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Comments: The Inyo National Forest (INF) & Bureau of Land Management (BLM) Bishop Field Office have prepared a Preliminary Environmental Assessment (PEA) for the Removal of Wild Horses Outside of the Montgomery Pass Wild Horse Territory (MPWHT). This PEA proposes to gather & remove most of this historic herd's wild horses, deemed excess, because, for various reasons, they have moved outside the MPWHT. Some of the reasons, in my opinion, are suspect. This major herd reduction would have a devastating effect on the herd's integrity. Yet, practical & caring alternatives exist to accommodate this precious & valuable herd at a more long-term-viable population level that would not disrupt the social units, or bands, or set back the horses' ecological adaptations.

I have thoroughly perused your PEA that seeks to justify the elimination of the great majority of the MPWHT/HMA wild horse herd. As a professional biologist knowledgeable of wild horses, I found the PEA to be extremely slanted & designed to discredit & nearly eliminate one of the most popular/studied herds in our nation. One major observation is your team fails to appreciate many of the substantial justifications for the horse's return as a native species in its evolutionary cradle along with the many positive contributions that horses make to natural ecosystems, including soils, plants, animals, & through superior Carbon sequestration (compared to ruminants) as well as mitigation/prevention of major wildfires.

Throughout the document, the horses are regarded as a barely tolerable invasive species & at nearly every opportunity are blamed for destruction to plants, animals, soils, riparian areas, water supplies, etc. So much negativity is a red flag! No where in the PEA is the well-being of the horses, both as individuals & collectively as an interbreeding population given serious consideration. The WFHBA seems of minor consideration when it came to actually valuing the wild horses themselves! Concerning the aerial census indicating the movement of much of the herd outside of the MPWHT/HMA toward Mono Lake, no where is there any critical examination as to just why this has been occurring! This would seem elemental. I notice the extensive cattle & sheep grazing that is permitted in the WPWHT/HMA, yet there is no discussion of possible harassment, driving of horses, fencing off of waters or prime forage & shelter components of the mustangs' habitat by vested interests, that would include not only the ranchers, but also hunters. Also, OHVers could be chasing the horses for fun & frightening them away from popular OHV areas. I did receive reports of all of these.

Another point concerns the possibility that the wild horses could be exercising a form of natural rest rotation, consistent with their wide-roaming, often semi-nomadic lifestyle. This could be seen as a wholesome behavior, letting land rest & recover & instinctively ingrained in horses. Little valuing of the loss of nearly all the wild horses to the general public who enjoy viewing them is shown, nor is the negative impact that this gutting of the herd would have on their social structures, including the harem-type band & the inter-reproducing/member exchanging collection of bands: the whole herd. Also, PEA lacks serious ingenious alternatives, such as the construction of semi-permeable, log-&-pole, buck rail fences as could be constructed of Jeffrey pines that grow abundantly here. These would protect sensitive areas such as along the shorelines where migratory birds nest as well as delicate formations such as sand tufa mounds, delicate springs sources, etc.

I recently visited South Tufa in late May & did not notice any significant destruction of tufa mounds by the horses. But I noticed horse droppings were positively causing much greener little meadows growing from soils enriched by horse feces. I even noticed Canadian geese grazing the grass in these meadows, also rabbits. I believe the droppings help neutralize harsh alkali soils, and this produces more productive micro-ecosystems. I observed many lepidoptera here pollinating a variety of plants. These positive impacts were overlooked in the PEA. I did take a photo of a husky young man climbing to top of a tall tufa mound to show off to his family, but

causing mound to crumble in several places. He did this in spite of visible signs warning people against this.

I believe through various forms of positive reinforcement/negative conditioning (not overly harsh), horses could learn to avoid certain areas, & where necessary the log-&-pole fences could exclude them.

When the different post-gastric caecal-fermenting, mono-gastric digestive system of horses was brought up as a contrast to the ruminant digestive system, I was disappointed that the major positive contributions (impacts) of this different digestion were not mentioned. This does "contribute to the diversity of life forms within the nation" (WFHBA) & relates to horses depositing more organically intact feces that contribute more greatly to the humus content of soils -- to the building of healthy soils, as well as to passing of more intact, germinative seeds of a greater variety. This also relates to increasing moisture retention in soils augmenting aquifers.

There was no discussion of the extremely low AML, of 138 low to 230 high for a mean of 184 horses. Given MPWHT/HMA has 207,921 acres, at mean there would be 1,130 acres/1.77 sq. mi. per individual horse! This is far from allowing the horses to fill their ecological niche! Also: AML fails to consider genetic health & major negative impacts on mustangs' ecological adaptation & intergenerational education by roundup were ignored. Also: cooperative agreements to expand MPWHT was not considered.