



The Wildlife Society
Western Section
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June 26, 2024

Bureau of Land Management
Outside of Montgomery Pass PEA
351 Pacu Lane
Bishop, CA 93514

Subject: Preliminary Environmental Assessment: Removal of Wild Horses Outside the Montgomery Pass Wild Horse Territory

Summary of Comments

On behalf of the Board and membership of the Western Section of The Wildlife Society (TWS), the Conservation Affairs Committee submits the following comments on the subject proposed action dated May 28, 2024.

The Basis for Comments by the Western Section of The Wildlife Society

TWS was founded in 1937 and is a non-profit professional society representing wildlife scientists, biologists, managers, and educators dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The Western Section of TWS represents over 1,000 professional wildlife biologists residing in Nevada, California, Hawaii, and Guam. Our members are working wildlife biologists and wildlife professionals with extensive experience in wildlife population research and monitoring, conducting species- and community-specific wildlife surveys, evaluating sensitive species listing, and brokering mitigation agreements and compliance. Our collective professional training and experience provide a strong and unique basis for providing the following comments relating to the Preliminary Environmental Assessment (PEA).

Summary of Purpose and Need for the Project

The Bureau of Land Management (BLM) is proposing to remove excess wild horses from areas outside of the Montgomery Pass Wide Horse Territory (MPWHT) in compliance with BLM and the U.S. Forest Service (FS) obligations to address harm to natural resources, decrease populations of nuisance animals on private lands, and mitigate public safety concerns and liabilities along major highways within and near the MPWHT where vehicle strikes may cause property damage and harm to the public. Target removal areas include parts of the Mono Basin, areas adjacent to State Highway 120 and U.S. Highway 6, and private property owners

requesting nuisance animal removal. Feral populations have increased substantially in recent years with over 600 individuals now estimated using areas outside of the MPWHT.

Comments on the Plan

We find the PEA to be consistent with federal law, policy, and the requirements of the Bishop Resource Management Plan (BRMP) related to management of feral horses and burros and consistent with protection of natural resources on public lands; a responsibility of both BLM and the FS which should remain a high priority to avoid compromising wildlife and their habitat through competing public land priorities.

The Wildlife Society appreciates federal agencies' efforts to sustain healthy public lands. The sustained overpopulation of federally managed and ecologically feral wild horses and burros on public lands jeopardizes ecological integrity negatively affecting native wildlife species and hinders the ability of resource managers to conserve rangeland resources for succeeding generations. Areas occupied by overpopulations of horses and burros typically exhibit reduced plant species diversity, diminished plant cover, and an increase in invasive plant species. These negative effects cascade to wildlife, including small mammal and reptile populations, leading to lower abundances in areas inhabited by these herds. Furthermore, aggressive behavior exhibited by horses and burros around watering holes and grazing sites often excludes native wildlife including bighorn sheep; a declining and vulnerable species occurring near the Proposed Action.

The Wildlife Society has developed an Issue Statement on the topic of impacts to ecosystems from invasive horses and burros stating, in part, "Research in the Great Basin has reported that areas inhabited by feral horses have fewer plant species and less grass, shrub, and overall plant cover than areas without horses, and more invasive plant species and weeds such as cheatgrass, an invasive species that degrades wildlife habitat. Riparian and wetland areas may also be impacted by feral horses and burros through soil compaction and increased erosion. The overall impact feral horses and burros have on any type of ecosystem depends on intensity and duration of use, timing, and the health and resilience of the area. Where feral horse and burro density is high, lands are degraded, water resources are limited, and native species are already stressed, impacts can be substantial."

In conclusion, we support the Proposed Action and the PEA's thoughtful approach to achieving compliance with law and policy with respect to wild horse populations in the vicinity of the MPWHT.

Sincerely,

Kevin Hunting
The Wildlife Society, Western Section
Chair, Conservation Affairs Committee