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Comments: I am writing to formally object to the proposed action to remove wild horses from the Montgomery Pass Wild Horse Territory (MPWHT). As a dedicated advocate for the humane treatment and conservation of wild horse populations, I urge the Bureau of Land Management (BLM) and the United States Forest Service (USFS) to abandon the current Proposed Action and instead undergo the detailed Environmental Impact Statement (EIS) process to consider the cumulative impacts of the Proposed Action.

The final EA fails to consider:

1. Relocating the horses: According to binding USFS regulations, the agency must consider relocating the removed wild horses.

In this case, the USFS should relocate the Montgomery Pass horses inside the Territory and address the ecological conditions that are causing them to leave their designated habitat. If that is not possible, they should evaluate other USFS lands where the horses could be relocated.

2. Reevaluating the AML: The BLM and USFS should conduct a thorough reassessment of the AML using new and updated scientific data to ensure it reflects the current ecological reality.

3. Implementing Fertility Control: Utilize humane, scientifically studied, and reversible fertility control initiatives to humanely manage the population of the herd, without resorting to removals.

4. The impact of Livestock Grazing: Assess and acknowledge the detrimental impacts of livestock grazing on the Territory and incorporate this understanding into all management decisions.

5. Protecting predators: A 25-year study on mountain lion predation shows this herd has been managed successfully by predation. This study provides invaluable insights into natural population control mechanisms and should be considered for re-establishing natural predation to manage the herd's population.

This proposed action is not guided by science and allows for the most outdated, costly and cruel methods of managing wild horses including helicopter roundups. An EIS must be prepared to fully understand the impacts of removing the Montgomery Pass horses down to AML.

Thank you for your consideration,
Sunnie Tallent