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Comments: It is very clear from the submission that Inyo National Forest Draft Decision and Final Environmental Assessment (EA)/Finding of No Significant Impact (FONSI) for the Removal of Wild Horses Outside of the Montgomery Pass Wild Horse Territory employed Reverse Engineering. The practice of data biasing towards the desired outcome. It is also clear from the write-up that there is a conflict of interest, and an Independent Review is needed. The roundups are extremely expensive, and the true costs are not disclosed. Not only is this cruel and unscientific system costing these animals their lives and their freedom, but it's also costing taxpayers hundreds of millions of dollars each year and losing revenue by not supporting and endorsing creative ways to have interactions between horse loving people and Free and Wild Horses.

According to the Bureau of Land Management (BLM), the Wild Horse and Burro Program cost taxpayers \$157.8 million in Fiscal Year 2023. As an example, for the Blue Wing Complex roundup alone, the contractor hired to conduct the brutal and soulless operation was paid \$624,870. These Horses are not disposable. They are living creatures that deserve better from their stewards, who after 78 years still lack the vision to properly manage the landscape and their wellbeing. The BLM lacks understanding of what "their customers, the taxpayers" want of the land that they have been entrusted to manage and the desirable environmental outcome with Horses roaming it. People want to experience the Horses Free and Wild; they are the symbol of freedom and the USA. The BLM is not managing the land efficiently; land that belongs to us, the citizens of the USA. They have proven time and time again their lack of financial acumen. They state in their website that they are for domestic tourism and keeping the landscapes healthy and productive for multiple uses, which letting the Horses roam free should be one of them. Tourists want to see the Free and Wild Horses, not a barren landscape. This mistreatment of the Wild Horses is unacceptable, they are the most wonderful symbol of freedom.

The BLM is not fulfilling their fiduciary duties to the taxpayers, proven by the lack of transparency on the cost of the roundups and by managing forcibly to destroy the landscape majesty and wildness embodied in the Horses. Fertility Control and allowing the Horses to roam free is a smarter and more efficient approach. This is a noble cause with huge rewards socially and financially and without the destruction that the BLM is seeking for these Noble Horses. It is appealing what is going on with these Wild Horses. It has been scientifically proven successfully the PZP fertility control program, which only costs \$30 per vaccine, and the groundbreaking Land Conservancy Project that are a far better investment, return on the money and Humane treatment of the Wild Horses and as result a better land management than the destruction caused by the roundups. The BLM would learn a thing or two from programs like these from great groups like the American Wild Horse Conservation (AWHC). They have innovative programs that show that there's a more humane and cost-effective alternative to protect and conserve our nation's assets, the Wild Horses and the landscape they roamed other than cruel and costly helicopter roundups. Due to all the reasons stated above, it would be wise to revisit the option of returning the land to the States to be managed by local organizations closed to the Land and the Wild Horses.