

**Protest of:** Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan (67845):  
Decision Notice and Finding of No Significant Impact

**Protest submitted by:**

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**Title of Responsible Official:**

AMY HASS

Beartooth District Ranger

Custer Gallatin National Forest

Pryor Mountain Wild Horse Range

**Interest:** I have submitted comments during every protest period and/or public comment period with regards to the Pryor Mountain Wild Mustang herd since 2012, including the most recent comment periods in 2022 and 2023 and 2024/2025. I have been following the Pryor mustangs for more than 20 years and have spent many of those years taking a special interest in learning about and researching their lineage, bloodlines, and history of the herd. I have spent an immeasurable amount of time and years studying this herd, it's history, and it's genetic lineages becoming one of a few experts of the bloodlines of this herd.

**Issue(s) Protested:** The decision record selection of Alternative 2. Implementation will result in moving away from using lineage and genetic based management to using observable heterozygosity for management decisions.

**Protest:**

The decision record of selecting Alternative 2 will result in management and removal/gather decisions to discontinue the use of lineage and genetic based management to using observable heterozygosity for management and removal/gather decisions. This directly conflicts with the HMAP objective to manage to maintain the unique characteristics of the herd and managing to maintain genetic diversity. Neither of those objectives are possible through a process of randomized removals such as is proposed in Alternative 2. Not only will the management objectives be unable to be reached under Alternative 2, but I fear the implementation of Alternative 2 will bring about further law suits for that very reason. Law suits were filed the last time there was a proposed gather and interested parties felt the BLM's decision and proposed action did not properly take into account genetic representation. The court ruled against the BLM and the gather was postponed and no gather has taken place since then. Due to the size of the current population, a gather is indeed needed, however failing to account for genetic lineage in the removal considerations makes meeting the management objectives for the herd impossible and the likelihood of another lawsuit very probable. Another lawsuit is expensive, time consuming, and entirely unnecessary when there is a better option.

I will add direct quotes from my previous comments directly relating to this issue.

“I do not agree with shifting the management of these horses away from using genetic lineage knowledge. The herd was formerly managed without concern to genetic lineage until 2006 when it was realized that removing horses at random caused entire bloodlines to be wiped out and decreased the genetic diversity of the herd. There is absolutely no reason to go back to that type of management. The result of that would be drastically negative. In a small herd such as this, removing any horses of the targeted age range at random would result in irreversible loss of genetic diversity. Entire bloodlines would be eliminated at random leaving the remaining herd genetically vulnerable. With the organizations and key individuals who follow the herd so closely and monitor bloodlines and long term lineage there is no reason to move away from specialized management especially when it is the best option for the long term management of the herd. These organizations as well as individuals, myself included, are willing to share their bloodline information and knowledge that traces back to the beginnings of this herd. Using the BLM standard management practices for this herd would be the end of this unique herd.

I do not support the change to maintain levels of diversity using Observed Heterozygosity (HO) as it relies on receiving genetic diversity information after there has already been a decline. I think it is a much better idea to take a proactive approach rather than a reactive approach. It is better to prevent loss of genetic diversity than to try to fix the problem after it has already happened. If relying only on (HO) we will only be able to fix the problem after genetic diversity has already decline and it is impossible to reverse genetics that have already been lost. I strongly believe that the first and foremost consideration when choosing animals to be removed should be based their genetic representation within the herd and genetic diversity. Correct conformation and maintaining a variety of colors are also considerations to be considered but should not trump genetic representation. Given the hardships of nature these wild horses face from the moment they are born the vast majority of the population posses’ correct and desirable conformation due to the fact that those born with conformation flaws often do not survive. So even when selecting for genetic representation first, it will not likely lead to a loss of desirable conformation.”

“ I do want to take a moment to recognize the statement in the JMAP as follows, “Due to monitoring and documentation of the Pryor Mountain Wild Horses, management within the Pryor Mountain Wild Horse Range JMAP can be more specialized than that of most BLM management areas.” I very strongly agree with this statement and have actually mentioned this in all of my previous comments regarding plans proposed for the Pryor horses by the Billings BLM. I am very pleased to see this statement included in the JMAP proposal, however now in this 2023 EA there is the potential to shift away from this type of management. The result of that would be drastically negative. In a small herd such as this, removing any horses of the targeted age range at random would result in irreversible loss of genetic diversity. Entire bloodlines would be eliminated at random leaving the remaining herd genetically vulnerable. With the organizations and key individuals who follow the herd so closely and monitor bloodlines and long term lineage there is no reason to move away from specialized management especially when it is the best option for the long term management of the herd. These organizations as well as individuals, myself included, are willing to share their bloodline information and knowledge that traces back to the beginnings of this herd. Using the BLM standard management practices for this herd would be the end of this unique herd.”

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"I do support removing excess animals through selective removal criteria rather than removing horses at random. This is essential to maintain genetic diversity as well as the health and safety of the individual horses. These horses should first and foremost be in the "young horse age group" within the ages of 1-4 years old. This has been a precedent in the past and I support its continued use. Genetic representation should be a top priority for consideration among removal criteria."

"I do not support Alternative 2 for reasons discussed above. The BLM should continue to use the specialized management approach they have historically used with this herd."

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