

THE WILDLIFE SOCIETY

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The Wildlife Society (TWS) appreciates the opportunity to provide additional comments on the U.S. Forest Service/Bureau of Land Management Supplemental Environmental Impact Statement (EIS) to Incorporate Greater Sage-Grouse Conservation Measures into Land Use Plans and Land Management Plans. The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association of over 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and its habitats worldwide.

In addition to our previous comments, submitted 7 February 2012, we would like to bring attention to the apparent conflict between conservation of native greater sage-grouse (*Centrocercus urophasianus*) and BLM's management of feral horses and burros. Greater sage-grouse are unique to the sagebrush steppe ecosystem in the western United States and Canada, and are a landscape species that inhabit lands owned and managed by multiple jurisdictions. Thus, the preservation of large tracts of suitable habitat and the management of these areas to maintain connectivity between populations along with the ability to document the effects of collaborative actions on population trends are imperative.

Feral horses are an exotic species in North America. Exotic, or non-native, species are among the most widespread and serious threats to the integrity of native wildlife populations because of their potential to invade and degrade native ecosystems. Exotic plant and animal species present special challenges for wildlife managers because their impacts on the native biota are poorly understood by the general public, and many people regard them as a component of the natural ecosystem. As a result, some exotic species have advocacy groups that promote their continued presence in landscapes where they are not native, and few policies and laws deal directly with their control. Feral horses (*Equus caballus*) that roam freely across western North America are examples of such species: they are iconic and much-loved by some, but damage wildlife habitat and require constant management through population reduction activities.

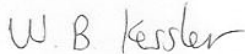
Herds of feral horses cause significant damage to the environment. Currently, estimates suggest that these herds, along with burros (*E. asinus*), range across more than 45 million acres in 10 states in the American west and 2 Canadian provinces. Large herbivores (both native and non-native) can disturb landscapes by trampling soils and vegetation, selectively grazing and over utilizing palatable plants, and altering the distribution of nutrients in the ecosystem. When horses are added to an ecosystem, little native habitat, from grassy plains to steeper rockier areas, is left undisturbed. Studies in the Great Basin have shown that areas inhabited by feral horses tend to

have fewer plant species and less plant cover than areas without horses, as well as more invasive plant species such as cheatgrass, which itself is widely known as poor wildlife habitat.

Given the effects that feral horses can have on greater sage-grouse habitat, we are concerned about how BLM will integrate management of sage-grouse with management of feral horses. We encourage BLM to examine use by feral horses in sage-grouse habitat and take appropriate actions to ensure that feral horses do not further contribute to the decline in sage-grouse numbers. Any analysis of feral horse management actions in priority sage-grouse habitat should include a thorough review of the possible direct and indirect effects on sage-grouse. Any Herd Management Areas (HMAs) within or containing priority habitat should be kept below established Appropriate Management Levels (AML). While we understand that BLM has certain obligations, set by legislation, regarding the management of feral horses, such obligations should not take precedence over management and conservation of a native species, such as greater sage-grouse.

We appreciate the opportunity to offer these additional comments on this effort, and look forward to participating further. Thank you for considering the views of wildlife professionals.

Sincerely,

A handwritten signature in black ink that reads "W. B. Kessler". The signature is written in a cursive style with a clear, legible font.

Winifred B. Kessler
President-Elect