropriations for round ups or just holding facilities, conflicts between mandates and funding demanding agencies perform miracles on a shoestring, but the biggest conflict of all is from Congress itself, passing multiple laws over the years to protect and safeguard America's irreplaceable resources while simultaneously authorizing the national banking system to use public lands and their resources, such as livestock grazing allocations, for collateral on national loans.

The BLM is currently telling the public they are between the rock and the hard place with only three options left, these being,

1. Grant BLM the authority to issue Instant Title of wild horses and burros, which would most certainly guarantee a slaughterhouse end,
2. Cut costs by shooting the now warehoused wild horses and burros or directly on the range.
3. Give BLM more money.

However, a fourth option is available, though it is hardly one BLM will recommend,

4. Investigate the accuracy, validity and credibility of their claims and actions.

If the public and Congress exercises Option 4 by demanding proof and accountability of BLMs far-fetched claims in relation to their own statistics, they will find a very simple solution waiting in the wings.

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

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

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

## References

### America's WH&B Populations-References

Statistical References Sources (Also see Appendix II)

The majority of all population figures, statistics and data utilized or quoted were taken from:

1. BLM FY2007 Wild Horse and Burro Removal, Adoption, Population, AML Table.  
[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](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)
2. BLMs Wild Horses and Burro Herd Area and Herd Management Area Statistics for FY2008, All Herd Area and HMA Statistics.  
[http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/wild\\_horses\\_and\\_burros/pls\\_herd\\_area\\_statistics/2007.Par.64770.File.dat/HAHMA2008statsnoAML.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wild_horses_and_burros/pls_herd_area_statistics/2007.Par.64770.File.dat/HAHMA2008statsnoAML.pdf)
3. BLMs Wild Horses and Burro Herd Area and Herd Management Area Statistics, All Herd Area and HMA Statistics, FY1996-FY2000  
[http://www.blm.gov/wo/st/en/prog/wild\\_horse\\_and\\_burro/wild\\_horse\\_and\\_burro2.html?](http://www.blm.gov/wo/st/en/prog/wild_horse_and_burro/wild_horse_and_burro2.html?)
4. BLMs Preliminary & Final Gather Schedules FY2006/FY2007, Preliminary Gather Schedule FY2008. Courtesy of Dean Bolstad, National Wild Horse and Burro Lead.

Additional References:

1. BLM Wild Horse and Burro Population Census, [www.blm.gov](http://www.blm.gov)
2. Bureau of Land Management Rock Springs Field Office, Adobe Town-Salt Wells Creek Herd Management Area Complex, Population Management Plan, EA # WY-040-EA07-37, pg. 4., November 2006
3. a) Department of the Interior, Bureau of Land Management Rock Springs Field Office, 1999 Environmental Assessment #WY-040-EA9-041, Wild Horse Removals  
b) Department of the Interior, Bureau of Land Management Rock Springs Field Office, 2005 Environmental Assessment # WY030-05-EA-158, Table 4, Number of Wild Horses Gathered, Removed and Remaining, pg. 16, Fall 2002, Spring 2003, Summer 2003,  
c) Department of the Interior, Bureau of Land Management Rock Springs Field Office, 2005 Environmental Assessment # WY030-05-EA-158, Table 1, pg. 5, February 2005  
d) Department of the Interior, Bureau of Land Management Rock Springs Field Office, 2006 Environmental Assessment # WY-040-EA07-37, August/September 2005, pg. 4  
e) National Program Office, 2007 Final Gather Schedule, January and July 2007
4. American Wild Horse Preservation Campaign: National Academy of Science, Wild and Free-Roaming Horses and Burros: Final Report. Committee on Wild Free-Roaming Horses and Burros, Board on Agriculture and Renewable Resources, National Research Council, National Academy Press, Washington, D.C., 1982 [http://www.wildhorsepreservation.com/resources/nas\\_report.html](http://www.wildhorsepreservation.com/resources/nas_report.html)
5. Advances in New Zealand mammalogy 1990-2000: Feral Horse, Clare J. Veltman, *Journal of The Royal Society of New Zealand*, Volume 31, 2001, pg.219-224
6. Wolfe, M.L. 1980. Feral horse demography: A preliminary report. *J. Range Mangmt.*, 33(5), 354– 360.
7. Cameron, E. Z.; Linklater, W. L.; Stafford, KJ; Veltman, C. J. 1999b: Birth sex ratios relate to Mare condition at conception in Kaimanawa horses. *Behavioral Ecology* 10: 472—475.
8. Casper Star-Tribune, BLM Trims Wild Horse Herds by Whitney Royster, August 24, 2005 <http://www.casperstartribune.net/articles/2005/08/24/news/wyoming/a7d84b25e61ce918872570660080a508.txt>

9. U.S. Geological Surveys-Biological Research Division (USGS-BRD) In Collaboration with the U.S. Bureau of Land Management, Aerial Population Estimates of Wild Horses (*Equus caballus*) in the Adobe Town and Salt Wells Creek Herd Management Areas Using an Integrated Simultaneous Double-Count and Sightability Bias Correction Technique, B.C. Lubow and J. I. Ransom, 2007.
10. “The Horse Rustlers: how scam artists abuse a federal adoption program for wild horses”, Wendy Williams, May-June 1999 [http://findarticles.com/p/articles/mi\\_m0FRO/is\\_n3\\_v131/ai\\_20601075](http://findarticles.com/p/articles/mi_m0FRO/is_n3_v131/ai_20601075)
11. Bureau of Land Management, Ely Field Office, Emergency Wild Horse Gather Plan and Preliminary Environmental Assessment for the Antelope and Antelope Valley Herd Management Areas, EA# NV-040-08-EA-04, pg. 2, November 2007
12. Bureau of Land Management, Las Vegas Field Office, Gold Butte Herd Management Area Gather Plan, EA# NV-052-06-49 and FONSI, February 2006.
13. Bureau of Land Management, Las Vegas Field Office, Lake Mead Complex Final Gather Plan, EA# NV-052-2007-69, March 2007
14. Bureau of Land Management, Battle Mountain Field Office, Shoshone Complex Wild Horse Gather, EA# NV-062-EA07-104, April 2007
15. Bureau of Land Management, Battle Mountain Field Office, Callaghan Herd Management Area Wild Horse Gather Plan, EA # NV062-02-41, May 2002.
16. Wild Horse and Burro Numbers in Holding Facilities (Report Date: February 11, 2008, Courtesy of National Program Office Wild Horse and Burro Lead, Dean Bolstad.
17. Fact Sheet on Wild Horse and Burro Program, June 17, 2008  
[http://www.blm.gov/wo/st/en/prog/wild\\_horse\\_and\\_burro/Fact\\_Sheet.html](http://www.blm.gov/wo/st/en/prog/wild_horse_and_burro/Fact_Sheet.html)
18. American Wild Horse Preservation Campaign Genetic Diversity, Management Toward Extinction/Courtesy of Wild Horse and Burro Freedom Alliance, 2000  
<http://www.wildhorsepreservation.com/resources/genetic.html>
19. Bureau of Land Management, Battle Mountain District, Tonopah Field Station, Silver Peak HMA and Paymaster HMA Wild Horse Gather Plan and Environmental Assessment EA# NV065-EA06-149, Section 1.7. Issue Identification and Scoping (6) pg. 8, September 2006
20. Bureau of Land Management, Lander Field Office, Green Mountain Common Allotment EA#WY050-EA07-153, pg. 4-59
21. U.S. Department of Agriculture, Cattle Statistics, February 2008  
<http://usda.mannlib.cornell.edu/usda/current/Catt/Catt-02-01-2008.pdf>
22. GAO, Livestock Grazing, Federal Expenditures and Receipts Vary, Depending on the Agency and the Purpose of the Fee Charged, September 2005, GAO-05-869  
<http://www.gao.gov/new.items/d05869.pdf>
23. Animal Welfare Institute, Managing For Extinction-Shortcomings of the Bureau of Land Management Wild Horse & Burro Program, pg. 14-15  
<http://www.awionline.org/pdf/managingforextinction2007.pdf>
24. Assessing The Full Cost of the Federal Grazing Program, Moskowitz, MBA, Romaniello, MS Ag. Econ., Prepared for the Center of Biological Diversity, October 2002  
[http://www.westernwatersheds.org/reports/full\\_cost/fullcost.pdf](http://www.westernwatersheds.org/reports/full_cost/fullcost.pdf)
25. Organic Consumer-2005 <http://www.organicconsumers.org/Politics/grazing062105.cfm>
26. GAO, Livestock Grazing, Federal Expenditures and Receipts Vary, Depending on the Agency and the Purpose of the Fee Charged, September 2005, GAO-05-869  
<http://www.gao.gov/new.items/d05869.pdf>
27. Fact Sheet on BLM’s Management of Livestock Grazing <http://www.blm.gov/wo/st/en/prog/grazing.html>
28. BLM Rangeland Administration System (RAS)

- <http://www.blm.gov/landandresourcesreports/rptapp/menu.cfm?appCd=6>
29. Computed from BLMs National Wild Horse & Burro Appropriate Management Levels
  30. American Wild Horse Preservation Campaign, Study In Mismanagement, Case Study #1, Wild Burros of the American West, A Critical Analysis of the National Status of Wild Burros on Public Lands, 2006, C.R. MacDonald <http://www.wildhorsepreservation.com/pdf/BurroAnalysis-2006-Public.pdf>
  31. American Wild Horse Preservation Campaign, The Numbers  
<http://www.wildhorsepreservation.com/numbers.html>
  32. American Wild Horse Preservation Campaign, Genetic Diversity and Viability, Management Toward Extinction, <http://www.wildhorsepreservation.com/resources/genetic.html>
  33. Assessing The Full Cost of the Federal Grazing Program, Moskowitz, MBA, Romaniello, MS Ag. Econ., Prepared for the Center of Biological Diversity, October 2002, pg. 30  
[http://www.westernwatersheds.org/reports/full\\_cost/fullcost.pdf](http://www.westernwatersheds.org/reports/full_cost/fullcost.pdf)
  34. Draft Nevada Wild Horse Management Plan For Federal Lands, Nevada Ecological Consulting, Inc. August 1998, pg. 30.
  35. "Bighorn Facing Smaller Habitat, Federal agency wants to reduce protected area by more than 50%", Mike Lee, Union-Tribune [San Diego], March 23, 2008  
<http://theguzzler.blogspot.com/search/label/Anza-Borrego%20Desert%20State%20Park>
  36. Oregon Department of Wildlife Website- March 2005  
<http://www.dfw.state.or.us/news/2005/march/007.asp>
  37. Bureau of Land Management, Battle Mountain Field Office, New Pass/Ravenswood and Augusta Mountains HMAs, Burned Area Wild Horse Removal, EA#NV062-EA07-188, Appendix D, pg. 70, October 2007.
  38. Bureau of Land Management, Ely District Field Office, Dry Lake Complex Wild Horse Gather, EA# NV-040-07-002, October 2006.
  39. Bureau of Land Management, Tonopah Field Stations, Monte Cristo Wild Horse Complex, NV-040-05-030, June 2005.
  40. Bureau of Land Management, Battle Mountain Field Office (split proposal between Winnemucca Field Office), New Pass/Ravenswood and Augusta Mountains HMAs, Burned Area Wild Horse Removal, EA#NV062-EA07-188, October 2007.
  41. Bureau of Land Management, Ely and Elko Field Office, Final Environmental Assessment for the Antelope and Antelope Valley Herd Management Areas Emergency Wild Horse Gather Plan, EA#NV-040-06-EA-04, Appendix III, pg. 31/32, November 2007.
  42. Contraception of Wild Horses with PZP Immunocontraceptives, Frequently Asked Questions, Allen T. Rutberg, Ph.D., Tufts Center for Animals and Public Policy, June 2006.
  43. Bureau of Land Management, Las Vegas Field Office, Nevada Wild Horse Range Herd Management Plan, FONSI, June 2008
  44. Nevada Commission for the Preservation of Wild Horses, April 7, 2005  
<http://www.wildhorse.nv.gov/main/april05.pdf>
  45. 1998 Range Issues and Problems with the Wild Horse and Burro Act and Its Implementation, Field Hearing, Subcommittee on National Parks and Public Lands, 50-579CC  
[http://commdocs.house.gov/committees/resources/hii50579.000/hii50579\\_0.HTM](http://commdocs.house.gov/committees/resources/hii50579.000/hii50579_0.HTM)
  46. Environmental Working Group's, Farm Subsidy Database,  
<http://farm.ewg.org/farm/regiondetail.php?fips=32000&summllevel=2>
  47. Environmental Working Group's, Farm Subsidy Database, Dean & Sharon Rhoads  
<http://farm.ewg.org/farm/persondetail.php?custnumber=009406838>
  48. Kleppe v. New Mexico, June 17, 1976 <http://www.law.umkc.edu/faculty/projects/ftrials/conlaw/kleppe.htm>
  49. CRS Report for Congress, Wild Horse and Burro Management, Bety A. Cody, March 1997, 97-370 ENR, <http://www.ncseonline.org/nle/crsreports/biodiversity/biodv-33.cfm>

50. Statement By Karen A. Sussman, President, International Society for the Protection of Mustangs and Burros, report prepared for the Subcommittee on National Parks and Public Lands, Chairman James V. Hansen, June 5, 1998 <http://www.ispmb.org/congressional.html>
51. GAO, Rangeland Management, Improvement Needed in Federal Wild Horse Program, August 1990, GAO/RCED-90-110
52. Public Employees for Environmental Responsibility, Horses to Slaughter – Anatomy of a Cover Up within the BLM (1997-04-01) [http://www.peer.org/pubs/whitepapers\\_id.php?row\\_id=14](http://www.peer.org/pubs/whitepapers_id.php?row_id=14)
53. Horses Criminal Case Shut Down, Martha Mendoza, Associated Press, <http://igha.org/BLM12.html>
54. Statement of Larry Johnson, April 10, 2001, Senate Subcommittee on Energy and Natural Resources, Restoration of ‘Threatened Watersheds’.  
[http://www.senate.gov/comm/environment\\_and\\_public\\_works/general/107th/joh\\_0410.htm](http://www.senate.gov/comm/environment_and_public_works/general/107th/joh_0410.htm)
55. Public Employees for Environmental Responsibility, Horses to Slaughter – Anatomy of a Cover Up within the BLM (1997-04-01) [http://www.peer.org/pubs/whitepapers\\_id.php?row\\_id=14](http://www.peer.org/pubs/whitepapers_id.php?row_id=14)
56. Horses Criminal Case Shut Down, Martha Mendoza, Associated Press, <http://igha.org/BLM12.html>
57. Investigative Report, Case Study, Suspected Illegal Exports of Geldings by Non-Slaughter Shipment From New Mexico to Mexico, V.J. Patton, November 2007  
[http://www.kaufmanzoning.net/horsemeat/Investigation-Gelding%20Exports\\_Final\\_VJP\\_11-13-2007.pdf](http://www.kaufmanzoning.net/horsemeat/Investigation-Gelding%20Exports_Final_VJP_11-13-2007.pdf)
58. HSUS and Others Seek Injunction to Halt USDA in Its Attempt to Buck Congress on Horse Slaughter, February 2006, [http://www.hsus.org/pets/pets\\_related\\_news\\_and\\_events/usda\\_threatens\\_horse\\_slaughter.html](http://www.hsus.org/pets/pets_related_news_and_events/usda_threatens_horse_slaughter.html)
59. ‘Trail’s End for Horses: Slaughter, by Martha Mendoza, Associated Press, January 1997,  
[http://www.wildhorsespirit.org/1-5-97\\_martha\\_mendoza\\_trails\\_end\\_horses.htm](http://www.wildhorsespirit.org/1-5-97_martha_mendoza_trails_end_horses.htm)
60. American Wild Horse Preservation Campaign, The Story Behind the Burns Amendment  
[http://www.wildhorsepreservation.com/resources/burns\\_story.html](http://www.wildhorsepreservation.com/resources/burns_story.html)
61. BLM Note Re: Sale of Wild Horses and Burros  
[http://www.blm.gov/wo/st/en/prog/wild\\_horse\\_and\\_burro/sale\\_authority.html](http://www.blm.gov/wo/st/en/prog/wild_horse_and_burro/sale_authority.html)
62. American Wild Horse Preservation Campaign, News & Alerts, May 19<sup>th</sup>, 2005, BLM announces resumption of sales, with limitations to prevent slaughter
63. “185 Wild Horses Dead” by Linda Hussa, Quarter Horse News,  
[http://quarterhorsenews.com/index.php?option=com\\_content&task=view&id=37&Itemid=69](http://quarterhorsenews.com/index.php?option=com_content&task=view&id=37&Itemid=69)
64. United States Geological Survey (USGS), In Collaboration with the U.S. Bureau of Land Management, Aerial Population Estimates of Wild Horses (*Equus caballus*) in the Adobe Town and Salt Wells Creek Herd Management Areas Using an Integrated Simultaneous Double-Count and Sightability Bias Correction Technique (Lubow and Jason I. Ransom, 2007), pg. 7.
65. Karen Mayfield, Personal. Comm. 7/01/08