



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
CALIFORNIA



**BACKCOUNTRY  
HUNTERS & ANGLERS**  
NEVADA



**CALWILD**  
*Protecting Wild California*

USDI Bureau of Land Management  
Bishop Field Office  
USDA Forest Service  
Inyo National Forest

June 21, 2024

351 Pacu Lane  
Suite 200  
Bishop, CA 93514

**Re: Comments in Support of Removal of Wild Horses Outside the Montgomery Pass Wild Horse Territory DOI-BLM-CA-C070-2024-0001-EA**

Dear Jeffrey Starosta, Sherri Lisius and Lesley Yen,

The undersigned organizations express strong support for the removal of wild horses from public and private lands outside of the Montgomery Pass Wild Horse Territory (MPWHT) as indicated in the Preliminary Environmental Assessment promulgated by the Mono Lake Ranger District of the Inyo National Forest and Bishop Field Office of the BLM.

The 2020 population census for the MPWHT indicates a clear need for management action to bring the burgeoning wild horse population into compliance with the Wild and Free Roaming Horse and Burro Act of 1971. With the population dramatically exceeding the appropriate management level (AML) established for the territory and the near exponential growth capacity of the species due to the annual fecundity of mares, it is imperative to not only gather horses outside of the MPWHT, but also follow up with fertility control for the population.

The exploding population and range of horses outside the MPWHT has begun impacting habitat for native wildlife including several species of special concern and the imperiled bi-state sage grouse (BSSG),

a California Endangered Species Act candidate species. The project area for this proposed round up also includes U.S. Fish & Wildlife Service designated critical habitat for Sierra Nevada bighorn sheep, proposed critical habitat for the BSSG, and migration corridors for the Casa Diablo, Mono Lake and East Walker mule deer herds. Grazing from wild horses has been identified as a moderate threat in several of the bi-state sage grouse population management units and damage has been documented in international migratory bird nesting areas, tufa formations at Mono Lake, and around natural springs and wetlands in the region.

Native shrubs, grasses, forbs and riparian areas are not adapted to the intense pressures from modern equine herds and are subject to degradation, soil erosion, and a loss of biodiversity from those herds that exceed the carrying capacity for certain ecosystems. Competition for forage or water sources has also negatively impacted native wildlife as well as the horses themselves, and many reports have shown increased numbers of deceased horses on the landscape in the project area. In addition to the ecological detriments caused by large free-roaming bands of wild horses, there are also many documented vehicle-horse collisions to consider along roadways, including SR 120 E and US Highway 6. As the equine population burgeons, so does the risk to both the ecosystem and human safety.

We are encouraged to see the proposed inter-agency commitment to address this critical conflict, but we urge additional action by agencies and funding for tribes and NGOs to ensure that the population is managed according to the best available science to avoid the need for more frequent round ups. Investing in horse and burro fencing around watering sources and some riparian areas can be an effective mechanism to protect sensitive habitats and the wildlife that rely on them. Applying fertility treatments is another important measure to keep the horse populations in line with AMLs, however we recommend implementing fertility control measures only when the AML has been reached, and allocating resources to developing a non-invasive, single-application fertility control.

We are committed to conserving native wildlife, from sage grouse to pronghorn, native plants to pollinators, and the entire ecosystems that are currently under threat from wild horse herds which exceed the carrying capacity of the landscape. We appreciate your commitment to addressing this crisis, and we encourage additional action to address the problem from its core before it rears up once again.

Sincerely,

Devin O'Dea  
Western Policy & Conservation Manager  
Backcountry Hunters & Anglers

Bryce Pollock  
Nevada Chapter Policy Co-Chair  
Backcountry Hunters & Anglers

Steve Jarvis  
CEO  
California Deer Association

Eric Hanson  
California Chapter Co-Chair  
Backcountry Hunters & Anglers

Allison Weber  
Forest and Water Policy Director  
Friends of the Inyo

Michael J. Painter  
Coordinator  
Californians for Western Wilderness

Don Martin  
President  
California Chapter of the Wild Sheep  
Foundation

Linda Castro  
Assistant Policy Director  
CalWild