

**Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan #67845
Objection**

The objection was prepared following the criteria to be in compliance with 36 CRF 218(d).

1. Objector's Name; Address; Telephone Number; Email Address:

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2. Signature/Verification of Authorship: Nancy Cerroni

3. Not Applicable

4. On behalf of the Pryor Mountain Wild Mustang Center (PMWMC), Nancy Cerroni is submitting an objection to the proposed draft Decision Notice for the Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan #67845 presented by Amy Haas, Beartooth District Ranger of the Custer Gallatin National Forest.

The following sections meet the requirements of Items 5 & 6 of the required steps for commenting on this project (36 CFR 218.8(d),

This objection addresses two main issues of the proposed project that we believe the draft decision is in violation of law, regulation, or policy are summarized below using statements directly from the DN/FONSI. The PMWMC submitted substantive comments regarding the issues and will use those along with information arising after the designated comment opportunities as evidence to support the specific issues defined by this objection. The details for each specific issue will be described on designated pages of this objection.

Issue #1: Management of wild horses through Alternative 2 (Objection pp. 2-5)

- From Selected Alternative (p. 5): The Pryor Mountain Joint Herd Management and Wild Horse Gather Plan Environmental Assessment analyzed a range of management options to achieve the Forest Service's obligations under the Wild Free Roaming Horses and Burros Act of 1971 while also considering the unique heritage of the Pryor Mountain herd.
- From Decision and Rationale (p. 6):
 - "Alternative 2 as described in the PMWHR JHMAP and Gather Plan EA meets the underlying need for action...by establishing short and long-term objectives for the wild horse herd. "
 - "This Decision will establish a territory plan for the PMWHR, meeting requirements in law, policy, and regulation for the management of wild horses."
- From Authorized Action #2 (p. 7): Further defines managing for healthy wild horses using Alternative 2 HMAP overall management goals/objectives (EA p. 17) includes two wild horse management criteria:
 - Maintaining a level of genetic variety that avoids inbreeding depression.
 - "and maintaining characteristics that are typical of Pryor Mountain horses of mixed ancestry including colonial Spanish."
- From FONSI (p. 10): Addresses the first criteria as defined above, maintain genetic variety, but fails to recognize the second criteria to maintain characteristics of the Pryor horses.
 - Both short- and long-term effects: "Genetic heterogeneity of the herd would remain above the management threshold for heterozygosity."

- Both beneficial and adverse effects: “The reduction in wild horse numbers is not expected to have an adverse effect on the genetic variation of the herd”

Our objection to this issue is Alternative 2 does not define management options to maintain the unique heritage of the Pryor Mountain herd.

Issue #2: Reevaluation of the Appropriate Management Level (Objection pp. 5-10)

The appropriate management level is in accordance with H-4700-1, Wild Horses and Burros Management Handbook and the Forest Service Manual 2260 Wild Free-Roaming Horses and Burros. Our objection to this issue is the reevaluation of the appropriate management level is not in accordance with H-4700-1, Wild Horses and Burros Management Handbook (WHB Handbook).

Issue #1: Management of Wild Horses through Alternative 2

Forest Service Statement: District Ranger Haas supports Alternative 2 to meet the need for action as defined in the JHMAP EA and defines the authorized action to maintain the unique characteristics of the Pryor Mountain herd that are typical of Pryor Mountain Horses of mixed ancestry including colonial Spanish.

BLM Land Use Plan Statement: These statements are supported by BLM regulations as defined by the Land Use Plan. While the BLM Land Use Plan applies specifically to the BLM, Alternative 2 is based on an Amendment to the Resource Management Plan and therefore, has relevance to this objection. In that plan, Goal WH2 and MD WH-2 call to maintain a wild horse herd that exhibits any characteristics unique to the Pryor Horses (BLM RMP 2015). Alternative 2 fails to include provisions to implement that Goal and Management Decision.

Goal WH 2/MD-WH2: Maintain a wild horse herd that exhibits a diverse age structure, genetic diversity, and any characteristics unique to the Pryor horses. (Billings Field Office Approved Resource Management Plan September 2015 Section 3-31 Wild Horses (WH)

Alternative 2 includes the following phrase in the HMAP Objective: to “manage for healthy wild horses...to maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including Colonial Spanish,” (EA p. 18).

However, as explained below, Alternative 2, the proposed alternative of the BLM and the alternative supported by this Decision Notice, **fails to address how it will implement the criteria in the Resource Management Plan goal/management decision to “maintain characteristics unique to the Pryor Horses” or the Alternative 2 goal to “maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including Colonial Spanish.** “

Objection to Lack of Implementation Criteria to maintain characteristics typical of Pryor Mountain Horses: In Appendix O: Alternative Descriptions, the BLM has written three types of objectives to operationalize the HMAP goals. However, in the description for Alternative 2 (pp.5-6) there are no management objectives, monitoring objectives, or implementation objectives related to the goal to “maintain characteristics unique to the Pryor Horses. There are no removal criteria in the Gather Plan to preserve the CSH Type, which historically used what is now Appendix D as a basis for removals.

Alternative 2 will not maintain characteristics of Pryor Horses. In fact, failure to address this criterion within the alternative description will have a significant impact, as there is nothing that will require action on the part of the BLM to meet the goal.

The DN/FONSI fails to recognize that Alternative 2 is a random selection process as noted in the PMWMC comment in response to that alternative, “Removals would be made on a random selection based primarily on age and gender” (PMWMC Comments p. 20). The BLM confirmed this in the Response to Comments (Comment 1.1): “Under Alternative 2, BLM would remove horses randomly to meet sex ratio and age class management objectives.” A random selection process that does not include the maintenance of the characteristics of Pryor horses, does not follow the RMP goal nor the objective defined in the EA.

The FONSI has recognized only the measures used to manage for genetic heterozygosity and has failed to include provisions to maintain the ancestry which includes Colonial Spanish. The FONSI fails to recognize that the use of a random selection process and lack of operational objectives will result in a significant impact on the Pryor Mountain herd, because it will result in the permanent loss of important maternal bloodlines and the unique characteristics of the Colonial Spanish Type horse. This is a major departure from the 2009 HMAP, developed in cooperation with the Forest Service, and the 2015 RMP.

The role of the Forest Service in preventing the loss of these unique characteristics is especially important, as it dates back to the discovery of a herd of little Spanish horses in Custer National Forest at the turn of the twentieth century. Historians believe that this isolated band likely descended from Crow Indian horses to the north of what is now the Custer National Forest. The area to the east of Lost Water Canyon is now part of the PMWHR, and later genetic and phenotypic testing confirmed the prevalence of the Colonial Spanish Horse type in the Pryor herd. Thus, the Forest Service has an important role to play in continuing the practice dating back to the creation of the PMWHR of preserving the Colonial Spanish Horse type during gathers and removals.

Background: Previous Comments by the PMWMC

The PMWMC submitted comments to the Proposed RMP Amendment during the scoping period that predated the Preliminary EA. That Amendment replaced the use of historic bloodlines with the statistical measure of observed heterozygosity, and it is the basis for Alternative 2. This Objection reflects those comments and the PMWMC Protest. The full text is included here for reference, but a brief summary follows.

Unique Characteristics of the Pryor Herd/ The Colonial Spanish Heritage (PMWMC comments to RMPA Public Protest, Dec. 2024).

It is essential to point out that the unique characteristics of the Pryor herd largely originate from their Colonial Spanish heritage. 2015 RMP Goal WH-2 states the following: maintain a wild horse herd that exhibits a diverse age structure, genetic diversity, and any characteristics unique to the Pryor Horses,” but the proposed RMP amendment to MD WH-7 is not, in fact, consistent with Goal WH-2, because it

fails to consider the unique characteristics of the Pryor herd. Therefore, the BLM cannot support its claim at Section 1.5.1: Proposed BLM Field Office Resource Management Plan Amendment that there is an alignment with that Goal. The use of Observed Heterozygosity will not maintain the unique characteristics of this herd, as we explain in a later section. Furthermore, the 1968 Executive Order creating the PMWHR designated this HMA as one of only two public wild horse ranges in the U.S., to be “managed principally, but not exclusively, for wild horse herds.” An HMA is considered to be a “wild horse range when there is significant public value present, such as unique characteristics in a herd.” Thus, although the Proposed RMP Amendment points to the BLM WHB Handbook H-4700-1 to justify using Observed Heterozygosity for all HMAs, it overlooks the definition of a wild horse range in that same Handbook, cited at p. 58, and the implications for adopting a uniform approach for all wild horse herds. (Pryor Mountain Wild Mustang Center Protect. p.3).

Suggested Remedies to Solve Objection to Issue 1

Local observers first saw evidence of Spanish ancestry in the Pryor herd, including on Forest Service land, before the 1968 Executive Order creating the PMWHR. Scientists confirmed the presence of the Colonial Spanish Horse Type based on both phenotype and genotype in the early 1990s. Since then, the Pryor Mountain Mustang Center has cooperated with the BLM and FS to identify which horses to keep or to remove during periodic gathers based on those criteria. Considering recent evidence of mixed ancestry in the herd since outside introductions in the late 1980s, it is even more important now to identify and preserve that unique heritage. The best remedy would simply be to suspend this DN/FONSI until a replacement alternative could be developed that will incorporate measures to maintain the ancestry of the Pryor Horses.

The second suggested remedy is for the BLM to establish a logical place to add the criteria into Alternative 2. Alternative 2 is based on a random selection process based on possible genetic defects, age, and gender. In order to remedy the problems with the preferred alternative, the Alternative Descriptions in Appendix O need to be modified to include components specifically related to the “unique (typical) characteristics of Pryor horses.” First and foremost, unique characteristics must be defined. The 2009 HMAP added the Colonial Spanish Horse Matrix, based on decades of consultation by Dr. Phil Sponenberg, DVM with the BLM and FS, as the primary basis for its removal criteria. In the Pinyon Public folder, the Forest Service included that Matrix in Appendix D: The Colonial Spanish Horse (CSH) Matrix, which is invaluable for this work to build criteria for management of the Pryor herd. As stated in Alternative 2 and the Authorized Action, the characteristics of the Pryor horse have been altered by mixed ancestry. This situation makes it even more imperative to seek out ways to preserve the Colonial Spanish characteristics that are still evident in the herd. The inclusion of the CSH Matrix is essential to prevent significant harm to the unique characteristics of the herd.

This remedy would require the BLM to establish a logical place to add the criteria into the Alternative Description for Alternative 2. This remedy could fall into the selective removal criteria. However, if it is added into the selective removal criteria, it is imperative that it has a legitimate priority over gender and age. Including the CSH Matrix in Appendix O is essential to prevent significant harm to the unique characteristics of the herd which brings the FONSI into question. This objection is not about maintaining genetic heterogeneity, as stated in the FONSI, it is about the statement in Authorized

Action #2 to “maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including colonial Spanish” (p. 7) but not addressed in the FONSI.

The remedy would require a two-prong approach, to fully incorporate the Authorized Action to maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including Colonial Spanish into Alternative 2 and adjust the FONSI accordingly.

Issue #2

AML Re-Evaluation Decision: This Decision reevaluates the appropriate management level and establishes a number of horses that may be maintained on the Pryor Mountain Wild Horse Range while ensuring a thriving natural ecological balance. **The appropriate management level is in accordance with H-4700-1, Wild Horses and Burros Management Handbook and the Forest Service Manual 2260 Wild Free-Roaming Horses and Burros.**

The Objection to Issue #2: This objection concerns the highlighted sentence above. While the FS Manual 2260 (p. 9) provides a general description of establishing population, the Forest Service decision (p. 6) states that “the appropriate management level is in accordance with the JH-4700-1, WHB Handbook” to re-establish AML. **However, the methodology used in the EA is not in accordance with the BLM H-4700-1, and, as explained further, there is a serious question about the accuracy of the AML Re-Evaluation, and therefore there is a need to adjust or pause its implementation.**

This objection compares the following documents to show the lack of accordance between the two processes:

- BLM WHB Handbook Appendix 3: AML Establishment and Adjustment Process
- Proposed EA: Appendix C: AML Re-Evaluation Report

BLM WHB Handbook Appendix 3: AML Establishment and Adjustment Process

Appendix 3 defines a three-tiered process to establish or adjust AML (p. 67). Lack of adherence to two of the tiers in the EA is summarized in the table below:

Tiers as Defined in Appendix 3	Main Criteria used in the EA
Tier 1: Determine whether the four essential habitat components (forage, water, cover and space) are present in sufficient amounts to sustain healthy WH&B populations and healthy rangelands over the long-term. (see page 68)	Forage Availability (p. 68): - Utilization monitoring - Use pattern mapping The BLM did not have the utilization data or use pattern mapping as it was not available as defined in Tier 1.
Tier 2: Determine the amount of sustainable forage available for WH&B use. Based on the desired level of utilization, propose an AML (expressed as a range with an upper and lower limit). - As a first step, monitoring data should be reviewed to determine if Land Health Standards are being met.	The BLM determined that the Land Health Standards were not achieved. However, they did not follow the next steps as defined in Tier 2: - Determine if the level of WH use is a causal factor

- If Land Health Standards are not being met, examine wild horse use to determine if this level of WH use has contributed to the results. - Determine sustainable forage pending detailed analysis of <u>utilization data</u> and <u>use pattern mapping</u> for all users. (see page 70)	- Did not have utilization data and use pattern mapping needed to determine sustainable forage which is central to the definition of Tier 2.
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Proposed EA: Appendix C: AML Re-Evaluation Report

Appendix C: AML Re-Evaluation Report introduces a revised methodology (p. 10), Method 2: Carrying Capacity Calculation Based on Rangeland Health and Pounds of Production to calculate the proposed AML. This represents a change in methodology from previous practice that does not include utilization data and use pattern mapping necessary to produce a valid and reliable result.

Background: In Appendix C: AML Re-Evaluation Report. The BLM described two methodologies to calculate AML. Method 1 was from the 2016 AML Re-Calculation Report using data from 2007-2016. However, the EA introduces Method 2, a new process for the AML Re-Evaluation. As explained below, the lack of consistency in methodology and data needed to stay in accordance with the BLM WH&B Handbook and previous practice raises questions about the validity and reliability of the AML Reevaluation.

Based on guidance from the Wild Horses and Burros Management Handbook (H-4700-1) this AML calculation report uses multiple sources of data to provide the most informed analysis of the appropriate number of horses including: actual use, utilization, current year's production, annual precipitation, Assessment, Inventory, Monitoring (AIM) data, Ecological Site Descriptions (ESDs), and soil survey data. The handbook also recommends using 3-5 years of data. This AML calculation considers previous AML evaluations and incorporates data from 2007 through 2021.

In the original draft of the EA, the BLM's plan was to consider all data sources as defined above through the combination of both methodologies. It may have become apparent to them, that they needed Method 1 to fulfill the first four components listed above: actual use, utilization, current year's production, annual precipitation; however, they lacked recent data. The only semi-consistent data monitoring source available was the Assessment, Inventory, Monitoring (AIM) data. **However, this does not meet the criteria as defined, and therefore, is not in accordance with the BLM WH&B Handbook: Appendix 3.**

Objection to Lack of Adherence to Tier 1: To determine forage availability, the WHB Handbook discusses the use of utilization monitoring and use pattern mapping for the years evaluated. In addition the process defines the need for a minimum three to five years of both utilization monitoring and use pattern mapping (WHB Handbook Appendix 3: p. 1).

The BLM did not use either range utilization monitoring or use pattern mapping to re-establish AML. These data sources of Tier 1 are used in Tier 2 as variables in the WHB Handbook to determine forage sustainability for wild horse use in Tier 2. The variables and recent data in the EA replace those

in Tiers 1 and 2, and this replacement calls into question the validity and reliability of the proposed AML Recalculation. Only a pause in the implementation of the proposed AML, including gradual small-scale gathers and sufficient time to collect and analyze utilization data and use pattern mapping, can address this objection.

Evidence & Prior Comments to Support Objection to Lack of Tier 1 Data on Forage Availability

In April 2022, the Mustang Center recognized the WHB Handbook guidance to use range utilization monitoring to establish AML and made a FOIA request for the BLM-Billings Field Office data from 2018-2021. A response from the Department of Interior stated that there were no records responsive to the request (see attachment: PMWMC comments to Preliminary EA dated).

This comment was validated by the BLM Response to Comment 2.28 as included in Appendix P: Response to Comments.

#	Subject	Mustang Center Comment	BLM Response to Comment
2.28.	2022 AML Method 2, Tier 1	Commenter states that after a FOIA request was made for Range Utilization Studies: from 2018-2021. It was determined that the BLM had no records responsive to the request. The monitoring data for rangeland health assessments do not involve utilization data.	Utilization studies such as use pattern mapping or other utilization transects to characterize utilization across an area at a specified time of year <u>were not completed 2018-2021</u> .

Note: 2018-2021 are within the data collection years for Method 2.

The evidence as presented above regarding Tier I of the Establishment of AML is **not in accordance with H-4700-1, Wild Horses and Burros Management Handbook**. In turn, this impacts Tiers 2 as defined by Appendix 3 in that Handbook.

Evidence & Prior Comments to Support Objection to Lack of Tier 2 Analysis: Determine Sustainable Forage

Tier 2: Tier 2 determines the amount of sustainable forage available for WH&B use. As stated in the WHB Handbook, Appendix 3 on page 70:

Tier 2: Determine the AUMS of sustainable forage available for WH&B use. Based on the desired levels of utilization, propose an AML for WH&B.

The sustainable forage (carrying capacity) available for WH&B use within a HMA is determined pending detailed analysis of utilization data and use pattern mapping for all users, which as described earlier were components of Tier 1. Tier 2 sets the high and low range of AML based on the in-depth analysis of Tier 1 data.

Tier 2, as defined in the WHB Handbook (p. 70) outlines two types of data.

- **Monitoring Data:** Monitoring data is used to determine if the Rangeland Health Standards are being met. The BLM primarily used AIM (Assessment, Inventory, and Monitoring) for this purpose.

- **Utilization Data:** Determine sustainable forage (carrying capacity) available for WH use. The BLM did not have this data and attempted to use AIM and other sources to carry out this defined step in the AML re-evaluation.

The calculation process used in Method 2 is defined in Appendix C: AML Re-Evaluation Report as **Carrying Capacity Calculation Based on Rangeland Health and Pounds of Production**. The calculation, however, involved substitute variables that are not in accordance with the Handbook guidance, and call into question the AML Reevaluation itself. Each of the variables in Tier 1 of the Handbook that should be the basis for that Reevaluation will be discussed in more detail following the introduction of the three variables:

- **Total pounds forage:** Forage production is a critical component to establishing AML. Had the process followed Tier 1 in the WH&B Handbook, this would have been determined using actual utilization data.
- **Grazeable Acres:** The grazeable acres used to calculate AML were based on five ecological sites. This contrasts with the WHB Handbook guidance to utilize Use Pattern Mapping to determine levels of actual wild horse use.
- **Desired Level of Utilization:** The WHB Handbook Tier 2 definition includes the desired level of utilization and presents an example to determine a weighted average utilization based on Use Pattern Mapping.

Total Pounds Forage:

Forage Production: *The sustainable forage available for wild horse use within an HMA is determined pending detailed analysis of utilization data (WHB Handbook, Appendix 3 p. 70).* However, the BLM did not have utilization data as noted through the following comment and response:

#	Subject	Mustang Center Comment	BLM Response to Comment
2.28.	2022 AML Method 2, Tier 1	Comments questioning the 2022 Method 2, Tier 1, conclusions in regard to the “Analyze utilization data” component stating that only utilization data mentioned was Residual Production which was done during one month of one year (2021) to determine winter forage. Commenter states that after a FOIA request was made for Range Utilization Studies: from 2018-2021. It was determined that the BLM had no records responsive to the request. The monitoring data for rangeland health assessments do not involve utilization data.	The residual production data was collected during the fall of 2021 to estimate forage available for horses through the coming winter. Utilization studies typically contrast with residual production studies in that Utilization studies quantify amount of forage consumed and residual studies quantify amount of forage remaining. Utilization studies such as use pattern mapping or other utilization transects to characterize utilization across an area at a specified time of year were not completed 2018-2021.

Without utilization studies, the BLM turned to the use of “estimated forage production based on current conditions and compared to expected production on those sites and Historic Climax Plant Communities” (Appendix C. p. 4). The forage production estimate as described for each ecological site defined various data sources for each of the five primary ecological sites considered for AML. In the comments to the EA, the PMWMC reviewed the descriptions for each ecological site and found a variety of sources used to estimate forage production. These descriptions can be found in Appendix C. pp. 11-13.

The proposed AML determines carrying capacity calculation based on rangeland health and pounds of production. The chart below shows the assessments used for each of the Ecological Sites. The complete assessment process for the Rangeland Health Assessment is described starting on page 36. However, this section describes the use of the assessments related to Method 2 for AML Re-Evaluation.

Ecological Site	Assessment 2017-2021	Related Assessment
Silty	AIM	NA
Stony	AIM	NA
Limy		• 2004 NRCS • 2019 BLM Billings Field Office
Limy, Shallow		• 2004 NRCS (4 monitoring plots, 3 were averaged)
Shallow Clay	AIM Residual Production	• 2004 NRCS confirmed production level

Note: The use of AIM data was used to monitor the current conditions for each ecological site. The silty/stony sites were both associated with the upper elevation at Penn's Cabin (1,785 acres). The shallow/clay site is at the lower elevation of the horse range (778 acres). Thus only 2,563 acres, or 6% of the range was used to determine forage production estimates using current condition data.

This information calls into question the method used to calculate forage production, because there is no recent utilization data. The inconsistent use of the data sources, as shown above, without actual utilization data questions the integrity of the forage production (lbs./acre) used for calculation of AML. **The question becomes; how would AML be impacted if forage production was calculated using actual utilization data?**

Grazable Acres: The BLM used Ecological Sites to determine grazable acres for horse use. The total grazable acres used to calculate AML with Method 2 adds up to 15, 819 acres. This is only 39% of the total acreage of the PMWMC (40,056 as stated in EA Appendix B Rangeland Health Assessment (p. 1).

The chart below comes from the PMWMC comments (p. 13):

Additional Ecological Sites: Method 2 limits the grazable acreage to five Ecological sites as described in this table:

Ecological Site	% of PMWHR	Acres	Site Index
Silty	4%	1,161	Penn's
Stony	2%	624	Penn's
Limy	10%	9,625	BT/NPS/Britton Springs
Limy, Shallow		3,631	BTR/Sykes
Shallow Clay	Not Quantified	778	WY side of horse range boundary
Total Acres		15,819	
PMWHR Total Acres		40,056	
% Grazable Acreage		39%	

The grazable acres used in the calculation of AML is questionable due to the fact that the BLM did not utilize Use Pattern Mapping which would have provided better evidence of the actual grazable acres. Use pattern mapping provides evidence of actual horse distribution across the horse range. The reliance on Method 2 tends to underestimate the number of grazable acres as it is based solely on the five identified ecological sites. An increase in the acreage would greatly impact the AML re-calculation. **The question**

becomes; how would the AML change if the grazeable acres would increase to better represent actual horse use as documented through use pattern mapping?

Desired Level of Utilization: As stated earlier, Tier 2 requires the establishment of a desired level of utilization. However, the lack of Use Pattern Maps required the BLM to identify only a desired level of utilization which they set at 40%. The BLM showed no evidence that they followed a weighted average process, nor did they choose to follow past BLM management documents. This was noted in the PMWMC comments (p. 10). **Again, a question is raised, how would AML change if the utilization rate was returned to 45%?**

#	Subject	Mustang Center Comment	BLM Response to Comment
2.21.	2022 AML Method 2	Comments concerned with the change of 45% utilization rates in the 2009 HMAP to 40% in the current EA. The commenter is questioning BLM's assumption that the 5% difference accounts for dietary overlap between mule deer, elk, and bighorn sheep.	The 2004 NRCS report acknowledges that there is little dietary overlap between bighorn sheep and mule deer but is the greatest in the spring and summer months. The 5% utilization for animals other than horses accounts for that, when it does occur.
This BLM Response to Comment fails to include a statement from Appendix C: The BLM <u>assumes</u> approximately 5% of the 45% utilization objective accounts for the dietary overlap between mule deer, elk and big horn sheep with wild horses (p. 11).			

Suggested Remedies to Solve Objection

Clearly, we have shown that this Objection is to the Forest Service declaration, that “the appropriate management level is in accordance with the WHB Handbook H-4700-1” to re-establish AML (p. 6), and why the actual use of a different method from the Handbook calls into question the validity and reliability of the AML Reevaluation.

The only possible remedy to solve the objection to Issue #2 is to suspend any action on this Decision/FONSI in order to 1) verify the claims in this Objection that the AML reevaluation was not done in accordance with the WHB Handbook; 2) why reliance on Method 2 is problematic; and 3) recommend a remedy to the situation in order to gain accordance with the WHB Handbook.

It is necessary to move cautiously on the gather/removal process until the BLM and FS can resume the practice of conducting annual utilization studies and use pattern mapping in order to adhere to the WHB Handbook Appendix 3. In the EA, the BLM recommends the use of incremental gather/removal processes with the initial gather reducing the population to 150 horses with additional gathers/removals as needed (p. 19). This process, if used cautiously, would give the BLM time to implement utilization studies and use pattern mapping. Preferably, the reduction to 150 in two small gathers is preferable to one larger gather. A cautious gather/removal process will not only enable the BLM and FS to resume adequate range studies, but also help meet Issue #1 to maintain unique characteristics of the Pryor horses. The Suggested Remedies to Solve the Objection to Issue #1 (p. 4) will require time to fully address methodology to attain that goal.

Conclusion: We appreciate the opportunity to file this objection for this Draft Decision Notice/FONSI as presented by the Custer Gallatin National Forest in response to the Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan. We have presented two strong issues for the Objection. In addition, we would like you to be aware of the current situation of the high foal mortality in the last three years due, in part, to mountain lion predation. The question arises how this will impact the age structure used in Alternative 2 for gathers?

If you have any questions regarding our response, please email me at ncerroni@gmail.com.