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First name: Craig

Last name: Downer

Organization:

Title:

Comments:

As a wildlife ecologist concerned with the wild horses of Devil's Garden Plateau WH Territory, I have visited & given input concerning these unique national heritage & returned native species for decades. After reading over your plan outlined in the EA, I am disappointed by the shallowness of the analysis & how it overlooks major impacts from particularly livestock as well as fences, roads & vehicles in the legal habitat of the wild horses. You should redo this EA as your proposed plan further jeopardizes the well being of this unique herd.

Of the alternatives presented, Alternative 4 is the one I favor as it would decrease livestock while increasing wild horses, would disallow sex ratio skewing that is unnatural and would disrupt social stability. I am also pleased that this does not allow GonaCon that has serious deleterious effects on the well being of mares & would cause much misery & lack of survival fitness among the herd. I greatly favor the re-establishment of the original Wild Horse Territory extension, that is the legal right of these unique & much appreciated mustangs.

I am concerned that the proposed action is lacking in an analysis of its overall "cumulative" impact. So many of California's mustang herds have already been eliminated or reduced to sub-viable population levels. Wild horses are a major prized asset to California as well as millions of visitors to the Golden State. To decimate this historic herd in favor of perpetuating the livestock monopoly in this area is extremely unwise and unjust and continues in the disreputable tradition of the "broken treaties" that the US government perpetrated against many indigenous tribes as well as the violation of humanity's respectful relationship to the Great Rest of Life.

In reducing the AML from 275 to 205 horses the proposed action further jeopardizes the overall fitness and resilience of this herd, compromising its ability to adapt to environmental changes, such as Global Heating, by weakening its genetic heterogeneity. Under Section 2 c of the WFHBA these wild horses should be given the principle resources in their legal area not cattle and sheep! Already the relative proportions are extremely unfair. Under the proposed action they shall be even more so! As a long-time observer of this herd who has given many inputs over the years, my personal enjoyment and professional appreciation of this herd would be terribly diminished should your proposed action be implemented.

I further recommend that you include all the Middle Section not just one narrow fraction thereof. There should be a broad connection between the two parts of the territory, not a narrow one. And the problem with fences must be addressed with the elimination of those within the territory to a much greater degree. And private land owners should fence out their property if they are not willing to share their land with the horses -- who, by the way, could have many beneficial effects for their inholdings, like wildfire mitigation, soil enrichment, seed dispersal and germination, etc.

The middle section has some very rich habitat and foraging assets and it is very discriminatory to disallow a large portion of this not to be occupied by the wild horses. This also impedes their free-roaming lifestyle and their natural rest rotation resulting from their daily and seasonal movements. It is extremely unfair and contrary to the true spirit and intent of the WFHBA to give this rich habitat forage to the livestock ranchers while disallowing the wild horses who have primary rights to it. This would also terribly affect the general public's ability to study, enjoy and appreciate a full and thriving mustang herd and their enhanced habitat -- enhanced by the wild horses themselves!

The USFS has eliminated most of its wild horses and burros from their legal territories since the WFHBA was

passed in 1971. It is egregious to do so to one of the last substantial remnant herds left on USFS lands!