



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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February 4, 2010

Jim Kenna
Arizona State Director
Bureau of Land Management
One North Central Avenue, Suite 800
Phoenix, AZ 85004-4427

Re: Burro Capture in the Black Mountains

Dear Mr. Kenna:

I value our close working relationship and spirit of cooperation we have developed, and I appreciate the opportunity for open, frank communication. I have been briefed by our Kingman Region staff about a burro gather underway in the Black Mountains. We applaud all BLM efforts to remove excess burros from public lands. This is certainly true for the Black Mountains, which contain an important population of bighorn sheep. For this Black Mountains gather, however, we urge the BLM to consider removing a greater number of burros than currently targeted. The reasons for this request are described below.

The AML for burros in the Black Mountain Ecosystem was established at 478 animals in the 1996 Black Mountain Ecosystem Plan. The BLM's 2005 census estimated the population for the HMA at 434 adults and 136 juveniles. The 2007 census showed a population of 504 adults. Based on a 15% recruitment rate, the BLM estimated the 2009 population level at 715 adults. The estimated number of juveniles is unknown to us.

In the recent Determination of NEPA Adequacy completed by BLM's Kingman Field Office, BLM's local Wild Horse and Burro Specialist advocated the capture and removal of 325 burros from the Black Mountain HMA - which would bring the HMA into compliance with the federally approved AML. However, only 100 burros are currently targeted for removal.

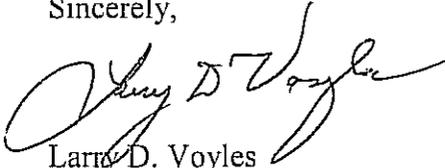
With the removal of only 100 burros, the burro population in this HMA will continue to exceed AML by an estimated 137 adults and an unknown number of juveniles. At a recruitment rate of 15% per year, the burro population in the Black Mountains will swell to roughly 935 animals by 2012 - exceeding AML by 457 animals, reaching nearly 200% of AML.

Unless remedied, this may result in negative effects to habitat utilized by desert bighorn sheep found in the Joint Management Area of the Black Mountain Ecosystem complex. Exacerbated by long-term drought, increased competition with burros for forage and habitat components is potentially contributing to the lack of recovery in the Black Mountains desert bighorn sheep population.

In light of these conservative population predications, we strongly recommend that the Bureau of Land Management expand the scope of the current burro capture taking place in Black Mountain HMA. Rather than the 100 animals targeted for removal in the current effort, we advocate removing the recommended 325 animals – as long as this action would not prevent burro removals from other HMAs planned for 2010.

I appreciate your time and consideration, and your staff's time and consideration, relating to this important matter.

Sincerely,



Larry D. Voyles
Director

LDV:TB:cc

cc: Mr. Robert Posey, Region 3 Supervisor
Mr. Trevor Buhr, Region 3 Habitat Program Manager
Mr. Josh Avey, Habitat Branch Chief
Ms. Laura Canaca, Project Evaluation Program Supervisor
Mr. Codey Carter, Land and Resource Planning Coordinator