United States Department of the Interior
Bureau of Land Management

Management Evaluation
Bullfrog Herd Management Area

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BLM

Tonopah Field Office

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INTRODUCTION

The Bullfrog Herd Management Area (HMA) is in the northern Mojave Desert, approximately 90 miles southeast of Tonopah, Nevada, in Nye County, and is managed by the Bureau of Management (BLM) Tonopah Field Office (TFO). The eastern edge of the HMA borders the Nevada Testing and Training Range (NTTR), and the western border neighbors Death Valley National Park. Burro movement between the HMA and the NTTR has been observed, and similar movement between the National Park and the HMA is likely to occur. The southern border of the HMA is the Battle Mountain District boundary, which borders the Southern Nevada District. The town of Beatty, Nevada (pop. 596 as of 2022) lies in the center of the HMA, and United States (U.S.) Highway 95 splits the HMA into eastern and western portions. Most of the burro population resides in the western side of the HMA with some burros residing outside of the HMA boundaries to the south and west. The HMA is approximately 157,180 acres in size, with land status as shown in the following table:

Table 1. Bullfrog HMA Land Status

Bullfrog HMA Land Status		
Ownership	**Acres**	**Percent of HMA**
BLM	146,701	93%
Private	10,479	7%
Totals	**157,180**	**100%**

Elevations within the HMA ranges from a high of 6,031 feet at Bare Mountain to a low of 3,095 feet south of Beatty. The geophysical configuration of the area consists primarily of north-south trending mountain ranges with intervening valleys and playas. Vegetation varies from Mojave Desert shrub communities at lower elevations to salt desert and blackbrush (*Coleogyne ramosissima*) communities at higher elevations. Typical species at lower elevations include creosote bush (*Larrea tridentata*), white bursage (*Ambrosia dumosa*), shadscale (*Atriplex confertifolia*), bud sagebrush (Picrothamnus *desertorum*), winterfat *(Krascheninnikovia lanata*), black greasewood (*Sarcobatus vermiculatus*), squirreltail (*Elymus elymoides*), and desert needlegrass (*Achnatherum speciosum*). The current HMA boundary is nearly identical to the original Herd Area boundary established in 1986, with minor differences due to mapping corrections. The area is unique in the Battle Mountain District for its extreme close proximity to the public, environmental challenges, and the subsequent conflict between fast-growing wild burro populations and other resources of the local community.

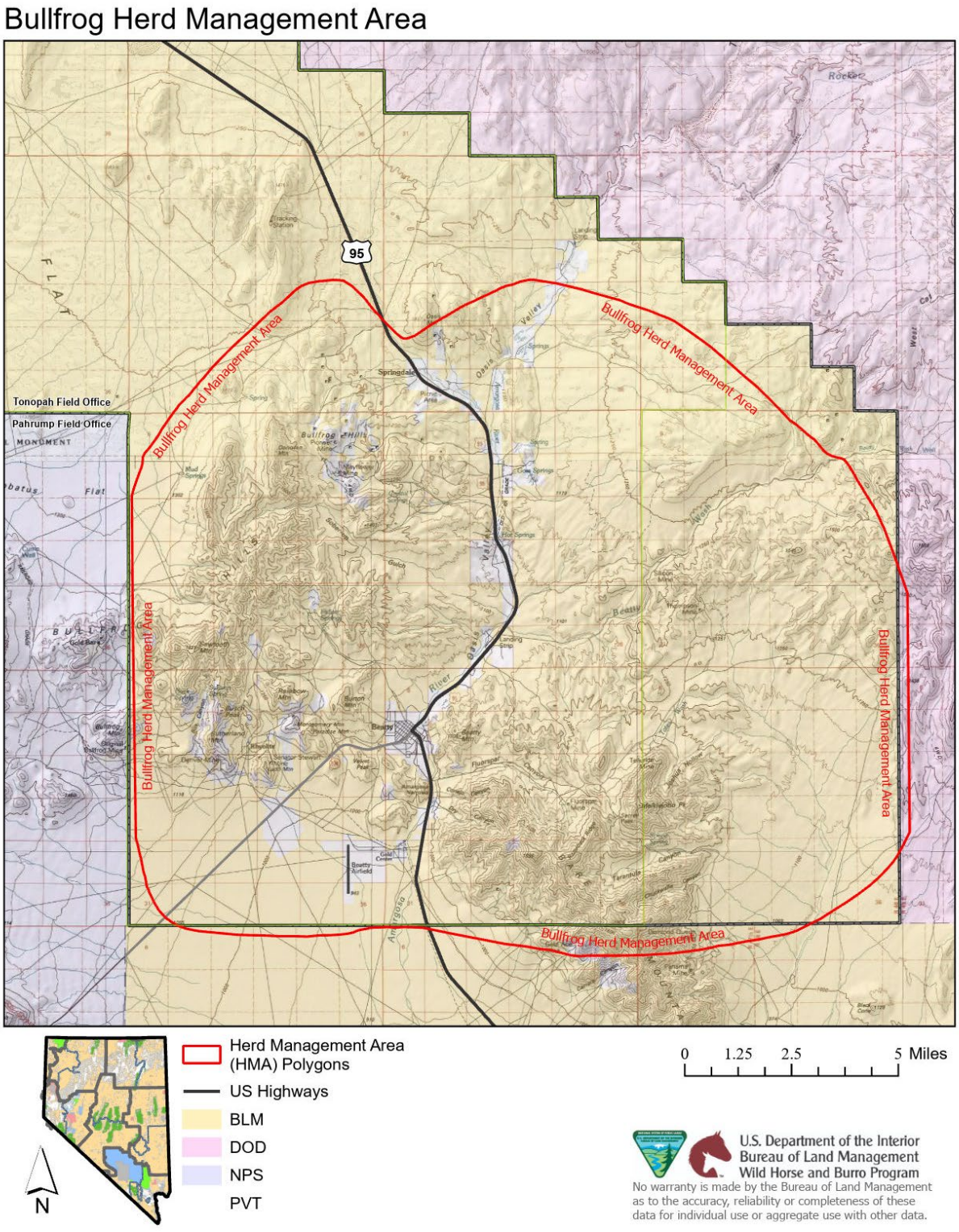

Figure 1. Map of the Bullfrog Herd Management Area.

CLIMATE

Bullfrog HMA receives approximately 3 to 6 inches of precipitation a year, much of which arrives as snowfall in the highest elevations during the winter and rain at low elevation, with thunderstorms during summer months (West Regional Climate Center, accessed 8/27/2024). Drought is a natural part of much of Nevada's climate and follows a cycle of 5 to 7 dry and 2 to 3 wet years. This presents challenges for management of wild burros, as the nutrition and water available within suitable wet years may bolster a population that is unsustainable in dryer years. During the years of intense and prolonged drought, those elevated populations of wild burros struggle to find water and nutrition required to maintain adequate body condition score. The United States Drought Monitor tracks drought conditions from abnormally dry to exceptionally dry for Nye County, NV, which encapsulates the entirety of Bullfrog HMA (Figure 1). Nye County experienced an elevated level of drought from late 2020 into 2023, categorized as D4 or Exceptional Drought. Though D3, or Extreme Drought, has been observed multiple years in the past two decades of recording, the severity of impact to the HMA appears to be escalating.

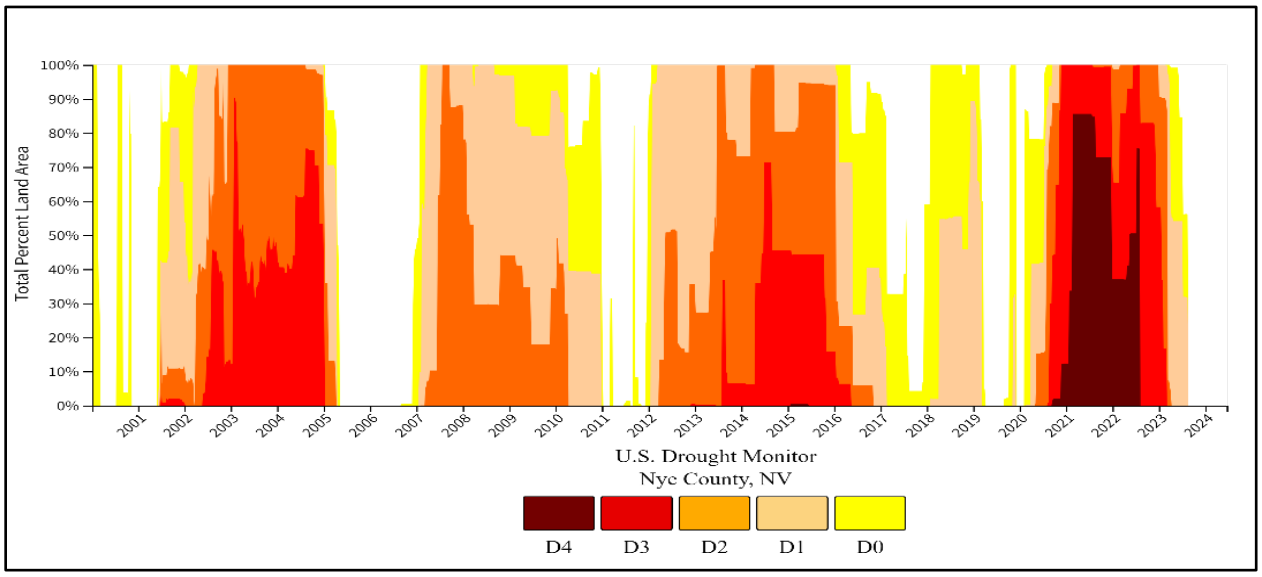

Figure 1: Percent Area of Nye County, NV experiencing drought. Accessed on U.S. Drought Monitor. D4: Exceptional Drought, D3: Extreme Drought, D2: Severe Drought, D1: Moderate Drought, D0: Abnormally Dry. https://droughtmonitor.unl.edu/

LAND USE PLAN CONFORMANCE

- Approved Tonopah Resource Management Plan (RMP) and Record of Decision dated October 1997

  The Action Alternatives are in conformance with the Wild Horse and Burro Objectives of the Tonopah RMP Record of Decision dated 1997. Pertinent excerpts from that document are the following:

  Objective: To manage wild horse and/or burro populations within Herd Management Areas at levels which will preserve and maintain a TNEB consistent with other multiple-use objectives (page 14).

Continue the following management determinations:

- Manage wild horses and/or burros in 16 HMAs listed in Table 3 of the RMP.
- Manage wild horses and/or burros at AML or interim herd size (IHS) for each HMA outlined in Table 3. Future herd size or AMLs within each HMA will be adjusted as determined through short-term and long-term monitoring data methods as outlined in the *Nevada Rangeland Monitoring Handbook* and BLM Technical References.
- When the AML is exceeded, remove excess wild horses and/or burros to a point which may allow up to three years of population increase before again reaching the AML.

Within the 1997 RMP the definition of AML is given as "*the maximum number of wild horses and/or burros to be managed within a herd management area and has been set through monitoring and evaluation or court order*" (page 15).

- Tonopah Resource Management Plan and Record of Decision Plan Maintenance Sheet No. 25 dated April 2008: adjusted boundaries of Montezuma and Razorback allotments to remove from livestock use, areas within the Bullfrog HMA and in desert tortoise habitat.
- Montezuma Complex Final Multiple Use Decision of 2007
- BLM Handbook H-4180-1 - RANGELAND HEALTH STANDARDS of January 19, 2001.
- The Tonopah Field Office's Final Multiple Use Decision of June 8, 1994

RELATIONSHIP TO REGULATIONS, PLANS, AND POLICY

- The Federal Land Policy and Management Act of 1976 (FLPMA) requires that an action under consideration be in conformance with the applicable BLM land use plan(s), and be consistent with other federal, state, and local laws and policies to the maximum extent possible.
- The Wild Free-Roaming Horses and Burros Act of 1971 (WFRHBA)
    - The WFRHBA mandates the BLM to "prevent the range from deterioration associated with overpopulation", and "remove excess horses in order to preserve and maintain a thriving natural ecological balance and multiple use relationships in that area".
    - Also the WFRHBA sec 1333 (b)(1) states: "The purpose of such inventory shall be to: make determinations as to whether and where an overpopulation exists and whether action should be taken to remove excess animals; determine appropriate management levels of wild free-roaming horses and burros on these areas of public land; and determine whether appropriate management should be achieved by the removal or destruction of excess animals, or other options (such as sterilization, or natural control on population levels)."

WILD BURROS

The Esmeralda-Southern Nye Resource Management Plan, Record of Decision (ROD) was signed on October 10, 1986, and established the original boundaries of the Bullfrog HMA. The Tonopah Field Office's Final Multiple Use Decision of June 8, 1994, established an Appropriate Management Level (AML) in the Razorback Allotment portion of the Bullfrog HMA at 53

burros. With the Montezuma Complex Final Multiple Use Decision (FMUD) of 2007, this was changed to a range of **58 to 91 burros** for the entirety of the HMA. The AML was established in consideration of the naturally low precipitation and subsequent low producing vegetation communities, drought cycles, and lack of available water for wild burros. The AML was also established at that level to protect key forage, prevent wild burro emergencies, and protect habitat for threatened and sensitive wildlife species. There is no AML for horses, which are nearly nonexistent in the HMA, because the Bullfrog HMA provides suitable habitat for wild burros but not for wild horses. Periodically a horse is observed on the HMA, having likely moved in from neighboring HMAs, and there have been several mules documented in historic censuses. In 2024, one mare was observed at Mud Springs.

The most recent population census of Bullfrog HMA was conducted in April 2024 and recorded **966** burros associated with the HMA. This is **1665%** over the low end of AML, which is 58 burros.

The following table indicates the estimated wild burro population as well as removals from the HMA each year since 1986:

Table 2. Estimated Wild Burro Population and Removal by Year.

Estimated Wild Burro Population by Year								
Year	Est. Pop. of Burros	Number Removed from the HMA	Year	Est. Pop. of Burros	Number Removed from the HMA	Year	Est. Pop. of Burros	Number Removed from the HMA
1986	47	78	1999			2012	195	77
1987			2000	28		2013	154	
1988	256		2001			2014	181	
1989	61		2002			2015	203	44
1990	203	64	2003			2016	197	
1991	130		2004			2017	620	
1992	94		2005	34		2018	738	404
1993	227	57	2006	41		2019	397	690
1994	432		2007	82	12	2020	138	
1995	183	492	2008	87		2021	164	
1996	17	417	2009	102		2022	189	2
1997			2010	125		2023	217	
1998	20	1	2011	148		2024	966	

The table above was created using formal wild burro population inventory data, as well as ground-based observations and estimates in years that a formal population inventory was not conducted. The table reflects the total number of wild burros, adults and foals. The estimated growth rate for this HMA is 18% per year. Previous gathers and removals of excess wild burros were conducted in 2019, 2018, 2015, 2012, 2007, 1996, 1995, and 1990 resulting in lower population numbers the following years. Due to extreme drought conditions in the 1990s, the BLM conducted two emergency gathers within and around this HMA. The BLM has also

conducted nuisance and emergency gathers due to hazardous conditions arising from the limiting nature of the Mojave Desert ecosystem, periods of consecutive years of droughts, the high fecundity of wild burros, as well as the overlap with human infrastructure and subsequent frequent interaction between wild burro populations and the public.

Wild burros in general are very resilient and adaptable animals with a metabolism that has evolved to allow them to survive and thrive in poor quality habitat. Wild burros have strong bones and hooves and rarely succumb to ailments that plague domestic horses or burros. Due in part to their hardiness, wild burros typically do not begin to show signs of body condition decline until the habitat components are severely deficient. Once the decline begins, their health deteriorates rapidly. Additionally, wild burros are a long-lived species with documented high survival rates, and they do not have the ability to self-regulate their population size. Predation and disease have not substantially regulated wild burro population levels within or outside the Bullfrog HMA. Throughout the HMAs administered by the Battle Mountain District, there are few predators that exist to control wild burro populations. Some mountain lion predation may occur in select areas, but it is not believed to be substantial or significant enough to balance the 18% growth rate. Coyotes are not prone to prey on wild burros unless very young, or extremely weak. Other predators such as wolf or bear do not exist in this area.

The burro population within the Bullfrog HMA likely doubles, if not triples, during summer months when water availability becomes limited in areas outside the HMA. The additional burros move in from adjacent National Park lands, NTTR lands and BLM lands outside the HMA. When water sources are insufficient in the HMA during the hottest months of the year, wild burros will increase pressure on the town of Beatty, NV. They also encroach on private lands and conservation areas outside of town, causing damage to fencing, ecological restoration projects, and sensitive riparian areas. The increased interaction between humans and burros resulting from this behavior can lead to dangerous situations, namely vehicle collisions, but also entanglement with trash, the ingesting of inappropriate and possibly toxic food sources, and habitation. Due to heavy competition for water and limited water resources, wild burro health is often observed to be impacted during the hotter parts of the year.

EXISTING OBJECTIVES

The Approved Tonopah Resource Management Plan and Record of Decision (1997) established the objectives for management of the Bullfrog HMA. Below is a description of the HMA management objectives or desired condition for the herd and its habitat compared with the existing conditions.

1. The maximum number of wild horses and/or burros to be managed within a herd management area and has been set through monitoring and evaluation or court order... when the AML is exceeded, remove excess wild horses and/or burros to a point which may allow up to three years of population increase before again reaching the AML. (pg. 15)
2. It is the intent of the BLM to manage wild horses and/or burros and their habitat within areas occupied in 1971. Management is to be accomplished in a manner designed to achieve a thriving natural ecological balance and multiple-use relationship with other resource users. The suitability of some areas to support wild horses and/or burros will be reassessed as appropriate in light of new information from monitoring and emergency gathers. (pg. 30)

3. Future herd size will be adjusted as determined through short term and long-term monitoring data methods as outlined in the Nevada Rangeland Monitoring Handbook and BLM Technical References. (pg. 14)
4. Assure sufficient water and forage exist for wild horses and/or burros in herd management areas. (pg. 14)
5. To achieve or maintain the presence of adequate vegetation, landform or large woody debris to dissipate stream energy associated with high water flows for all riparian-wetland areas (pg. 10)
6. To maintain and enhance wildlife habitat and species diversity (pg. 7)
7. To protect, restore, enhance, and expand habitat of species identified as threatened, endangered, or Nevada BLM sensitive species under the Endangered Species Act (pg. 9)

EXISTING AND DESIRED CONDITIONS FOR THE HERD AND ITS HABITAT

The key components for maintaining a healthy wild burro population are forage, water, cover, and space. Cover and space are plentiful for wild burros in the Bullfrog HMA, but forage and water availability are generally limited as the HMA exists in a desert ecosystem.

Forage

Forage is limited enough that historically very little livestock grazing occurred in the HMA even before it was limited to protect the desert tortoise and support Resource Advisory Council (RAC) Land Health Standards. During extended periods of severe drought, particularly when coinciding with high wild burro numbers, the forage can become extremely strained. These conditions have required emergency gathers in the past.

There is no livestock grazing on the Bullfrog HMA. The Montezuma Complex FMUD, signed in 2007, did not allot any AUMs for cattle grazing in order to avoid potential overuse of vegetation and competition with wild equids. Originally, the FMUD allowed two small grazing exceptions within Bullfrog HMA: a small portion of the northern edge of the HMA and another within the northern portion of Razorback and Springdale 2 Allotments. However, those exceptions were never utilized by any livestock grazing permittees due to the low forage production. The BLM updated the Tonopah RMP through plan maintenance in 2008 to remove those exceptions to help support sensitive desert tortoise habitat, as well as pursue adherence to RAC Standards, RMP objectives for rangeland health, and the allotment-specific objectives of the area.

Ecological site inventories and rangeland health assessments conducted in 1991, 1996, 2004, 2005, 2010, 2013 indicate rangelands are in fair condition and that non-native invasive species (such as red brome (*Bromus rubens*) and cheatgrass *(Bromus tectorum*) are increasing. The RAC Standards Review and the Rangeland Health Evaluation for the Razorback Allotment conducted in 2007 indicate that 67% of the allotment did not meet standards for Standard 1-Soils, Standard 2-Ecosystem Components, and Standard 3-Habitat and Biota. The causal factors were determined to be drought and historic grazing by livestock and burros. The standards review and rangeland health evaluation documents and utilization data are available at the Tonopah Field Office.

Forage Utilization

Forage utilization in most years has been measured as slight to light over large parts of the HMA (see tables below), with many areas receiving little to no grazing use. Only in very dry years, or

when the wild burros population has been over AML, have some areas of moderate use or small areas of heavy use been observed.

Utilization data has been collected for the Bullfrog HMA over the last three years. The key forage species monitored include Nevada ephedra (*Ephedra nevadensis)*, winterfat (*Krascheninnikovia lanata*), spiny hopsage (*Grayia spinosa*), four-wing saltbush (*Atriplex* canescens), and white bursage *(Ambrosia dumosa*).

Table 3. Key species utilization percentages of plants surveyed in Key Areas (KA) in 2024.

Key Areas	Negligible 0-5%	Slight 6-20%	Light 21-40%	Moderate 41-60%	Heavy 61-80%	Severe 81-94%	Extreme 95-100%
KA3	15.5%	60.5%	24%	-	-	-	-
KA4	7.74%	64.12%	27.27%	-	-	-	-
KA6	22%	34%	44%	-	-	-	-
KA7	19%	16%	37%	28%	-	-	-
KA8	3%	40%	57%	-	-	-	-
KA9	29.62%	48.14%	22.22%	-	-	-	-

Table 4. Key species utilization percentages of plants surveyed in Key Areas (KA) in 2023.

Key Areas	Negligible 0-5%	Slight 6-20%	Light 21-40%	Moderate 41-60%	Heavy 61-80%	Severe 81-94%	Extreme 95-100%
KA1	1%	2%	7%	22%	20%	36%	12%
KA6	21%	41%	38%	-	-	-	-
KA8	4.5%	23.4%	46.3%	25.7%	-	-	-

Table 5. Key species utilization percentages of plants surveyed in Key Areas (KA) in 2022.

Key Areas	Negligible 0-5%	Slight 6-20%	Light 21-40%	Moderate 41-60%	Heavy 61-80%	Severe 81-94%	Extreme 95-100%
KA1	0.75%	1.25%	15%	20%	63%	-	-
KA6	11.2%	35%	53.8%	-	-	-	-
KA7	43%	57%	-	-	-	-	-

Water

Water availability is another limiting factor for the Bullfrog HMA. The primary source of water for wild burros in the HMA are several springs and seeps. Over time, some of the water reservoirs and pits fill with sediment, reducing their water holding capacity. With reduced capacity, they frequently go dry during the hot summer months of July through September. Increasingly, as wild burro populations grow and water resources diminish, burros seek water sources in urban areas of the town of Beatty. This leads to increased conflict and the danger of collisions with vehicles and other urban hazards. These urban water sources include (but are not limited to) bird baths, decorative pools and fountains, and water from sprinkler systems. Additionally, there are continued issues with members of the public voluntarily watering the burros – a perhaps well-intentioned action with dangerous consequences for wild burros and the public alike.

While wild burros frequently travel long distances between water sources and preferred feeding locations, providing and maintaining multiple reliable water sources greatly improves wild burro distribution, leading to improved health of the herd and the rangelands they depend on. Continuing to monitor, maintain, and improve water sources on the HMA will remain a focus of the management in the future.

Cover & Space

Cover and space are inter-related. Terrain and vegetation are needed to provide escape for wild burros as well as shelter from weather. Sufficient space is needed to allow wild burros to move between resources seasonally. Barriers within the HMA that affect free movement of wild burros include Highway 95 and Highway NV-374, fencing on private and public lands, and the infrastructure of the town of Beatty, NV.

OTHER RESOURCES

SPRINGS, SEEPS, AND RIPARIAN AREAS

Riparian areas play a significant role in restoring and maintaining the chemical, physical, and biological integrity of an area's supply of water. Water is a significant limiting factor in the Bullfrog HMA, there are only a few sites with accessible water and the distance between said sites is substantial. This results in heavy pressure on the riparian vegetation, a relationship that increases as wild burro populations rise above sustainable levels. Concentrated use of springs degrades them over time and threatens plant and wildlife communities as well as the productivity and longevity of the springs themselves.

The majority of the springs and riparian areas on the Bullfrog HMA are found throughout the mountainous areas and near the Amargosa River. They usually consist of small patches of wet soil at seeps and springs, which are dominated by riparian grasses, sedges and rushes.

The Amargosa River channel runs through the HMA but majority of it is fenced private land. Moreover, most of the river is seasonal in nature and does not provide wild burros with a dependable source of water. Other sources of available water in the HMA are springs and seeps. Due to the limited number of springs and an overpopulation of wild burros, competition with wildlife species is an increasing concern, chiefly with the Amargosa toad (*Anaxyrus nelsoni*), Oasis Valley speckled dace (*Rhinichthys osculus ssp. 6*), and desert bighorn sheep *(Ovis canadensis nelsoni*). Many of the riparian areas throughout the HMA, near springs and the

Amargosa River, provide habitat for the BLM sensitive status species, Amargosa toad and Oasis Valley speckled dace. Therefore, it is imperative that these riparian resources not be over-utilized or degraded by wild burros. Managing wild burros at AML is critical to protect sensitive habitat and valuable riparian resources and springs.

MINING

Sterling Silver Mine: 5,473 acres

The Sterling Silver Mine (AngloGold Ashanti North America Inc.) is under the jurisdiction of the Southern Nevada District Office but is physically located a few hundred feet from the unfenced southern boundaries of the Bullfrog HMA and the Battle Mountain District Office. Wild burros routinely cross over to utilize the area. There are 4 water developments (i.e. "guzzlers") installed by the Nevada Department of Wildlife (NDOW) to support desert bighorn sheep populations in the Bare Mountain range but these resources are encroached upon by burros regularly.

North Bullfrog Mine: 5,396 acres

The North Bullfrog Mine by Corvus Gold Nevada, Inc. (AngloGold Ashanti North America Inc.) is a proposed mine development. The Bullfrog Mining District has a long history of silver and gold mining, with the precious minerals having first been discovered there in 1904. The Bullfrog Mine would be an open pit precious metal mining operation with three primary open pits. The mine development life cycle schedule includes approximately one year of pre-mining and construction, followed by 12 years of active open pit mining, followed by 2-3 years of active gold recovery on the Heap leach pad and mine reclamation activities, followed by 3-4 years of heap rinsing, reclamation and closure activities, for a total of 20 years.

This mine has not broke ground yet, and subsequently has not reported any issues with wild burros, but it is located entirely within the HMA. The effects of water and land use by the North Bullfrog Mine is expected to have some effect on groundwater levels. Drawdown on groundwater could extend to a predicted maximum of 10ft approximately 6 miles west and north of the mine, and 4 miles east of the mine. The impacts of this mine on springs, seeps, and water availability for wild burros on the HMA is predicted to be minimal at this time.

MANAGEMENT ISSUES

PUBLIC SAFETY AND NUISANCE CONCERNS

Collisions and near-collisions involving motor vehicles and wild burros are not uncommon on Highway 95 in the Beatty area. Highway 95 is the most important connection between the major cities of Las Vegas and Reno, and Beatty serves as a busy tourism gateway to Death Valley National Park. This corridor is used by all types of vehicles, from motorcycles to passenger vehicles to tractor trailer trucks. In 2016 and 2017, after 43 burros were removed in September 2015, Nevada Department of Transportation documented 36 incidents involving wild burros on Highway 95 within the Bullfrog HMA and within a few miles of the northern and southern boundaries (mileposts 49.5 through 77 in Nye County). Traffic accidents increase as burros are drawn into roadways seeking food and water.

Figure 2. Wild burro seeking inappropriate food source from tourists.

Figure 3. Wild burro looking in trash can within Beatty, NV.

Beatty residents report wild burros as causing disruption and financial burden by damage or destruction to landscaping, leaving manure on private property, and disturbing and harassing domestic animals. The labor hours and taxpayer money expended on moving burros off highways is costly. These escalating issues have led to formal gather requests being submitted by

the Beatty Town Advisory Board in 2023 to the BLM. Private landowners and local companies have also requested the BLM to address the overpopulation issue.

Intentional feeding and watering of the burros by the public is a persistent issue that encourages the wild burros to seek resources in town, placing both humans and burros in dangerous situations. Vehicles pulled aside to offer human food to wild burros are increasingly observed in areas with high interface between wild burros and the traffic of Highway 95. Increasing education and outreach efforts with the public in Beatty, NV, and the surrounding area is an important objective of the Tonopah Field Office for future management.

MINING CONCERNS

The Sterling Mine

The mine experiences wild burros damaging fences, pipes, and valves while seeking water sources. These activities increase in the hotter months of the year and as overpopulation leads to further dispersal from the HMA. The presence of the burros can discourage use by bighorn sheep and can consequently impact their health during times of extreme drought or heat. The mine also has expressed concern over conflicts between burros and vehicles due to burros utilizing the roads used by employees to enter and exit the mine.

The mine has reached out to Tonopah Field Office on a number of occasions soliciting assistance with wild burro safety, nuisance, and orphan foal issues. In 2023, the mine made a request to TFO to reduce wild burro numbers via removal from the range as the damage to their water guzzlers and hazards to their employees has become unsustainable.

Figure 4. Wild burro and desert bighorn sheep at Sterling Mine guzzler in 2019.

The North Bullfrog Mine

Measures will need to be taken by the mine to fence out wild burro access to mining operations. It is also possible that the footprint of the mine may displace wild burros, increasing use of the remaining resources in the HMA, particularly with the current extreme levels of overpopulation.

WILDLIFE CONCERNS

There are wildlife concerns when wild burro populations are above AML and there is heavy concentration at water sources. This situation causes riparian resources to be impacted and poses a risk to native and endemic Nevada wildlife. Four wildlife species of special concern live within the HMA: the Mojave Desert tortoise (*Gopherus agassizii*) (USFWS threatened), the Amargosa toad (*Anaxyrus nelsoni*) (BLM sensitive), Oasis Valley speckled dace (*Rhinichthys osculus ssp. 6*) (BLM sensitive), and the desert bighorn sheep (*Ovis canadensis nelsoni*) (BLM sensitive). Approximately 58.5% of the Bullfrog HMA has been mapped as desert tortoise habitat. In addition to the federal Endangered Species Act, in Nevada, the Mojave Desert tortoise is protected under Nevada Revised Statute (NRS 501.100), and Nevada Administrative Code (NAC 503.080). Desert tortoises depend on the spring green-up period and forbs produced therein to attain adequate health and body condition to survive harsher conditions the rest of the year, thus over-utilization by grazers can threaten tortoise survival. Because of the importance of the area as tortoise habitat as well as the effects of wild burro grazing, there is no cattle grazing authorized within Bullfrog HMA.

FUTURE MANAGEMENT

The TFO is preparing a Bullfrog Herd Management Area Plan (HMAP) to guide management of the wild burros and their habitat into the future. The HMAP update will address the following management objectives:

- Sustain healthy populations of wild burros within the Herd Management Area AML range.
- Assure healthy range and riparian conditions.
- Utilize all population growth suppression methods.
- Disperse wild burro use.
- Minimize conflict with humans in the town of Beatty, NV.
- Public education and outreach.
- Minimize collisions on highways and roads.
- Maintain desert tortoise habitat.
- Other issues as identified.