Remember the Burros

By Charlotte Roe & Laura Ford

In the Canyonlands of Utah and the Alamo, Big Sandy or Havasu ranges of Arizona, with luck and patience, one might spot wild burros browsing along the harshly beautiful buttes and desert ridges. For short takes they venture toward the watershed. They also dig deep for new springs which are eagerly shared by bighorn sheep and other wildlife. When jennets are birthing or raising foals, they keep a wary eye out for the occasional mountain lion. For hundreds of years, these wild burros and their kin in other Western lands have persevered against devilish heat, biting winds, drought and predation. Freedom to roam and bond is their birthright. Unless their story becomes known, their demise will come far too soon. The burros' most dangerous adversaries are not four-legged predators, but those with two legs wielding spreadsheets.

Of the many species threatened by human depredation, few are as misunderstood and dismissed as the donkey. Also known as burros on public lands in the US and south of the border, they've long served as farm workers, livestock guardians, haulers, backcountry packers, companion animals, healers of the land. Their light footprint and capacity for giving is unsurpassed. Centuries ago, they were buried with kings. Today humans bound to special interests are hounding these gentle animals out of existence.

A Sinister Trade

Every year upwards of 5 million donkeys are slaughtered and their hides boiled to produce ejiao. China's demand for this traditional medicine and luxury beauty product created a global shortage that has increased the value for donkey traders by 2500 percent. The donkey hides are massively exported from Africa and Asia, where many are stolen from rural families who are unable to replace them due to scarcity and high cost. North and South America are also key targets: the US is now the third largest exporter of donkeys for slaughter. Because the hides are valuable regardless of health, weight or hoof conditions, these animals are treated horrifically. Some are skinned alive.

The black market trade places wild burros as well as domestic donkeys in peril. Yet the Bureau of Land Management (BLM) - the principle agency tasked with protecting burros on our public lands - keeps slashing their chances for survival.

Powering Extinction

The Bureau systematically destroys burro habitat and genetic health in its drive to promote commercial livestock grazing and mining on our public lands. In 2013, when the population of wild burros in the West was 5841, the National Academy of Sciences (NAS) advised the BLM that given the small, fragmented burro population, "removing burros permanently from the range could jeopardize the genetic health of the total population." Disregarding science, public concerns and the law, the Bureau's goal is to reduce the current total population to 2,106 burros free and wild on America's public lands. Millions of livestock keep grazing the same lands unhindered.

By this point the US will have met key criteria the IUCN set for burros to be considered an endangered species: the government will have reduced their population by more than 80 percent and left fewer than 2500 adult males on the range.

The BLM justifies its removal campaign by claiming that herds are overpopulating and must be drastically whittled to preserve "thriving natural ecological balance." These claims are based on misleading figures and prejudice, not evidentiary data. The Wild Horse and Burros Act, signed unanimously by Congress in 1971, defines free-roaming burros as protected wildlife and states "they are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Yet US land management agencies treat burros as trespassers and invasives. Shoring up this bias, they ignore the severe impacts of commercial public land uses – ever expanding outdoor recreation, fast-tracked renewable energy projects, mineral mining and livestock grazing. Disregarding these impacts leaves the burros and wild horses as fall guys. And fall they do.

The Numbers Racket

The BLM governs wild burro HMAs with population targets termed Appropriate Management Levels (AMLs). Supposedly the number of animals the land can sustain, AMLs are actually quotas aimed at bolstering commercial cattle and sheep stocking

rates while evicting wild equines. Dr. Gus Cothran, a leading equine geneticist, maintains that a wild horse and/or burro herd of 150-200 animals is the minimum required to insure a genetic viability. Currently three quarters of burro HMAs have an AML of under 50.

BLM management actions are based on wildly speculative population numbers. Its annual estimates come from aerial surveys and population modeling that, on March 1, multiply the previous year's population by the past estimated growth rate. The Bureau assumes fertility rates for burros are 20 to 25 percent, with no documented baseline. Its count includes foals yet to be born and young burros incapable of reproducing for several years.

This model was designed for horses and is based on a July-August foaling period, although the BLM acknowledges burros have no defined foaling season. Research on the reproductive biology of Equus Asinus is limited, yet studies indicate females first foal at 5-6 years, have longer gestation periods than horses, and may give birth every other year. In these fragile hers, 70 percent of foals do not survive; birthing and the early postnatal period makes burros vulnerable to predator attacks. Burro data on foal and yearling survival rates derived from Freedom of Information (FOIA) requests suggest a 7-9 percent annual growth rate, not the 15 to 20 percent herd growth the BLM projects.

The spreadsheet model also discounts other growth rate factors such as age and sex distribution, age-specific reproductive and survival rates, and predation. It omits the impacts of increasing, multiple uses of resources within the HMA. One is the exploding recreation including off-road vehicle use that stresses wild burros, driving them further away from resources they need to stay healthy and forcing them into less desirable areas. Another is lithium mining, which has a huge footprint. Energy development projects such as wind and solar farms, now being fast-tracked, eat up more wild habitat.

The methods that BLM utilizes to estimate HMA populations are flawed, inconsistent and unreliable. Aerial surveys make it harder to observe burros due to their similarities in appearance and habits of traveling in small groups that easily scatter. To compensate, the BLM now adjusts its final count by 25 percent to account for those "present but not seen," while in the past it only added an average of 5 percent.

A big twist in the numbers game comes from “nuisance gathers,” the BLM’s term for rounding up and removing wild burros that wander outside HMAs but are included in the herd count. Because the Bureau typically does not subtract those removed from the annual HMA population estimates, they are double-counted. For example, the 2020 estimate of the Cibolo-Triago HMA in Arizona was 616. Despite 570 “nuisance” burros being removed, the BLM lists the 2022 population as 378, and has removed an additional 189 burros that wandered off the HMA.

Taking Down the Black Mountain Burros

The 2022 assault on the 1.1-million-acre Black Mountain HMA, the largest, most genetically robust burro population, illustrates the Bureau’s flawed methodology. In 2021, with an estimated population of 2012, the BLM removed 500. Following an aerial survey in November, the Bureau inflated the population to 2976, of which it has already removed 1800. These evictions represent over 10 percent of the total US wild burro population. With plans to remove even more, the BLM will leave nothing but a fragmented herd, now a shadow of its original size. Those removed were fit and healthy, despite the claim that they had to be captured for their own good.

Between February 2022 and April 2023, the BLM removed 1735 burros from Black Mountain in several roundups leaving some 1242 on the range. Still, the Bureau followed up with a population estimate of 1674, and has scheduled an additional roundup of 1000 in January/February 2024, without having conducted another aerial survey as recommended by the US Geological Survey. Doing so could potentially leave the HMA below the already dangerously low AML.

Meanwhile the privately owned cattle still graze, consuming 72 percent of the forage and running down the fragile desert land. In less than one year thousands of free-roaming burros have been removed from this homeland and sent to grim holding facilities. If adopted, many will go to people ill prepared to care for them or intending to send them down the slaughter pipeline.

Targeting the Canyonlands Burros

Left alone in their remote desert landscape, the Canyonlands wild burros have maintained a stable population for many years. Many factors play into this natural balance, including scarce water resources, harsh terrain, and the presence of predators. Yet the BLM aims to drive out the long eared ungulates.

The Bureau's environmental assessment (EA) justification is full of holes. Based on a 2002 aerial survey and an outdated management plan, it estimates there are 151 wild burros in the 77,311 acre Canyonlands HMA - the exact number that appeared under March, 2015 program data, which confirms how baseless is the population modeling. Thirty-nine percent of those burros were located outside the HMA, indicating that the herd already met the skinny AML target. The EA proposes to reduce the population by half, although doing so will create a genetic crisis that Dr. Cothran has termed "severe population contraction." On pages 17-18 of the EA, the BLM acknowledges its underlying aim of slashing wild burro populations is to maintain the "preferential level of livestock grazing."

The BLM knowingly flouts science and the law by prioritizing the interests of cattle ranchers. The 1971 Wild Free-Roaming Horses and Burros Act couldn't be clearer. It stipulates that wild horses and burros are the "principal users of public lands," to be protected "where they are presently found."

Trouble for Big Sandy, Alamo and Lake Havasu Burros (Three Rivers Complex)

The BLM's August 2023 EA for the Three Rivers Complex in Arizona outlines plans to remove 1794 burros from the three HMAs. The Alamo, Big Sandy and Havasu burros are historically important and genetically irreplaceable. BLM data demonstrates they are some of the last wild burro herds that are not already in a downward, genetically fragile spiral. Yet the planned roundups would each of the HMAs below the numbers needed for genetic viability; only 185 jennies would be allowed in all three HMAs.

Because of constant migration between HMAs, true population numbers are almost impossible to obtain in a complex such as Three Rivers. This fluctuation, which the EA terms *seasonal movements of the burros within the HMA's*, means that over time, annual estimates and aerial surveys can produce results that vary in the hundreds, even

thousands. Yet these shaky population values are used to determine removals in order to reach, and retain, the artificially low AML quota. The ongoing fluctuation in population numbers can put an HMA within AML one day, and then under or over AML a month later. The burros temporarily residing outside of HMA boundaries are subject to removal at any time in a "nuisance gather," where the only document required for removal is a "written request" from the BLM's state specialist. Since 2020, 37 percent of wild burros removed in Arizona were captured using this stroke of the pen.

Despite 25 livestock grazing allotments already within, or overlapping, the Big Sandy HMA, an EA to reactivate grazing permits in the adjoining Palmerita Ranch Allotment was simultaneously released. This plan would add livestock grazing to the high desert range after a pause of three decades. Neither EA referenced the other, although the ranges intersect at key points, and plans call for new fencing and other infrastructure that would limit burros' movement and potential access to water resources. Neither considered the impact that the lithium mine in process for Big Sandy would have on the burros or other wildlife.

Misleading Counts

The NAS's 2013 report found a substantial proportion of HMA estimates and adoptions published by BLM's national office did not fit those received from field offices. The NAS also reported that links between the national statistics and actual population-size surveys, the foundational data of all estimates, are obscure.

Such profound errors undergird the Bureau's plans to decimate the Marietta Wild Burro Range, the only HMA dedicated exclusively to wild burros in the US. Based on a March 2020 inventory, the BLM estimated the 2022 burro population as 688 on its national data website - an inconceivable 256.5 percent increase from the 2018 population of 193. The Nevada field office data differs radically: its 2022 aerial survey documented only 421 burros, with 232 outside the HMA. BLM plans to remove 479 burros from the 64,466 acre range and surrounding areas, potentially leaving this unique Wild Burro Range void of any of the long eared animals it was created to protect.

These factual errors and deceptive numbers are carried over year after year and have inflated population estimates to the point where no one knows how many burros still

exist on our public lands. The BLM's total wild burro population estimate of 17,780 is simply a shot in the dark derived from sham methodology and zero accountability.

The Roundup Toll

The Bureau's accelerated removals increase the casualties. In 2021, the BLM removed 1918 wild burros from their designated habitats on public lands; in 2022 it removed more than 3000 from five HMAs. Using helicopters, contractors frighten and stampede the animals into traps, creating havoc and great harm to these gentle equines. Unlike horses, when faced with unknown danger, donkeys often stand in place to take stock or scatter to try and evade their persecutors. In response, wranglers aggressively chase and rope the burros and resort to electric prods. The Bureau's own animal welfare assessment chronicled an example of one contractor hitting, kicking and beating a captured burro during a 2022 roundup. Because observers are increasingly banned, the extent of this abusive treatment is unknown.

The trauma induced by roundups and captivity triggers dormant infections, respiratory disease and immune system failure. Capture stress is life threatening, often resulting in hyperlipidemia which can occur rapidly or over time as the stress persists. Because a necropsy is required to diagnose hyperlipidemia, the manner of death is routinely listed as unknown, chronic failure to thrive, or simply found dead. Yet necropsies reported in FOIAs reveal jennies that died from hyperlipidemia as being in good body condition, and often cite "changes associated with a variety of stresses" as contributing to mortality.

The 2016 Sinbad roundup left 31 burros dead from a herpes virus; 24 more died after the 2022 roundup, most within 30 days and some within only hours. Shortly after the 2022 Blue Wing roundup in Nevada, 45 burros died - the majority from hyperlipaemia, a blood disease triggered by stress and dietary disorder. Contractors had transported the captives from Sinbad and Blue Wing to the notorious Axtell corrals in Utah, where the BLM's own assessments have documented multiple violations of animal welfare rules - and where no independent observers were allowed. Of 219 "nuisance" burros removed in Nevada, 25 percent are now dead. One half perished within the first few months of captivity.

BLM holding pens are overcrowded, filthy, and typically way stations for the road to slaughter. As of February 2023, the Bureau was warehousing over 2,638 burros in off-range pens at a cost to taxpayers of more than $1,825 per animal each year. It adopts out younger burros for a fee of $125 without serious vetting or followup monitoring. The majority of those offered for adoption are untrained. Burros over 10 years of age, or those passed up for adoption three times, are sold for $25 or less under "sale authority," based on a nebulous amendment to the 1971 Act. In 2019 the BLM initiated an Adoption Incentive Program (AIP) which pays $1,000 to "qualified adopters" to title a captured burro, with no followup monitoring. Advocates have discovered that many AIP burros, already marked as excess baggage, enter the slaughter pipeline.

Healers of the Land

Burros in the wild are part of an intricate web that benefits the ecology. Like other wild equids, they stay on the move and have radically different land impacts from livestock. Cattle are sedentary and like to monopolize water sources, trampling fragile plants and soil surrounding riparian areas. Burros remain on guard against predators; they'll drink and move to higher ground No evidence says they compete with livestock or wildlife for forage. On the contrary, burros browse on coarser vegetation and remove dead-stem grass layers. Cattle that graze in areas with wild burros have been observed to gain weight, since equids do not fully digest seeds, but spread them in what researcher Dan Rubenstein calls a "facilitative relationship" with ungulates.

Burros fertilize the land through their widely spread droppings, whose intact seeds are a crucial food source for many birds and insects. They graze down brush and other fire-prone vegetation. In a study of wild burro grazing in the Mojave desert, Scott Abella of the University of Nevada Public Lands Institute found that cessation of their grazing increased invasive species.

Biologist Erik Lundgren from the University of Technology Sydney studies the ecological impact of Death Valley's wild burros, whom he discovered digging water wells over a meter deep which attract a myriad of other species, among them bighorn sheep. Over time they become vegetation nurseries, bringing resilience to the desert ecosystem. "You go out to these sites and the only surface water comes from these excavations by wild burros, where they've dug out the soil and vegetation to make pools," Lundgren

says. “And it’s really the only water in many of these landscapes. So my first question is: What happens when you remove the animals keeping these wells open?”

Running Down the Range

Like wild horses, burros are targeted for removal in large part because a small but powerful group of ranchers who profit from grazing permits want them gone. While the Bureau scapegoats wild equids for range damage, it permits commercially owned cattle and sheep to graze our public lands barren. Intense industry lobbying and internal pressure from corrupted mid-to-high level officers underlie the BLM’s decisions. This politicization of public land stewardship is a classic case of regulatory capture. It harms the burros, American taxpayers and the range ecology.

The welfare ranchers want all they can get. Over 2 million cattle and sheep graze on Western public lands, compared to 17,780 wild burros, according to BLM’s inflated population estimates. Livestock grazing on public lands enjoys enormous government subsidies. The monthly cost to graze a cow/calf pair on federal lands equals the cost of a can of dog food and is less than 10 percent of the going price of a private land lease. In the arid and semi-arid climates of the American West, cattle trample soil crusts. They congregate by riparian areas, damaging sensitive vegetation and polluting the water. They do great harm to wildlife, not only by competing for forage, but also by triggering government programs to slaughter predators. Taxpayers absorb the indirect costs of public grazing, including extermination programs, road construction, aerial hay drops for cattle, increases in invasive species and wildfire hazards, water pollution, the destruction of fish, wildlife and native plant species, habitat loss, and desertification.

What Can Be Done

Change will only happen when citizens insist that land management agencies act to preserve, not harass and eject these threatened animals. The Department of Interior needs to start putting the goals of the 1971 WFRHB Act to work. That means ending traumatic helicopter roundups for burros and wild horses. It requires halting the removal system and “zeroing out” – the Bureau’s term for its decisions to close 41 percent of habit designated by law for wild equids. It means rewilding the tens of thousands of captive burros and mustangs now languishing in holding pens; establishing a wild burro range exclusive of livestock in Arizona’s Black Mountain region; allowing the return of predators; ending the BLM’s corrupt Adoption Incentive Program.

Congress needs to pass the SAFE Act, prohibiting the export of equines for slaughter, and Ejiao legislation to ban the sale or transport of ejiao in interstate or foreign commerce.

Most critically, the BLM must revise its arbitrary population quotas (AMLs) and end a forage allotment system that privileges cattle and shortends wild equids, while permitting millions of commercial livestock to overgraze public lands as mining, oil and gas further deplete soil and water resources. The Administration's climate commitment - protecting 30 percent of America's lands and waters by 2030 - will only work if soil health, wildlife and habitat regeneration are prioritized. The Bureau must stop attacking wild horses and burros with absurd claims that they harm the range ecology.

It's time to start protecting and respecting our long-eared allies. These wise, humble animals do not deserve to be evicted from their lawful homes and skinned for their hides. Burros gave their blood and muscle to building the West. Their endangered kin are lifelines for communities around the world. They nurture wild places. They are not disposable objects. They are sovereign residents on the land where they roam. For the natural balance and the good of all, they need to stay home free on the range.

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