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Organization: Wild Horse and Burro Fund

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Comments: As a wildlife ecologist who has done field evaluations of the Spring Mountain wild horses and burros and their habitats in all of the joint management areas occurring in this magnificent range, and having submitted detailed professional inputs over a period of many years, I take this opportunity to strongly protest your present plan for this complex wonderful wild horses and burros. The AMLs are genetically non-viable and the AUM resource allocations for forage are in violation of the WFHBA whose section 2c requires that the wild horses and burros receive the principal resources in their legal areas. I am aware that the grossly favored interest in the Spring Range is the big game hunting interest and that the Nevada Department of Wildlife has been and remains a very biased enemy of the wild naturally living horses and burros and that they go out of their way to either reduce them to crippling low populations or to eliminate them wherever possible. Therefore I urge you as federal agencies to fend for the wild horses and burros of the Spring Mountain Complex and not to be manipulated by a proven enemy of the wild equids here. These National Heritage Species are greatly valued by thousands even millions of people who come from near and far to appreciate, observe, photograph and learn from them. They enhance our quality of life and they enhance the Spring Mountain ecosystem in a great variety of ways. With their post gastric caecal fermentation they build healthy soils and disperse intact seeds for successful germination for a variety of important plant species. They complement the cloven hoofed ruminant herbivores such as deer and elk and they greatly mitigate and can even prevent catastrophic wildfires that now threaten so much of the West due to mounting Global Warming, subject of the international conference Global26 about to start. Equids are superior Carbon sequesters compared to ruminants and can greatly help combat Global Warming. I refer you to my recent publications on this and related positives concerning these returned North American natives that are accessible on my website. I have overflown the Spring Mountain and made professional reports on the herds and their habitats and greatly urge you to reconsider your proposed plan that would be a terrible injustice for these wonderful positively contributing equids. As ever, I remain willing to work with you to achieve a truly just and equitable plan for these much cherished mustangs and burros.