

Data Submitted (UTC 11): 5/22/2025 2:08:56 AM

First name: Abbie

Last name: Branchflower

Organization:

Title:

Comments: Identification of lead objector when multiple names are listed on an objection:

Non applicable

Name of Proposed Project; Name and title of responsible official; Name of national forest and ranger district on which the proposed project will be implemented:

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

Amy Haas, Beartooth District Ranger

Custer Gallatin National Forest, USDA Forest Service Beartooth District

A description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project; if applicable, how the objector believes the environmental analysis of draft decision specifically violates law, regulation or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider:

To Whom it May Concern,

I am writing to file an objection in response to the Decision Notice prepared by Amy Haas, Beartooth District Ranger, and released to the public on April 9, 2025, identified as the draft Decision Notice for the Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan. As I submitted comments during the Bureau of Land Management comment period for the Pryor Mountain Joint Herd Management Area and Wild Horse Gather Plan Environmental Assessment I am eligible to file an objection to this project, in this case specifically on the Forest Service portion of the range, further identified through email correspondence (on April 16, 2025) between Nancy Cerroni and Amy Haas as also including a proportionate section of the herd itself (about 10%).

I object to the implementation of Alternative 2 (the Proposed Action) identified in DOI-BLM-MT-C010-2020-004-EA as this action proposes to "randomly" remove horses "to meet desired age class and sex ratios...until low AML is achieved." Although both the Bureau of Land Management and the Forest Service have an HMAP Objective to maintain the characteristics typical of Pryor Mustangs as part of their management strategies, Alternative 2 does not include any implementation objectives to meet this goal. While the Alternative does state that BLM would remove "excess horses from the range following selective removal criteria that maintain a level of genetic diversity to avoid inbreeding depression and maintain characteristics that are typical of Pryor Mountain Horses of mixed ancestry including Colonial Spanish," there is no concrete explanation for how this will be achieved in Alternative 2 and a random removal strategy does not lend itself to promoting genetic diversity or safeguarding the unique characteristics of the Pryor Mustangs.

This lack of action to protect the genetic diversity and unique characteristics of the Pryor Mustangs is directly connected to the written comments I submitted to protest the Proposed Land Use Plan Amendment (originally called Proposed RMP Amendment) through the BLM NEPA process this spring. This Amendment is part of the same joint-EA that both BLM and the Forest Service utilize. I protested the change to the Resource Management Plan Amendment that eliminated consideration of bloodlines when conducting management operations, as well as removed the reference to managing for "all representations in the herd." Furthermore, I protested the change to the amendment that indicated Observed Heterozygosity would be the only tool used to maintain genetic diversity in the population. While the BLM denied my protest, my rationale remains the same: this amendment

will cause significant and unnecessary harm to the genetic diversity, population health, and unique characteristics of the Pryor Mountain wild horses. It is a reactive approach: a decline in Ho can only be noted once the decline has begun, therefore requiring genetic loss to first take place before it can be addressed. However, the level of monitoring and documentation both currently and historically conducted on the Pryor Mustang population means there is no cause for reactive management.

As stated by BLM in the Preliminary Pryor Mountain Wild Horse Range Joint Management Area Plan (2020), "Due to monitoring and documentation of the Pryor Mountain wild horses, management within the Pryor Mountain Wild Horse Range JMA can be more specialized than that of most BLM managed herd management areas." This level of monitoring and documentation means that individual-based management is both possible and desirable. In this case, the BLM Wild Horses and Burros Management Handbook (H4700-1) can be used as a baseline, with the detailed lineage records maintained on the Pryor Mustangs complementing and supporting management. Individual-based management is superior to management based solely on Ho. Observed Heterozygosity is a valuable tool to support lineage-based management, however, it cannot and should not replace management through lineage as doing so poses a very real risk of genetic loss.

Thank you for this opportunity to comment on the decision. Should you have any questions about my protest, please feel free to email me.