December 7, 2023

Delivered Via Email
BLM_CA_Bishop_MPWHT@blm.gov

Stephanie Heller
Mono Lake District Ranger
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Sherri Lisius
Bishop Field Manager
Bureau of Land Management
351 Pacu Lane, Suite 100
Bishop, CA 93514

RE: Proposed Wild Horse Gathers Outside the Montgomery Pass Wild Horse Territory

Dear Mses. Heller and Lisius:

The California Farm Bureau appreciates the opportunity to provide comments in support of the Inyo National Forest and Bureau of Land Management's proposed wild horse gather outside the Montgomery Pass Wild Horse Territory in Mono County, California.

California Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus, representing approximately 29,000 agricultural, associate, and collegiate members in 57 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.

California Farm Bureau supports full implementation of the Wild Free Roaming Horse and Burro Act (Act). This includes managing population numbers of wild horses and burros to protect rangeland health and the other authorized multiple uses that share the same ecosystem. Because the Act requires the establishment of herd population ranges within each herd management area, we strongly support gather schedules that reduce herd numbers to within these established ranges. The 2020 aerial survey of the Montgomery Pass Wild Horse Territory and surrounding areas counted 654 horses. Yet, per the 2019 Inyo National Forest Land Management Plan, the Territory is managed for a wild horse population of between 138 to 230 animals. The current population, at least triple the appropriate management level, exceeds what the landscape can support.

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. Reducing the population of wild horses helps address impacts on aquatic resources, wildlife, grazing, and other traditional cultural practices. The proposed gathers outside the Territory will help maintain sustainable wild horse herd management levels, protect resources on public and private lands, and benefit wildlife habitat. The proposed gather will also reduce the number of wild horses residing beyond the Territory thus improving public safety for motorists traveling on Highway 6 and Highway 120 East.

In addition to supporting the proposed gather, California Farm Bureau urges the Forest Service and BLM to further examine the Horse Management Area management plan. The agencies should also thoughtfully consider what will be done with horses after gather. The most effective way to reduce Wild Horse and Burro Program costs is to quickly decrease horse populations to minimum allowable numbers and maintain those populations utilizing tools such as fertility control, sex ratio adjustments, and occasional removals. Long-term holding of horses is incredibly costly. We encourage the Forest Service and BLM to explore improved pasture contract solicitation and utilization of existing land set aside programs such as the Conservation Reserve Program (CRP) as well as partnership with programs such as the University of California Cooperative Extension's Devil's Garden Colt Challenge in Modoc County, California.

For the reasons outlined above, California Farm Bureau supports the proposed gather of wild horses outside the Montgomery Pass Wild Horse Territory in Mono County, California. If questions about this letter, please contact Erin Huston at ehuston@cfbf.com.

Sincerely,

Shannon Douglass

SHANNON DOUGLASS
President