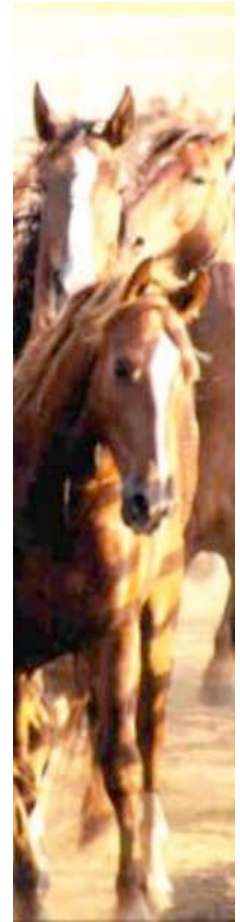
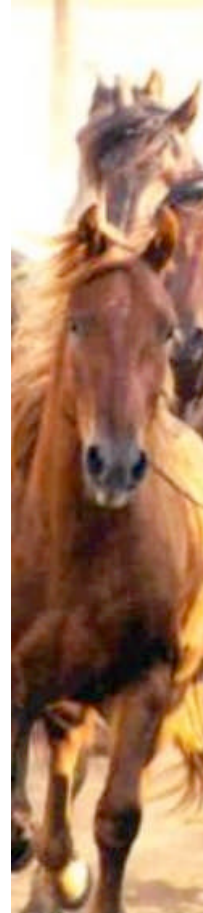
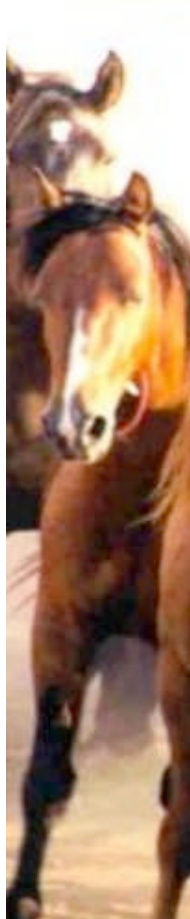


America's Mustangs & Burros

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

SUMMARY REPORT
*Method Overview &
Alternative Populations*



What's Left?
National Wild Horse & Burro Populations
REVISED 2009

I. Overview

Historical Population Reports

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

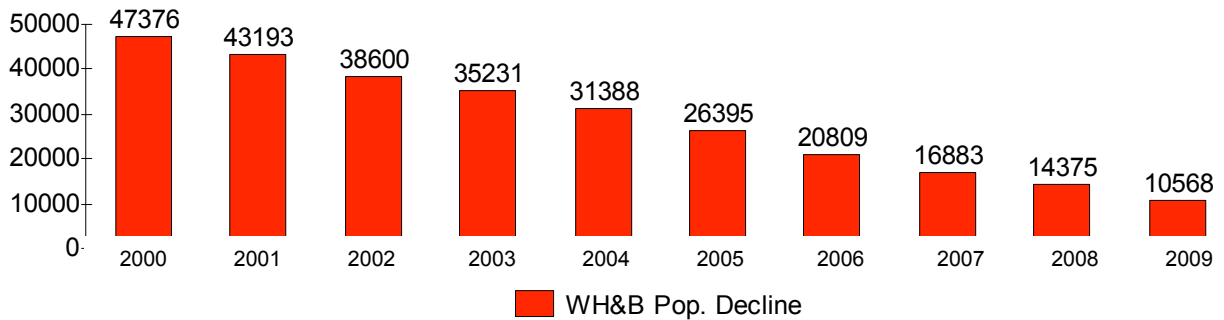
Noted discrepancies were also found in BLMs FY1999 wild horse and burro removals numbers as well as in FY2000 reported total populations in the originally published documents versus the 2007 Herd Statistics.

While the method used to determine how these projected populations has been described in detail in the following pages, a quick overview of its results based on the analysis of BLMs own wild horse and burro removal reports for Fiscal Years 2000 through 2009 and applying a 20% reproduction rate to each years pre-foal populations revealed the most likely wild horse and burro population still remaining on the range were as follows:

Table 1. Removal Ratios/National Wild Horse and Burro Populations-September 2009

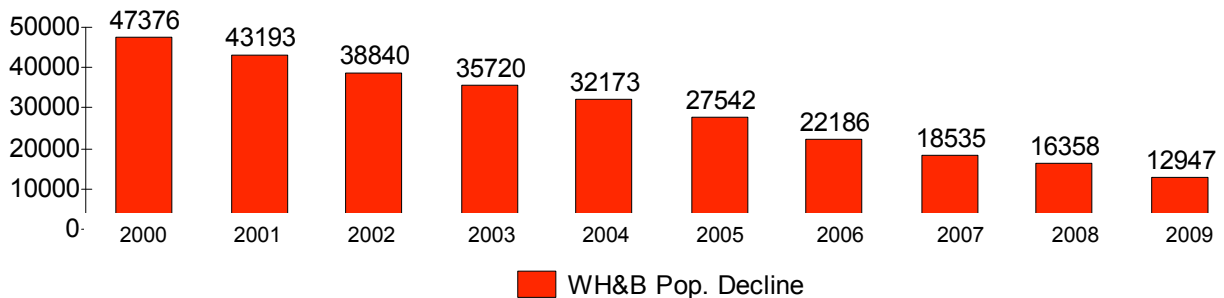
National WH&B Populations: 50/50% Ratio

FY2000 Thru FY2009



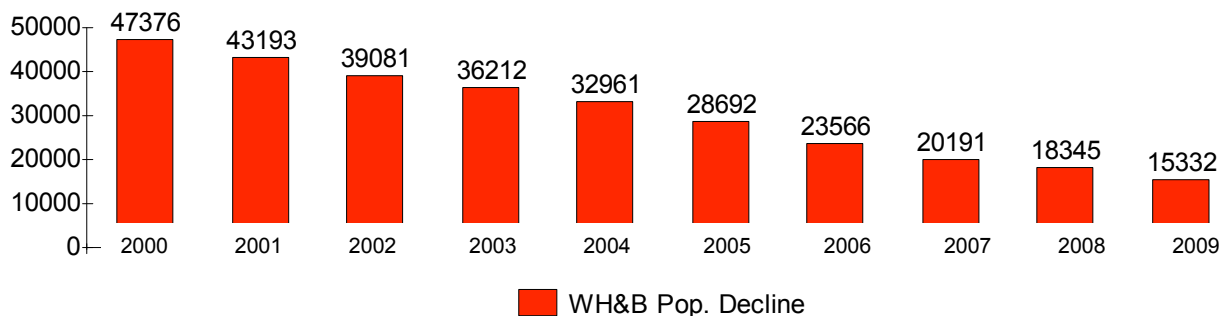
National WH&B Populations: 40/60% Ratio

FY2000 Thru FY2009



National WH&B Populations: 30/70% Ratio

FY2000 Thru FY2009



II. Population Analysis and Methodology

BLM Reporting Methods

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

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

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

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

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

Beginning Analysis

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

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

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

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

Reproduction Rates

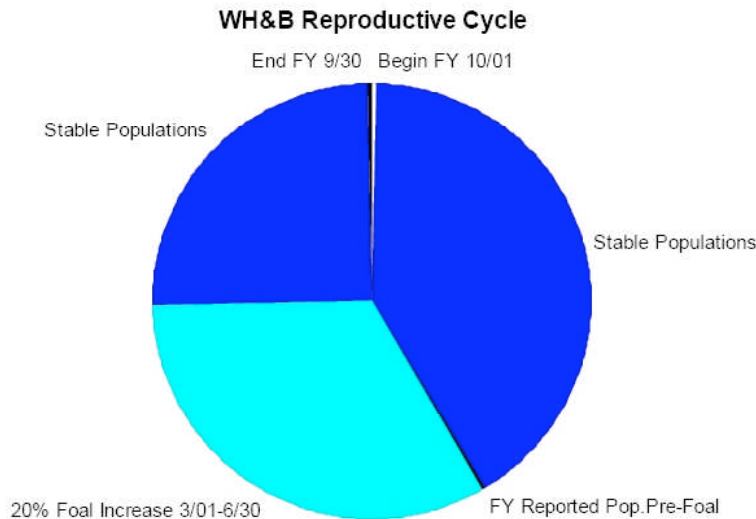
The issue of accurate reproduction rates in wild equid populations is just as contentious as most issues about wild horses and burros. While the debate continues as to true wild equid reproduction rates, BLM uses a 20% standard for both wild horses and burros. While it may or may not accurately reflect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

Statistical Cycles

BLM uses two cycles in reporting and determining wild horse and burro populations. The first cycle is based on the reproductive cycles of the wild horses. Essentially, wild horse populations remain relatively stable through out the course of the year, except during March 1 through June 30, which is considered the “peak foaling season” were the bulk of wild horses foal.

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

Table 5. Wild Horse Reproductive Cycle



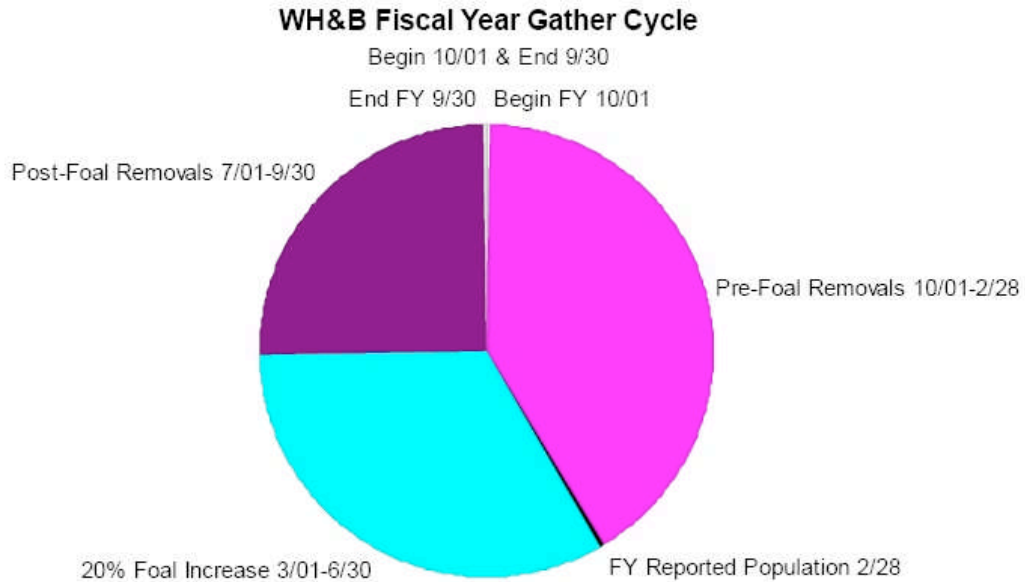
The second cycle is based on fiscal year cycles, which is necessary due to funding issues and government required reports, data and statistics. In order to make these two cycles connect for accurate population estimates, they were divided into the following categories, which begin on October 1st at the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

The Fiscal Year categories are as follows:

1. Pre-Foaling Population (Winter Gathers): This category reflects activities that occur from the start of the fiscal year on October 1st through February 28th, when BLM calculates and reports annual national population estimates. This category is necessary so that removals conducted prior to foaling season can be appropriately accounted for and prevents inflated reproduction rates being applied to wild horses and burros that are not actually contributing to reproductive cycles or population increases on the range because of their removals.
2. Foaling Increases (Foaling Season): This category reflects the foaling season where no gathers occur between March 1 and June 30 of each year. The exception to this is wild burros are reported by BLM as foaling year-round, therefore BLM often conducts removals of wild burros during the normal foaling season for wild horses. Any removals of wild burros during this time frame are applied to the second half of the fiscal years removal statistics. BLMs standard of projecting a 20% population increase has been utilized in every analysis.
3. Post-Foaling Populations: This category reflects a 20% increase to the total populations reported on February 28th of each year and is considered completed as of July 1st.
4. Post-Foaling Removals (Summer Gathers): This category reflects removals as a result of gather operations conducted between July 1st and September 30th of each fiscal year.
5. End of Fiscal Year Populations (September 30th): This category reflects impacts of removals to total populations due to removals that occur between July 1st and September 30th. A population estimate is necessary at this juncture due to BLM being required to begin a new fiscal year gather cycle and schedule with a new set of removal numbers that begin again on October 1st. In addition to the snapshot of populations reported on February 28th, it is necessary to also take this “snapshot” to determine the results of the removals that occurred over the course of the fiscal year so that the new fiscal year numbers may then be applied beginning again on October 1st.

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

Table 6. Wild Horse & Burro Fiscal Year Gather Cycle



Methodology

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

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

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

All fiscal year removal numbers were taken from BLMs 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table except the fiscal years 2006-2009 when BLM National Gather Schedules were available. These were used instead of the nationally reported statistics because actual removals reported by BLM between the pre-foal winter removals and the post-foal summer cycles could be accurately applied.

Therefore, the following exceptions should be noted:

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

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

c) The 2008/2009 removals were extracted from BLMs 2008/2009 National Gather Schedules Final Report. No distinction between USFS and BLM wild horses and burros were noted.

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

**Table 7. BLM Wild Horse & Burro Populations
National Removals 2001-2009**

Fiscal Year	Total WH&B Removals	USFS Removals	Actual BLM Managed Removals
2001	13,227	N/A	13,227
2002	12,029	N/A	12,029
2003	10,081	N/A	10,081
2004	9,899	N/A	9,899
2005	11,023	777	10,246
2006	10,323	222	10,101
2007	7,365	N/A	7,365
2008*	5,213	N/A	5,213
2009*	6,036	N/A	6,036

*Removals reported via BLM's 2008/2009 National Gather Schedules

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

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

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

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

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

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

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

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

The obvious effects of applying these different ratios towards the pre-foaling population are different rates of population increases.

However, it must be noted that while ratio removals were analyzed as percentage projections of 50/50%, 40/60% and 30/70% in the years 2002 through 2005, the exact numbers of winter and summer removals were applied in 2001 (as provided by BLMs reported removals, which resulted in the starting base population) as well as exact removals were applied in the years 2006-2009 as reported by BLM Gather Schedules.

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

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

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

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

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

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

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

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

Once the starting population base was determined, no other effort was made to “match” reported populations in this analysis with BLMs reported populations each February 28th of the fiscal years analyzed. However, exact winter/summer removals numbers were incorporated as reported by BLMs 2006, 2007, 2008 and 2009 Gather Schedules.

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

Additional Considerations

Upon review of a variety of BLM reports, noted discrepancies were found in fiscal year population and removal statistics. An in-depth analysis of some of these discrepancies has been included for additional consideration.

BLM Reported Removal History 1992-2007

The following table is comprised of population and removal numbers reported by BLM published in the 2007 Wild Horse and Burro Removal, Adoption, Population, AML Table.

Table 2. BLM Reported Wild Horse & Burros Populations & Removals: 1992-2009

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

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

Table 3. BLM and U.S. Forest Service Removals 2005-2009

Fiscal Year	Total Removals	USFS Removals	Actual Removals from BLM Managed Populations
2005	11,023	777	10,246
2006	10,399 ⁽¹⁾	245	10,154
2007	7,726	737 ⁽²⁾	6,989
2008	5,213	N/A	5,213 ⁽³⁾
2009	6,036	N/A	6,036 ⁽⁴⁾

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

(2) Significant discrepancies were noted in USFS removals in the 2007 Gather Schedules.

(3) BLMs reported 5,275 wild horses and burros were removed in their FY08 Removals & Adoption History Report while their FY2008 National Gather Schedule only reported removing 5,213 animals. Due to the fact that the Gather Schedules provide specific breakdowns of pre-foal and post-foal removals, the National Gather Schedule Statistics have been used.

(4) At this time, BLM has yet to post a FY09 Removals & Adoption History Report so FY09 National Gather Statistics have been used.

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

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

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

This document is also available at:

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

2006 Removals & Discrepancies

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

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

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

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

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

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

Table 4. 2006 State Wild Horse Removals and Discrepancies

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

2007 Removals and Discrepancies

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

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

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

2008/2009 Removals and Discrepancies

With respect to Fiscal Year 2008 reports, a noted difference was found between BLMs FY08 Removals and Adoptions Report, which reported 5,275 wild horses and burros were removed versus the Final FY2008 National Gather Schedule report of 5,213 wild horses and burros being removed.

With respect to BLMs FY09 Removals and Adoptions Report, as of November 7, 2009, BLM is now reporting a change in its former policy of publishing these reports approximately at the end of each fiscal year. BLM has posted via website that this report will now be available six months later than normal, currently projected for public release in May 2010. Therefore, due to BLMs withholding of this information, no analysis is possible.

III. INDEPENDENT ANALYSIS

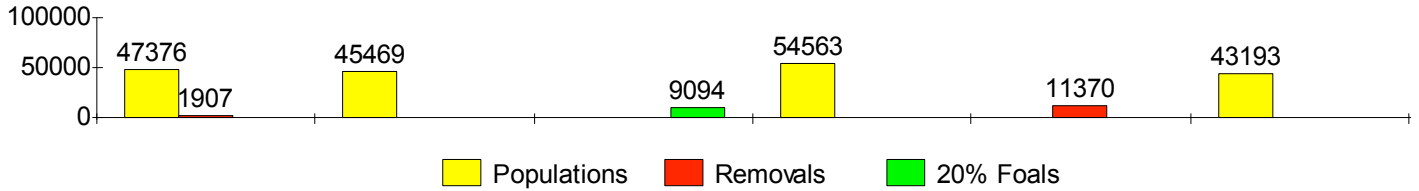
Though three different removal ratios were analyzed, due to a wide variety of factors including a high potential for inflated populations during much of the 1990's, the minimal removals reported between September 30th, 2000 and February 28th, 2001, which in turn may have caused excessively high reproduction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

However, in the following section individual breakdowns of each fiscal years removals and reproduction cycles and the various ratios applied have been provided for in-depth review of each potential remaining population as of September 30th, 2009.

**Annual Wild Horse & Burro Reproduction/Removal Cycles
50/50% Removal Ratios: Fiscal Year 2001-2009**

National WH&B Populations

FY2001 - 50/50% Removals



Fiscal Year 2001

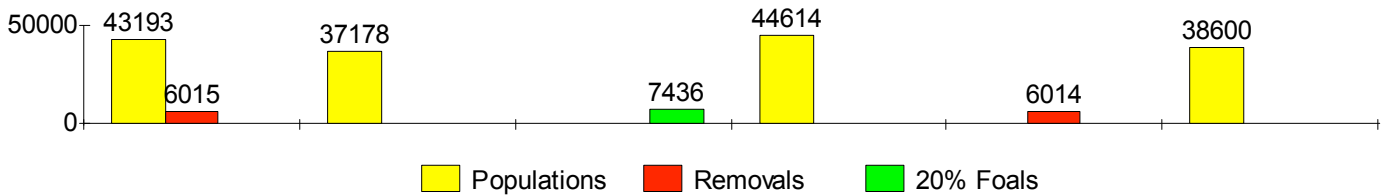
10/01/00 thru 9/30/01

FY01 Reported Total Removals: 13,277 WH&Bs

Reported FY00 Population as of 9/30/00:	47,376
Removals between 10/01/00 and 2/28/01:	-1,907
BLM Reported Population as of 2/28/01:	45,469
Foaling Rate (20%) between 3/01/01 and 6/30/01:	+ 9,094
Post-Foal Populations as of 6/30/01:	54,563
Removals Between 7/01/01 and 9/30/01:	<u>-11,370</u>
Alternate Remaining Population as of 9/30/01	43,193

National WH&B Populations

FY2002 - 50/50% Removals



Fiscal Year 2002

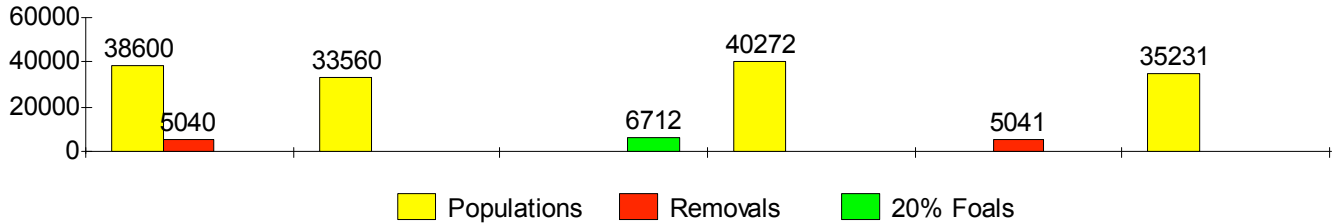
10/01/01 thru 9/30/02

FY02 Reported Total Removals: 12,029 WH&Bs

FY01 End Alternate Population as of 9/30/01:	43,193
50% Removals between 10/01/01 and 2/28/02:	-6,015
FY02 Alternate Population as of 2/28/02:	37,178
Foaling Rate (20%) between 3/01/02 and 6/30/02:	+ 7,436
Post-Foal Populations as of 6/30/02:	44,614
50% Removals Between 7/01/02 and 9/30/02:	<u>-6,014</u>
Alternate Remaining Population as of 9/30/02	38,600

National WH&B Populations

FY2003 - 50/50% Removals



Fiscal Year 2003

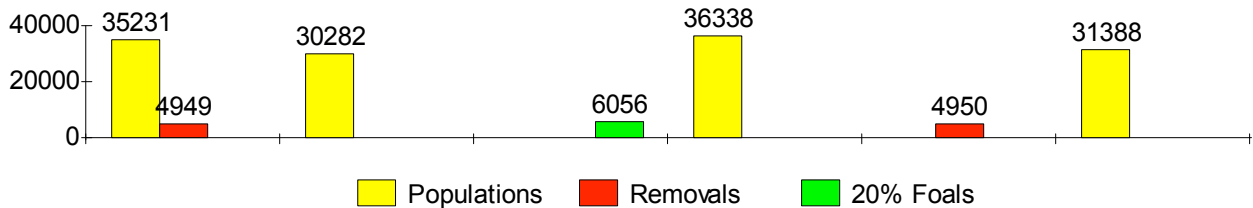
10/01/02 thru 9/30/03

FY03 Reported Total Removals: 10,081 WH&Bs

FY02 End Alternative Population as of 9/30/02:	38,600
50% Removals between 10/01/02 and 2/28/03:	-5,040
FY03 Alternative Populations as of 2/28/03:	33,560
Foaling Rate (20%) between 3/01/03 and 6/30/03:	+ 6,712
Post-Foal Populations as of 6/30/03:	40,272
<u>50% Removals Between 7/01/03 and 9/30/03:</u>	<u>-5,041</u>
Alternative Remaining Population as of 9/30/03	35,231

National WH&B Populations

FY2004 - 50/50% Ratio



Fiscal Year 2004

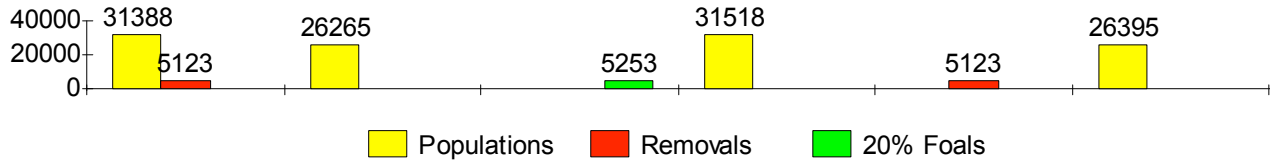
10/01/03 thru 9/30/04

FY04 Reported Total Removals: 9,899 WH&Bs

FY03 End Alternative Population as of 9/30/03:	35,231
50% Removals between 10/01/03 and 2/28/04:	-4,949
FY04 Alternative Population as of 2/28/04:	30,282
Foaling Rate (20%) between 3/01/04 and 6/30/04:	+ 6,056
Post-Foal Populations as of 6/30/04:	36,338
<u>50% Removals Between 7/01/04 and 9/30/04:</u>	<u>-4,950</u>
Alternative Remaining Population as of 9/30/04	31,388

National WH&B Populations

FY2005 - 50/50% Removals



Fiscal Year 2005

10/01/04 thru 9/30/05

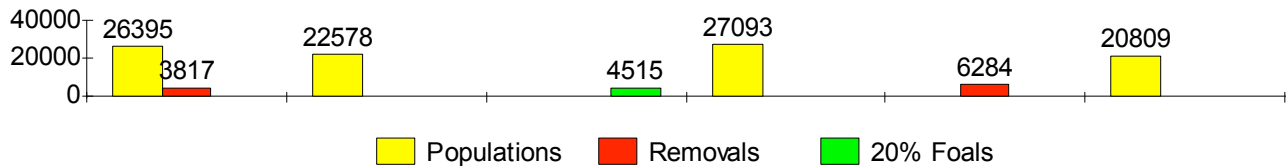
FY05 Reported Total Removals: 10,246 WH&Bs*

*USFS removals deducted

FY04 End Alternative Population as of 9/30/04:	31,388
50% Removals between 10/01/04 and 2/28/05:	-5,123
FY05 Alternative Population as of 2/28/05:	26,265
Foaling Rate (20%) between 3/01/05 and 6/30/05:	+ 5,253
Post-Foal Populations as of 6/30/05:	31,518
<u>50% Removals Between 7/01/05 and 9/30/05:</u>	<u>-5,123</u>
Alternative Remaining Population as of 9/30/05	26,395

National WH&B Populations

FY2006 - NGS Removals



Fiscal Year 2006

10/01/05 thru 9/30/06

FY06 Reported Total Removals: 10,101 WH&Bs*

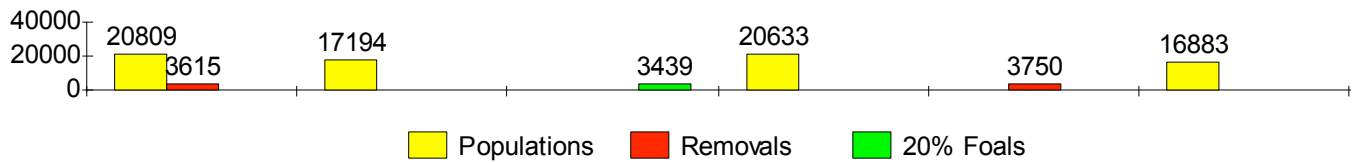
*Via BLM 2006 National Gather Schedule (NGS) - USFS removals deducted

FY05 End Alternative Population as of 9/30/05:	26,395
FY06 NGS Removals between 10/01/05 and 2/28/06:	-3,817
FY06 Alternative Population as of 2/28/06:	22,578
Foaling Rate (20%) between 3/01/06 and 6/30/06:	+ 4,515
Post-Foal Populations as of 6/30/06:	27,093
<u>FY06 NGS Removals Between 7/01/06 and 9/30/06:</u>	<u>-6,284</u>
Alternative Remaining Population as of 9/30/06	20,809

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

National WH&B Populations

FY2007 - NGS Removals



Fiscal Year 2007

10/01/06 thru 9/30/07

FY07 Reported Total Removals: 7,365 WH&Bs*

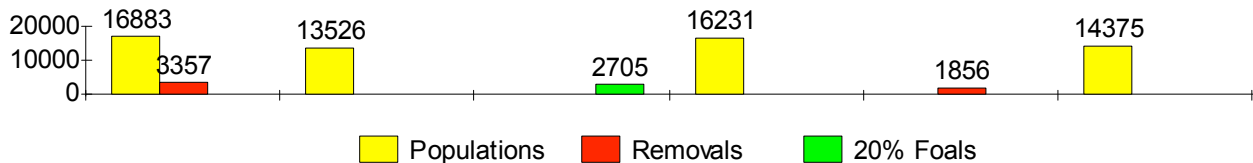
*Via BLM 2007 National Gather Schedule (NGS)

FY06 End Alternative Population as of 9/30/06:	20,809
FY07 NGS Removals between 10/01/06 and 2/28/07:	-3,615
FY07 Alternative Population as of 2/28/07:	17,194
Foaling Rate (20%) between 3/01/07 and 6/30/07:	+ 3,439
Post-Foal Populations as of 6/30/07:	20,633
<u>FY07 NGS Removals Between 7/01/07 and 9/30/07:</u>	<u>-3,750</u>
Alternative Remaining Population as of 9/30/07	16,883

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

National WH&B Populations

FY2008 - NGS Removals



Fiscal Year 2008

10/01/07 thru 9/30/08

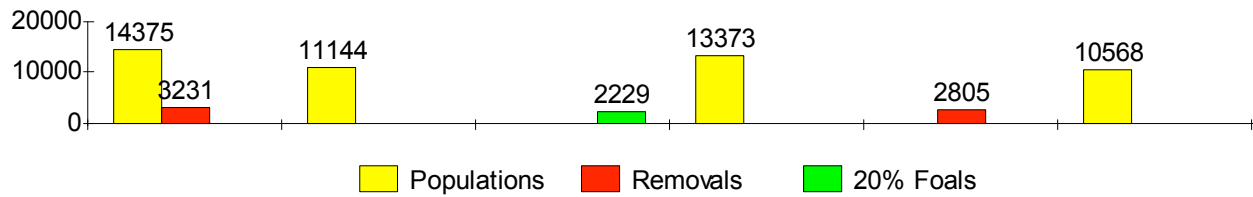
FY08 Reported Total Removals: 5,213 WH&Bs*

*Via BLM 2008 National Gather Schedule (NGS)

FY07 End Alternative Population as of 9/30/07:	16,883
FY08 NGS Removals between 10/01/07 and 2/28/08:	-3,357
FY08 Alternative Population as of 2/28/08:	13,526
Foaling Rate (20%) between 3/01/08 and 6/30/08:	+ 2,750
Post-Foal Populations as of 6/30/08:	16,231
<u>FY08 NGS Removals Between 7/01/08 and 9/30/08:</u>	<u>-1,856</u>
Alternative Remaining Population as of 9/30/08	14,375

National WH&B Populations

FY2009 - NGS Removals



Fiscal Year 2009

10/01/08 thru 9/30/09

FY09 Reported Total Removals: 6,036 WH&Bs*

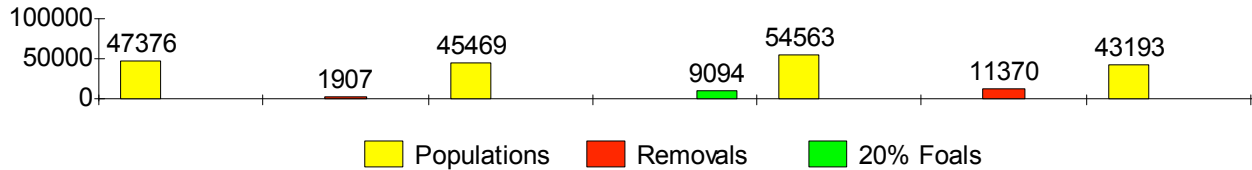
*Via BLM 2009 National Gather Schedule (NGS)

FY08 End Alternative Population as of 9/30/08:	14,375
FY09 NGS Removals between 10/01/08 and 2/28/09:	-3,231
FY09 Alternative Population as of 2/28/09:	11,144
Foaling Rate (20%) between 3/01/09 and 6/30/09:	+ 2,229
Post-Foal Populations as of 6/30/09:	13,373
<u>FY09 NGS Removals Between 7/01/09 and 9/30/09:</u>	<u>-2,805</u>
Alternative Remaining Population as of 9/30/09	10,568

Annual Wild Horse & Burro Reproduction/Removal Cycles 40/60% Removal Ratios: Fiscal Year 2001-2009

WH&B Populations

FY2001 - 40/60% Removals



Fiscal Year 2001

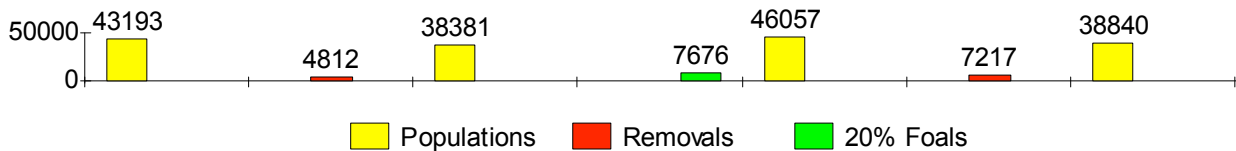
10/01/00 thru 9/30/01

FY01 Reported Total Removals: 13,277 WH&Bs

Reported FY00 Population as of 9/30/00:	47,376
Removals between 10/01/00 and 2/28/01:	-1,907
BLM Reported Population as of 2/28/01:	45,469
Foaling Rate (20%) between 3/01/01 and 6/30/01:	+ 9,094
Post-Foal Populations as of 6/30/01:	54,563
Removals Between 7/01/01 and 9/30/01:	-11,370
Alternate Remaining Population as of 9/30/01	43,193

WH&B Populations

FY2002 - 40/60% Removals



Fiscal Year 2002

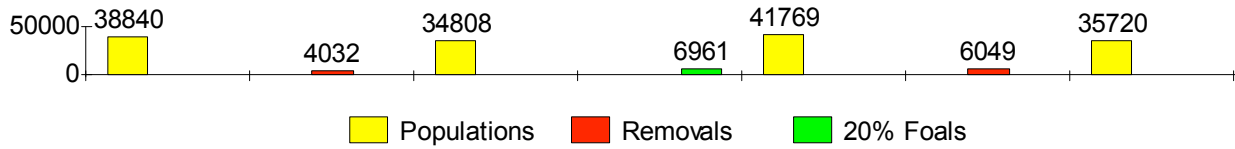
10/01/01 thru 9/30/02

FY02 Reported Total Removals: 12,029 WH&Bs

FY01 End Alternate Population as of 9/30/01:	43,193
40% Removals between 10/01/01 and 2/28/02:	-4,812
FY02 Alternate Population as of 2/28/02:	38,381
Foaling Rate (20%) between 3/01/02 and 6/30/02:	+ 7,676
Post-Foal Populations as of 6/30/02:	46,057
60% Removals Between 7/01/02 and 9/30/02:	-7,217
Alternate Remaining Population as of 9/30/02	38,840

WH&B Populations

FY2003 - 40/60% Removals



Fiscal Year 2003

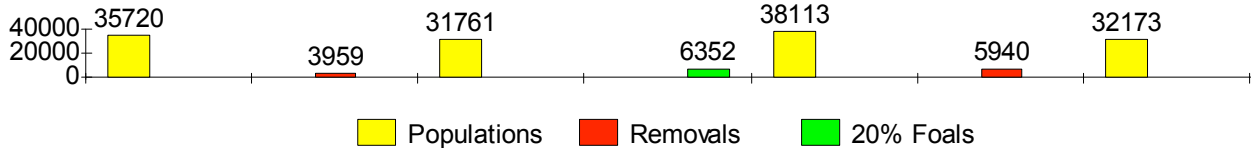
10/01/02 thru 9/30/03

FY03 Reported Total Removals: 10,081 WH&Bs

FY02 End Alternative Population as of 9/30/02:	38,840
40% Removals between 10/01/02 and 2/28/03:	-4,032
FY03 Alternative Populations as of 2/28/03:	34,808
Foaling Rate (20%) between 3/01/03 and 6/30/03:	+ 6,961
Post-Foal Populations as of 6/30/03:	41,769
60% Removals Between 7/01/03 and 9/30/03:	-6,049
Alternative Remaining Population as of 9/30/03	35,720

WH&B Populations

FY2004 - 40/60% Removals



Fiscal Year 2004

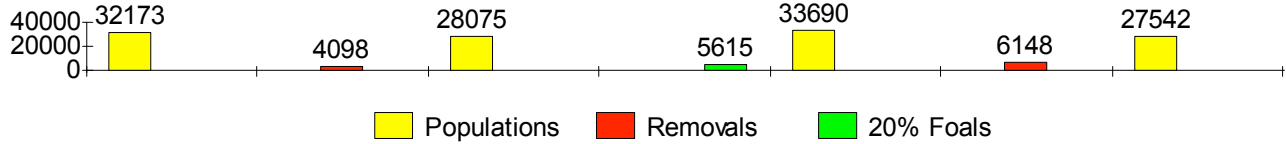
10/01/03 thru 9/30/04

FY04 Reported Total Removals: 9,899 WH&Bs

FY03 End Alternative Population as of 9/30/03:	35,720
40% Removals between 10/01/03 and 2/28/04:	-3,959
FY04 Alternative Population as of 2/28/04:	31,761
Foaling Rate (20%) between 3/01/04 and 6/30/04:	+ 6,352
Post-Foal Populations as of 6/30/04:	38,113
60% Removals Between 7/01/04 and 9/30/04:	-5,940
Alternative Remaining Population as of 9/30/04	32,173

WH&B Populations

FY2005 - 40/60% Removals



Fiscal Year 2005

10/01/04 thru 9/30/05

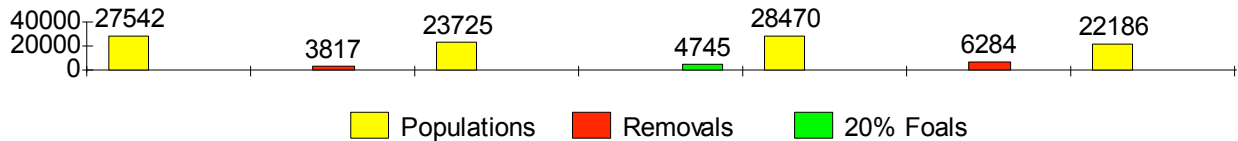
FY05 Reported Total Removals: 10,246 WH&Bs*

*USFS removals deducted

FY04 End Alternative Population as of 9/30/04:	32,173
40% Removals between 10/01/04 and 2/28/05:	-4,098
FY05 Alternative Population as of 2/28/05:	28,075
Foaling Rate (20%) between 3/01/05 and 6/30/05:	+ 5,615
Post-Foal Populations as of 6/30/05:	33,690
60% Removals Between 7/01/05 and 9/30/05:	-6,148
Alternative Remaining Population as of 9/30/05	27,542

WH&B Populations

FY2006 - NGS Removals



Fiscal Year 2006

10/01/05 thru 9/30/06

FY06 Reported Total Removals: 10,101 WH&Bs*

*Via BLM 2006 National Gather Schedule (NGS) - USFS removals deducted

FY05 End Alternative Population as of 9/30/05:	27,542
FY06 NGS Removals between 10/01/05 and 2/28/06:	-3,817
FY06 Alternative Population as of 2/28/06:	23,725
Foaling Rate (20%) between 3/01/06 and 6/30/06:	+ 4,745
Post-Foal Populations as of 6/30/06:	28,470
FY06 NGS Removals Between 7/01/06 and 9/30/06:	-6,284
Alternative Remaining Population as of 9/30/06	22,186

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

WH&B Populations

FY2007 - NGS Removals



Fiscal Year 2007

10/01/06 thru 9/30/07

FY07 Reported Total Removals: 7,365 WH&Bs*

*Via BLM 2007 National Gather Schedule (NGS)

FY06 End Alternative Population as of 9/30/06:	22,186
FY07 NGS Removals between 10/01/06 and 2/28/07:	-3,615
FY07 Alternative Population as of 2/28/07:	18,571
Foaling Rate (20%) between 3/01/07 and 6/30/07:	+ 3,714
Post-Foal Populations as of 6/30/07:	22,285
<u>FY07 NGS Removals Between 7/01/07 and 9/30/07:</u>	<u>-3,750</u>
Alternative Remaining Population as of 9/30/07	18,535

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

WH&B Populations

FY2008- NGS Removals



Fiscal Year 2008

10/01/07 thru 9/30/08

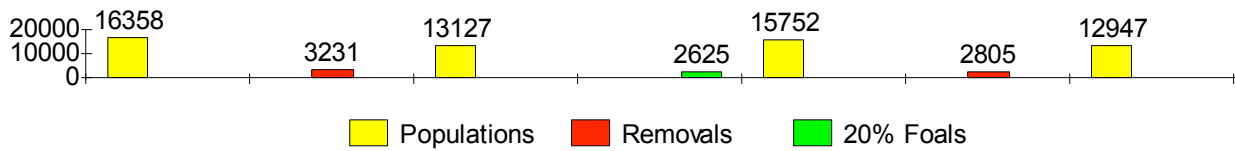
FY08 Reported Total Removals: 5,213 WH&Bs*

*Via BLM 2008 National Gather Schedule (NGS)

FY07 End Alternative Population as of 9/30/07:	18,535
FY08 NGS Removals between 10/01/07 and 2/28/08:	-3,357
FY08 Alternative Population as of 2/28/08:	15,178
Foaling Rate (20%) between 3/01/08 and 6/30/08:	+ 3,036
Post-Foal Populations as of 6/30/08:	18,214
<u>FY08 NGS Removals Between 7/01/08 and 9/30/08:</u>	<u>-1,856</u>
Alternative Remaining Population as of 9/30/08	16,358

WH&B Populations

FY2009- NGS Removals



Fiscal Year 2009

10/01/08 thru 9/30/09

FY09 Reported Total Removals: 6,036 WH&Bs*

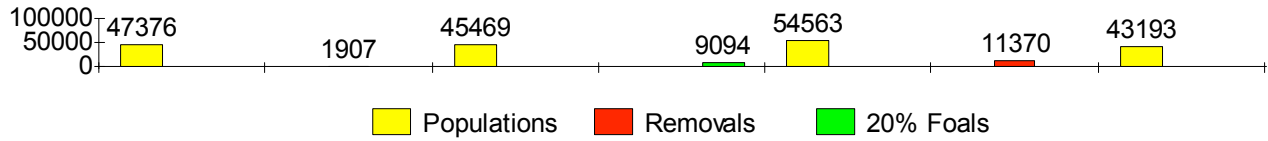
*Via BLM 2009 National Gather Schedule (NGS)

FY08 End Alternative Population as of 9/30/08:	16,358
FY08 NGS Removals between 10/01/08 and 2/28/09:	-3,231
FY08 Alternative Population as of 2/28/09:	13,127
Foaling Rate (20%) between 3/01/09 and 6/30/09:	+ 2,625
Post-Foal Populations as of 6/30/09:	15,752
<u>FY09 NGS Removals Between 7/01/09 and 9/30/09:</u>	<u>-2,805</u>
Alternative Remaining Population as of 9/30/09	12,947

Annual Wild Horse & Burro Reproduction/Removal Cycles 30/70% Removal Ratios: Fiscal Year 2001-2009

WH&B Populations

FY2001 - 30/70% Removals



Fiscal Year 2001

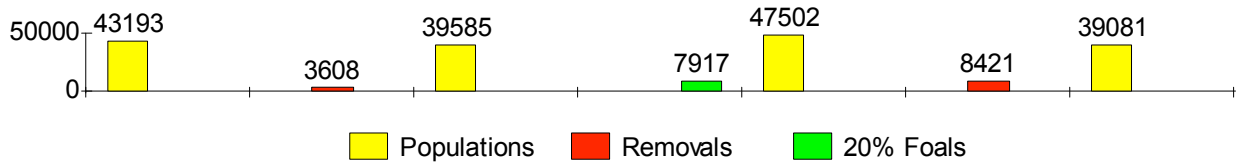
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Post-Foal Populations as of 6/30/01:	54,563
<u>Removals Between 7/01/01 and 9/30/01:</u>	<u>-11,370</u>
Alternate Remaining Population as of 9/30/01	43,193

WH&B Populations

FY2002 - 30/70% Removals



Fiscal Year 2002

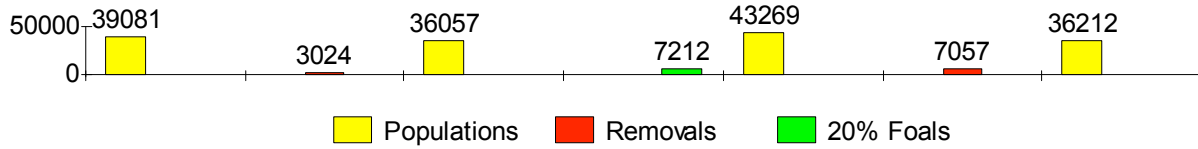
10/01/01 thru 9/30/02

FY02 Reported Total Removals: 12,029 WH&Bs

FY01 End Alternate Population as of 9/30/01:	43,193
30% Removals between 10/01/01 and 2/28/02:	-3,608
FY02 Alternate Population as of 2/28/02:	39,585
Foaling Rate (20%) between 3/01/02 and 6/30/02:	+ 7,917
Post-Foal Populations as of 6/30/02:	47,502
<u>70% Removals Between 7/01/02 and 9/30/02:</u>	<u>-8,421</u>
Alternate Remaining Population as of 9/30/02	39,081

WH&B Populations

FY2003 - 30/70% Removals



Fiscal Year 2003

10/01/02 thru 9/30/03

FY03 Reported Total Removals: 10,081 WH&Bs

FY02 End Alternative Population as of 9/30/02:	39,081
30% Removals between 10/01/02 and 2/28/03:	-3,024
FY03 Alternative Populations as of 2/28/03:	36,057
Foaling Rate (20%) between 3/01/03 and 6/30/03:	+ 7,212
Post-Foal Populations as of 6/30/03:	43,269
70% Removals Between 7/01/01 and 9/30/01:	-7,057
Alternative Remaining Population as of 9/30/03	36,212

WH&B Populations

FY2004 - 30/70% Removals



Fiscal Year 2004

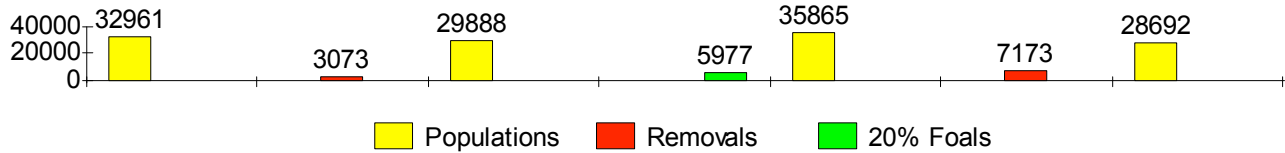
10/01/03 thru 9/30/04

FY04 Reported Total Removals: 9,899 WH&Bs

FY03 End Alternative Population as of 9/30/03:	36,212
30% Removals between 10/01/03 and 2/28/04:	-2,970
FY04 Alternative Population as of 2/28/04:	33,242
Foaling Rate (20%) between 3/01/04 and 6/30/04:	+ 6,648
Post-Foal Populations as of 6/30/04:	39,890
70% Removals Between 7/01/04 and 9/30/04:	-6,929
Alternative Remaining Population as of 9/30/04	32,961

WH&B Populations

FY2005 - 30/70% Removals



Fiscal Year 2005

10/01/04 thru 9/30/05

FY05 Reported Total Removals: 10,246 WH&Bs*

*USFS removals deducted

FY04 End Alternative Population as of 9/30/04:	32,961
30% Removals between 10/01/04 and 2/28/05:	-3,073
FY05 Alternative Population as of 2/28/05:	29,888
Foaling Rate (20%) between 3/01/05 and 6/30/05:	+ 5,977
Post-Foal Populations as of 6/30/05:	35,865
70% Removals Between 7/01/05 and 9/30/05:	<u>-7,173</u>
Alternative Remaining Population as of 9/30/05	28,692

WH&B Populations

FY2006 - NGS Removals



Fiscal Year 2006

10/01/05 thru 9/30/06

FY06 Reported Total Removals: 10,101 WH&Bs*

*Via BLM 2006 National Gather Schedule (NGS) - USFS removals deducted

FY05 End Alternative Population as of 9/30/05:	28,692
FY06 NGS Removals between 10/01/05 and 2/28/06:	-3,817
FY06 Alternative Population as of 2/28/06:	24,875
Foaling Rate (20%) between 3/01/06 and 6/30/06:	+ 4,975
Post-Foal Populations as of 6/30/06:	29,850
FY06 NGS Removals Between 7/01/06 and 9/30/06:	<u>-6,284</u>
Alternative Remaining Population as of 9/30/06	23,566

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

WH&B Populations

FY2007 - NGS Removals



Fiscal Year 2007

10/01/06 thru 9/30/07

FY07 Reported Total Removals: 7,365 WH&Bs*

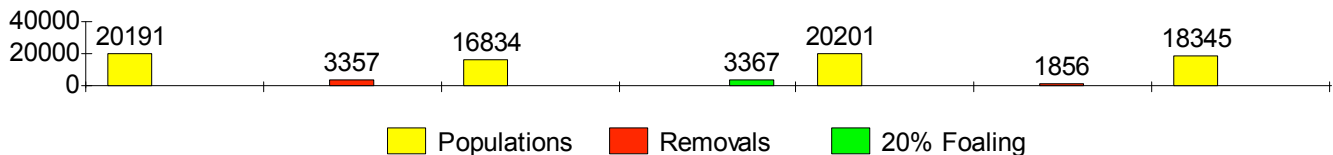
*Via BLM 2007 National Gather Schedule (NGS)

FY06 End Alternative Population as of 9/30/06:	23,566
FY07 NGS Removals between 10/01/06 and 2/28/07:	-3,615
FY07 Alternative Population as of 2/28/07:	19,951
Foaling Rate (20%) between 3/01/07 and 6/30/07:	+ 3,990
Post-Foal Populations as of 6/30/07:	23,941
<u>FY07 NGS Removals Between 7/01/07 and 9/30/07:</u>	<u>-3,750</u>
Alternative Remaining Population as of 9/30/07	20,191

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

WH&B Populations

FY2008 - NGS Removals



Fiscal Year 2008

10/01/07 thru 9/30/08

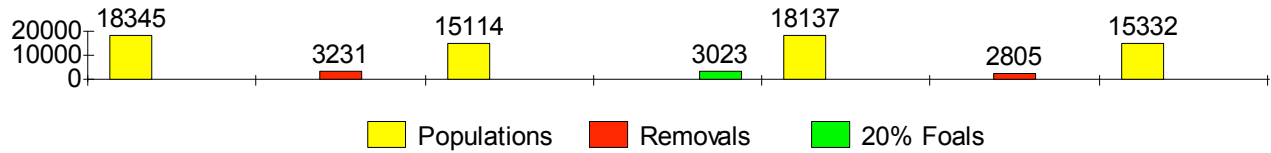
FY08 Reported Total Removals: 5,213 WH&Bs*

*Via BLM 2008 National Gather Schedule (NGS)

FY07 End Alternative Population as of 9/30/07:	20,191
FY08 NGS Removals between 10/01/07 and 2/28/08:	-3,357
FY08 Alternative Population as of 2/28/08:	16,834
Foaling Rate (20%) between 3/01/08 and 6/30/08:	+ 3,367
Post-Foal Populations as of 6/30/08:	20,201
<u>FY08 NGS Removals Between 7/01/08 and 9/30/08:</u>	<u>-1,856</u>
Alternative Remaining Population as of 9/30/08	18,345

WH&B Populations

FY2009 - NGS Removals



Fiscal Year 2009

10/01/08 thru 9/30/09

FY09 Reported Total Removals: 6,036 WH&Bs*

*Via BLM 2009 National Gather Schedule (NGS)

FY08 End Alternative Population as of 9/30/08:	18,345
FY09 NGS Removals between 10/01/08 and 2/28/09:	-3,231
FY09 Alternative Population as of 2/28/09:	15,114
Foaling Rate (20%) between 3/01/09 and 6/30/09:	+ 3,023
Post-Foal Populations as of 6/30/09:	18,137
<u>FY09 NGS Removals Between 7/01/09 and 9/30/09:</u>	<u>-2,805</u>
Alternative Remaining Population as of 9/30/09	15,332