

August 10, 2022

Delivered Via Email chris.christofferson@usda.gov

Chris Christofferson Forest Supervisor Modoc National Forest 225 West 8th Street Alturas, California 96101

RE: 2022 Planned Wild Horse Gather in Devil's Garden Plateau Wild Horse Territory

Dear Forest Supervisor Christofferson:

The California Farm Bureau appreciates the opportunity to provide comments on the Modoc National Forest's planned 2022 wild horse gather in Devil's Garden Plateau Wild Horse Territory.

California Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus, currently representing approximately 31,000 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers, ranchers, and foresters engaged in production agriculture to provide a reliable, safe, and affordable supply of food and fiber through responsible stewardship of our natural resources.

The recent aerial census in and around the Devil's Garden Plateau Wild Horse Territory estimated the current population at 1,205 adult wild horses, showing that wild horse populations still exceed the appropriate management level of 206-402 adult wild horses. This population exceeds what the habitat can support. For this reason, California Farm Bureau supports the planned 2022 gather of wild horses from the Devil's Garden Plateau Wild Horse Territory, a necessary step toward achieving an appropriate management level.

Long-term, over-population of wild horse populations creates substantial rangeland impacts and, in some cases, can push areas over critical thresholds that make rehabilitation nearly impossible. Additionally, drought conditions significantly magnify the impact of over-population in a way that not only further damages rangelands, but also causes health concerns for wild horses. Reducing the population of wild horses helps address impacts on aquatic resources, wildlife, grazing, and other traditional cultural practices.



California Farm Bureau also supports the continued use of helicopters and other motorized vehicles during planned gather operations. Wild horse gathers using helicopters have proven to be humane and effective tools for dealing with the larger numbers of animals that need to be removed over wide areas or through rough terrain. The notion of not using motorized vehicles and aircraft is misguided and is an attempt to stop gathers and the necessary reduction of wild horse over-populations.

For the reasons outlined above, California Farm Bureau supports the 2022 planned gather of wild horses in the Devils Garden Plateau Wild Horse Territory as well as the continued use of motorized vehicles and aircraft. If questions about this letter, please contact Erin Huston at ehuston@cfbf.com.

Sincerely,

JAMIE JOHANSSON

President