



***Bureau of Land Management  
Director's Protest Resolution Report***

**Pryor Mountain Wild Horse  
Range Joint Herd  
Management Area Plan,  
Revision Appropriate  
Management Level, Wild  
Horse Gather Plan, and  
Proposed Resource  
Management Plan  
Amendment and  
Environmental Assessment**

March 6, 2025

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## *Acronyms*

<b>Term</b>	<b>Definition</b>
<b>AML</b>	Appropriate Management Level
<b>BLM</b>	Bureau of Land Management
<b>CFR</b>	Code of Federal Regulations
<b>EA</b>	Environmental Assessment
<b>HMA</b>	Herd Management Area
<b>HMAP</b>	Herd Management Area Plan
<b>Ho</b>	Observed Heterozygosity
<b>MD</b>	Management Decision
<b>MK</b>	mean kinship
<b>NEPA</b>	National Environmental Policy Act
<b>PMWHR</b>	Pryor Mountain Wild Horse Range
<b>PRMPA</b>	Proposed Resource Management Plan Amendment
<b>RMP</b>	Resource Management Plan
<b>RMPA</b>	Resource Management Plan Amendment
<b>SOP</b>	standard operating procedure
<b>U.S.C.</b>	U.S. Code
<b>WFHBA</b>	Wild Free-Roaming Horses and Burros Act
<b>WFRHBA</b>	Wild Free-Roaming Horses and Burros Act of 1971
<b>WH&amp;B</b>	wild horse and burro

## ***Introduction***

The Bureau of Land Management (BLM) Billings Field Office released the Pryor Mountain Wild Horse Range Joint Herd Management Area Plan (HMAP), Revision Appropriate Management Level (AML), Wild Horse Gather Plan, and Proposed Resource Management Plan Amendment (PRMPA) and Environmental Assessment (EA) on November 15, 2024. The BLM received 17 unique protest letter submissions during the subsequent 30-day protest period, which ended on December 16, 2024.

The planning regulations at 43 Code of Federal Regulations (CFR) 1610.5-2 outline the requirements for filing a valid protest. The BLM evaluated all protest letters to determine which protest letters were complete and timely, and which persons have standing to protest. One letter was complete and timely but was dismissed because the protesting party who submitted the letter did not have standing to protest because they did not participate in the planning process previously. The remaining 16 letters were complete and timely and were from parties who had standing to protest. Of those, two letters contained valid protest issues related to the approval of the PRMPA. The BLM documents the responses to the valid protest issues in this protest resolution report. The protest decision is recorded in writing along with the reasons for the decision in this protest resolution report.

The protest procedures at 43 CFR 1610.5-2 apply only to the approval or amendment of a Resource Management Plan (RMP), as opposed to the approval of an implementation-level plan, such as a wild horse and burro (WH&B) HMAP or gather plan. Parties aggrieved by an HMAP or gather plan have different procedural rights and administrative review processes than parties who wish to protest RMPs (compare 43 CFR 1610.5-2 with 43 CFR 4.410). Accordingly, the BLM is not required to respond in this report to issues related to the approval of the Pryor Mountain HMAP, Gather Plan, or AML Re-evaluation Report.

The PRMPA is limited in scope. Under the PRMPA, the BLM would amend the 2015 Billings Field Office RMP Management Decision (MD) WH-7 to be more consistent with Federal laws, regulations, and policy related to management of genetic diversity in wild horse populations. The 2015 Billings Field Office RMP (BLM 2015) would be amended so that MD WH-7 would direct the BLM to maintain desirable levels of genetic diversity, as measured by Observed Heterozygosity ( $H_o$ ). If  $H_o$  drops below thresholds identified in the BLM Wild Horses and Burros Management Handbook H-4700-1 (BLM 2010), then the BLM would take any combination of the following actions to reduce the possible risks associated with inbreeding depression: (1) maximize the number of fertile, breeding-age wild horses (6 to 15 years) within the herd; (2) adjust the sex ratio in favor of males (but with not more than approximately 60 percent males); and/or (3) introduce mares or stallions from other wild horse Herd Management Areas (HMA), with priority for introductions from herds with characteristics similar to the Pryor Mountain horses, such as the Sulfur herd in Utah, the Cerbat Mountain herd in Arizona, or others. All other proposed MDs described and analyzed throughout the Pryor Mountain PRMPA/EA fall under the BLM's proposed HMAP, Gather Plan, and/or AML Re-evaluation Report, and are not subject to protest under 43 CFR 1610.5-2.

After careful review of the report by the BLM's Assistant Director for Resources and Planning, the Assistant Director concluded that the BLM Montana/Dakotas State Director followed the applicable laws, regulations, and policies and considered all relevant resource information and public input. The Assistant Director addressed the protests and issued a protest resolution report to protesting parties and posted the report on the BLM's website; no changes to the Pryor Mountain PRMPA/EA were necessary. The decision is sent to the protesting parties by certified mail, return receipt requested. Consistent with the BLM Delegation of Authority Manual (MS-1203 Delegation of Authority), resolution of protests is delegated to the BLM Assistant Director for Resources and Planning, whose

decision on the protest is the final decision of the U.S. Department of the Interior (43 CFR 1610.5-2(b)).

The report is divided into sections each with a topic heading, excerpts from individual protest letters, a summary statement of the issues or concerns raised by the protesting parties, and the BLM's response to the protests.

***Protesting Party Index***

<b>Letter Number</b>	<b>Protestor</b>	<b>Organization</b>	<b>Determination</b>
PP-MT-PM-EA-24-01	Faith Chm	--	Dismissed: No Standing
PP-MT-PM-EA-24-02	Cindy Stearns	--	Dismissed: No Standing
PP-MT-PM-EA-24-03	Anne Hamilton	--	Dismissed: No Standing
PP-MT-PM-EA-24-04	Nancy Cerroni	Pryor Mountain Wild Mustang Center	Dismissed: Comments Only
PP-MT-PM-EA-24-05	Margaret Lewis	--	Dismissed: Comments Only
PP-MT-PM-EA-24-06	Laurel Gress	--	Dismissed: Comments Only
PP-MT-PM-EA-24-07	Maggi Buttrell	--	Dismissed: Comments Only
PP-MT-PM-EA-24-08	Adam Kreger	Friends of Animals	Denied
PP-MT-PM-EA-24-09	Deborah Hansen	--	Dismissed: No Standing
PP-MT-PM-EA-24-10	Alessandro Trimboli Pitterman	--	Dismissed: Comments Only
PP-MT-PM-EA-24-11	Rebecca Falk	--	Dismissed: Comments Only
PP-MT-PM-EA-24-12	Abbie Branchflower	--	Denied
PP-MT-PM-EA-24-13	Elizabeth Lumsden	--	Dismissed: Comments Only
PP-MT-PM-EA-24-14	Sarah Griffin	--	Dismissed: Comments Only
PP-MT-PM-EA-24-15	Jannett Heckert	--	Dismissed: Comments Only
PP-MT-PM-EA-24-16	Kim Hover	--	Dismissed: Comments Only
PP-MT-PM-EA-24-17	Kerry Ferguson	The Cloud Foundation	Dismissed: Comments Only
	Ginger Kathrens		
	Jesse Daly		

## *Range of Alternatives*

### *Friends of Animals*

*Adam Kreger*

**Issue Excerpt Text:** BLM has rejected a number of reasonable alternatives which would accomplish the purpose and need of the RMPA and would do so with minimal management levels pursuant to the WFHBA's requirement. Instead of considering these alternatives, BLM has steadfastly stuck with its preferred course of action, in violation of NEPA's requirement to consider alternatives (42 U.S.C. § 4332(C)(iii)). For example, BLM failed to consider alternatives that would 1) expand the area for Pryor Mountain wild horses onto additional public lands, 2) require environmental analysis before each maintenance roundup, or 3) actually preserve the unique genetic heritage of the Pryor Mountain wild horses. These are all reasonable and BLM should have considered them as part of NEPA's requirement on alternatives.

BLM first claims that expanding the boundaries "goes beyond the scope of the project." BLM must manage horses where they were known to exist in 1971, BLM must manage wild horses as "an integral part of the natural system of public lands," and BLM must do so at a minimal feasible level (16 U.S.C § 1331; 16 U.S.C. § 1333(a)). None of these statutory mandates prevent BLM from allowing the horses more space on public lands and authorizing a corresponding increase in the AML.

### *Friends of Animals*

*Adam Kreger*

**Issue Excerpt Text:** BLM should analyze an alternative which will maintain the unique characteristics of the Pryor Mountain population. Doing so would allow BLM to comply with NEPA and with the WFHBA's mandate to manage horses at the minimal feasible level. Instead, BLM plans to take a heavy-handed approach which will not preserve the genetics of the Pryor Mountain herd.

### **Summary:**

Protestors stated that the BLM, in violation of the National Environmental Policy Act (NEPA) and the Wild Free-Roaming Horses and Burros Act of 1971 (WFRHBA), failed to consider previously proposed alternatives in the Pryor Mountain PRMPA/EA including to expand the area for Pryor Mountain wild horses, to require environmental analysis before each maintenance roundup, and to preserve the genetic heritage of Pryor Mountain wild horses.

### **Response:**

NEPA requires the BLM to analyze a reasonable range of alternatives, but not every possible alternative to a proposed action. "In determining the alternatives to be considered, the emphasis is on what is 'reasonable' rather than on whether the proponent or applicant likes or is itself capable of implementing an alternative. 'Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant'" (BLM NEPA Handbook, H-1790-1, at 50 (citing Question 2a, Council on Environmental Quality, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981); see also 40 CFR 1508.9(b)). An alternative may be eliminated from detailed study if it is determined not to meet the proposed action's purpose and need; determined to be unreasonable given the BLM mandates, policies, and programs; it is substantially similar in design to an alternative that is analyzed; its implementation is speculative or remote; or it is technically or economically infeasible (BLM Handbook H-1790-1, Section 6.6.3). When there are potentially a very large number



of alternatives, the BLM may only analyze a reasonable number to cover the full spectrum of alternatives (BLM Handbook H-1790-1, Section 6.6.1).

The BLM developed a reasonable range of alternatives that meet the purpose and need of the Pryor Mountain PRMPA/EA and that address resource issues identified during the scoping period. The Pryor Mountain PRMPA/EA analyzed four alternatives, which are described in Chapter 2 and Appendix O of the Pryor Mountain PRMPA/EA. The alternatives analyzed in the Pryor Mountain PRMPA/EA cover the full spectrum by varying in: (1) degrees of protection for each resource and use; (2) approaches to management for each resource and use; (3) mixes of allowable, conditional, and prohibited uses in various geographic areas; and (4) levels and methods for restoration. The BLM also properly considered all alternatives submitted by the public and provided appropriate rationale for having dismissed the alternatives from detailed analysis.

Regarding an alternative that would require additional environmental analysis prior to each gather, any decision regarding gathers and removals of WH&Bs would fall under the proposed HMAP and Gather Plan, not the PRMPA. Accordingly, this issue is not related to the PRMPA, and the BLM is not required to respond to this issue in this protest report.

Regarding an alternative to expand the Pryor Mountain HMA boundary, the BLM considered this alternative but dismissed it from detailed analysis as described in Section 2.6.5 of the Pryor Mountain PRMPA/EA (pp. 27–28). As explained in Section 2.6.5, the WFRHBA mandates that management of wild horses be limited to those areas of the public lands identified at the time that the WFRHBA passed on December 15, 1971. Specifically, “[n]othing in this act shall be construed to authorize the Secretary to relocate wild free-roaming horses or burros to areas of the public lands where they do not presently exist” (16 U.S.C. 1339). Accordingly, the BLM cannot expand the Pryor Mountain Wild Horse Range (PMWHR) outside of existing territory to include lands that horses did not use as habitat in 1971. Therefore, the BLM found this alternative to be unreasonable given the BLM’s legal mandates and dismissed it from detailed analysis.

Regarding conducting environmental analysis prior to each maintenance roundup or gather, Pryor Mountain PRMPA/EA Appendix K, *Comprehensive Animal Welfare Program for Wild Horse and Burro Gathers SOPs*, provides standard operating procedures (SOP) to “formalize the standards, training and monitoring for conducting safe, efficient and successful WH&B gather operations while ensuring humane care and handling of animals gathered” (Appendix K, p. 1). This appendix states that, “Prior to any gathering operation, the BLM will provide a pre-gather evaluation of existing conditions in the gather area(s). The evaluation will include animal conditions, prevailing temperatures, drought conditions, soil conditions, road conditions, and a topographic map with wilderness boundaries, the location of fences, other physical barriers, and acceptable trap locations in relation to animal distribution. The evaluation will determine whether the proposed activities will necessitate the presence of a veterinarian during operations. If it is determined that a large number of animals may need to be euthanized or gather operations could be facilitated by a veterinarian, these services would be arranged before the gather would proceed. The contractor will be apprised of all conditions and will be given instructions regarding the gather and handling of animals to ensure their health and welfare is protected” (Appendix K, p. 1). As such, the BLM’s SOP is to conduct an analysis of existing environmental conditions and of the animal conditions prior to any gathering operation as described in Appendix K of the Pryor Mountain PRMPA/EA.

Regarding an alternative that would maintain genetic diversity, the BLM considered an alternative to perform individual-based genetic management using mean kinship (MK) analysis, as described in Section 2.6.1 of the Pryor Mountain PRMPA/EA (pp. 24–25). As explained in Section 2.6.1, MK “measures the relatedness of each individual to the population as a whole based upon assumed parentage data. Individuals with low MK are distantly related to other individuals and may represent an important component of the genetic legacy of the founders that is not present in other individuals.

Although MK values are most often used to identify the genetically valuable animals in the population, they can also be used to identify those individuals whose genes are overrepresented. Individuals with high MK are closely related to a large fraction of the other horses in the population. To maximize genetic diversity while managing within the constraints of a resource-limited population size, individuals with high MK scores would be preferentially removed.” The BLM performed MK analysis on the entire Pryor Mountain herd. The MK analysis identified 25 individuals that are highly related to each other. However, “[c]iting concerns about data integrity, the board of the Pryor Mountain Wild Mustang Center decided not to provide the BLM with the names of the horses in the data set that was used for the [MK] modeling. Lacking the names of horses which correspond to the number substitution, the results of [MK] modeling cannot be used to inform gather decisions or conduct a detailed analysis of this alternative. In summary therefore, BLM does not have access to the necessary data, and results of MK analysis are not available to inform herd management at this time” (Pryor Mountain PRMPA/EA p. 25). Therefore, this alternative is technically infeasible and was dismissed from detailed analysis.

However, the purpose of the PRMPA is to amend the language of MD WH-7 in the Billings Field Office RMP (BLM 2015) to maintain desirable levels of genetic diversity in the herd, as measured by Ho (Pryor Mountain PRMPA/EA p. 7), which is carried forward under Alternatives 1 through 3 in the Pryor Mountain PRMPA/EA. Pryor Mountain PRMPA/EA Alternatives 2 and 3 specifically include an objective to “Manage for healthy wild horses, maintain a level of genetic diversity that avoids inbreeding depression, and maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including Colonial Spanish” (Pryor Mountain PRMPA/EA p. 18 and Appendix O, pp. 7–8 and 14). Alternative 2 was selected as the proposed action because it most closely aligns with management guidance in BLM Handbook H-4700-1 and how the BLM manages other wild horse populations across the west.

The BLM considered a reasonable range of alternatives in the Pryor Mountain PRMPA/EA in full compliance with NEPA and adequately provided rationale for any alternatives that the BLM dismissed from detailed analysis. Accordingly, this protest issue is denied.

## ***Wild and Free-Roaming Horses and Burros Act***

### ***Abbie Branchflower***

**Issue Excerpt Text:** In fact, given the extensive documentation present on such lineages and the resulting reduced need for interference with the existing population, such individual based management can be considered to support a management style at a “minimal feasible level of management,” as is the BLM’s responsibility under the Wild Free Roaming Horse and Burro Act of 1971, as amended, and its implementing regulations at 43 CFR 4700. Individual based management, in HMAs where this is possible, is supported by the 2014 National Research Council report which states in the section “Management Actions to Achieve Optimal Genetic Diversity” that the “goal of genetic management is to maintain as much as possible of the standing genetic diversity of a population and thereby provide the raw material needed to respond to environmental change.” To maintain genetic diversity in the Pryor wild horse population, management decisions should continue to be based on historic and current records of lineage and use such measures as Observed Heterozygosity to support this ongoing work, rather than replace it.

In conclusion, the State Director’s decision to support the Proposed Land Use Plan Amendment as outlined in Section 1.5.1 of DOI-BLM-MT-C010-2020-004-EA would cause unnecessary and unjustifiable harm to the genetic diversity of the Pryor Mustang herd and negatively impact members of the public who research the horses and steward the unique collection of lineage data on this population.

***Friends of Animals***

***Adam Kreger***

**Issue Excerpt Text:** In the EA, BLM stated that “BLM cannot cause all patrilineal or matrilineal lines to be propagated” in order to preserve genetic diversity. Nothing in the current RMP suggests that BLM must cause all lines of descent to be propagated. BLM even admits that not every male wild horses get to reproduce, again suggesting that their concern for overpopulation is misplaced. BLM has not conducted a roundup since 2015, and the population has not risen dramatically or even reached 200.

However, even if the population grew as BLM claims, BLM’s chosen methods would not protect Pryor Mountain herd. Under the RMPA, BLM will not be able to preserve genetic diversity and maintain a self-sustaining population of healthy wild horses as required by the WFHBA regulations (See 43 C.F.R. § 4700.0-6(a), EA at 6-8.). Instead, BLM will only monitor the Observed Heterozygosity (H0) of the herd. While this measurement can be a good indicator of how much diversity is found within a herd. It cannot prevent the loss of diversity; it can only inform BLM when loss of diversity has already happened. Thus, relying on H0 is wholly insufficient to protect the unique diversity found within Pryor Mountain wild horses.

***Friends of Animals***

***Adam Kreger***

**Issue Excerpt Text:** Lastly, even if the population were experiencing an 8% growth rate, and even if BLM were unable to expand the range through increasing the PMWHR acreage, the methods BLM plans to use would still violate the WFHBA and its regulations. As discussed above, BLM must conduct management activities “at the minimum feasible level.”(16 U.S.C. §1333(a)(1)) Replacing the unique horses in the PMWHR with horses from other HMAs would not “maintain a wild horse herd that exhibits a diverse age structure, genetic diversity, and any other characteristics unique to the Pryor horses.”(2015 Billings Field Office RMP at 3-31) This sort of intensive management and “zoolike” conditions was what Congress attempted to avoid when it enacted the WFHBA. It is not even clear that such introductions function as intended, as at least one other RMP found that stallions who were introduced from a different HMA “failed to assimilate into the existing herds and therefore did not contribute as they were intended.” BLM asserts without evidence that previous introductions of mares have worked out, but cites no example, and fails to account for the RMPA’s introduction of both mares and stallions... In BLM’s discussion of changes made as a result from the comment period, BLM only clarifies more specifically what these sex ratio numbers will be. The intensive management activity called for in the RMPA violates the WFHBA’s requirement to manage wild horses at the “minimal feasible level” and its duty to protect wild horses within the PMWHR.

***Friends of Animals***

***Adam Kreger***

**Issue Excerpt Text:** Even if the Pryor Mountain herds weren’t genetically unique, which several studies show that they are, allowing inbreeding and reducing the breeding pool will negatively impact fertility and viability in the herd. While a reduction in population may suit BLM’s preferred course of action, it does not comply with the WFHBA’s mandate that wild horses shall be “protected from capture, branding, harassment, or death.”(16 U.S.C. § 1331). BLM should not approve the PRMPA, as doing so will further degrade the genetic diversity. Similarly, bringing in both mares and stallions from other herds will obliterate the uniqueness of this herd. Not only is this wrong, but it also violates the WFHBA.

**Summary:**

Protestors stated that approval of the Pryor Mountain PRMPA/EA would violate the WFRHBA by:

- Causing unnecessary and unjustifiable harm to the genetic diversity of the Pryor mustang herd by only using Ho to monitor this diversity and failing to maintain a self-sustaining population of healthy wild horses.
- Failing to conduct management activities “at the minimum feasible level” by proposing the replacement of existing horses with horses from other HMAs.

**Response:**

The BLM’s authority and responsibility to manage WH&Bs on public lands arises from the WFRHBA, which states that it is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death. Pursuant to the WFRHBA, the BLM manages and protects WH&Bs in a manner that is designed to achieve and maintain a thriving natural ecological balance on the public lands (see 16 U.S.C. 1333(a)). The WFRHBA further directs that all management actions shall be at the minimal feasible level. BLM Handbook H4700-1 and Manual 4700 describe the authorities, objectives, policies, and procedures that guide the BLM’s management of WH&Bs on BLM-administered lands. The general management objectives for WH&B are to: (1) protect, maintain, and control healthy herds with diverse age structures, while retaining their free-roaming nature; (2) provide adequate habitat for WH&Bs through the principles of multiple use on BLM-administered lands; (3) achieve and maintain a thriving natural ecological balance with other resources; (4) provide opportunities for the public to view WH&Bs; and (5) protect WH&Bs from unauthorized capture, branding, harassment, or death.

Regarding concerns related to continued genetic diversity in the herd, under the PRMPA, the BLM would manage the Pryor Mountain herd in order to maintain acceptable levels of genetic diversity. The Pryor Mountain PRMPA/EA discusses the four indicators the BLM uses to measure genetic diversity: (1) the fixation index, (2) genetic similarity analysis, (3) allelic diversity, and (4) Ho (p. 32). The PRMPA specifically includes an objective to “Manage for healthy wild horses, maintain a level of genetic diversity that avoids inbreeding depression, and maintain characteristics that are typical of Pryor Mountain horses of mixed ancestry including Colonial Spanish” (Pryor Mountain PRMPA/EA p. 18 and Appendix O, pp. 7–8 and 14). As explained in the EA, the PRMPA would amend the language of MD WH-7 in the Billings Field Office RMP (BLM 2015) to maintain desirable levels of genetic diversity based upon Ho (Pryor Mountain PRMPA/EA p. 7), which is the measure of how much diversity is found, on average, within individual animals in the HMA. If Ho drops below thresholds identified in Handbook H-4700-1, then the PRMPA directs the BLM to take a combination of certain actions to reduce the possible risks associated with inbreeding depression. This most closely aligns with management guidance in BLM Handbook H-4700-1 and how the BLM manages other wild horse populations across the West, and would ensure continued genetic diversity within the Pryor Mountain herd. Accordingly, the PRMPA would not cause unnecessary or unjustifiable harm to the genetic diversity of the Pryor Mountain herd.

Moreover, the WFRHBA does not require that the BLM maintain genetic diversity within WH&B herds. Instead, implementing regulations direct the BLM to manage herds as “self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat ... [and] shall be considered comparably with other resource values in the formulation of land use plans” (43 CFR 4700.0-6(a)). BLM Handbook H-4700-1 defines “self-sustaining” as the ability of reproducing herds of WH&Bs to maintain themselves in a healthy condition and to produce healthy foals. The PRMPA would manage the herds as “self-sustaining” populations because it would not prevent the Pryor Mountain herd from continuing to maintain itself in a healthy condition or from producing healthy foals. As a result, the PRMPA complies with the WFRHBA and implementing regulations.

Finally, regarding introducing horses from other herds, the PRMPA would allow the introduction of horses from other BLM-managed herds as an available management option to increase genetic diversity if Ho drops below thresholds identified in BLM Handbook H-4700-1. As explained in the BLM's responses to comments on the Preliminary EA (see Appendix P of the Pryor Mountain PRMPA/EA), introduction of horses to the Pryor Mountain herd from other BLM-managed wild horse herds was recommended in the 2013 National Academies of Science report (NAS 2013), which "suggested that BLM consider facilitating genetic connections between multiple herds in the context of a metapopulation of connected sub-populations. Given the past connections between other herds and the Pryor Mountain horses, including a history of common ancestry from multiple domestic horse breeds, potentially introducing additional, well-selected wild horses from another herd would be associated with better long-term outcomes for this herd, requiring a lesser degree of management than it would if the BLM allowed herd size to exceed levels that undermine a thriving natural ecological balance in this ecosystem" (Pryor Mountain PRMPA/EA Appendix P, pp. 116–117). Therefore, the introduction of horses from other wild herds aligns with best available science and reflects management at the minimum feasible level in compliance with the WFRHBA.

The potential effects of introducing other horses are analyzed in Section 3.2 of the Pryor Mountain PRMPA/EA, which notes, "Introducing horses from other herds that are also thought to have higher than average level of Spanish ancestry could either minimize loss of Spanish alleles or, potentially, boost the relative contribution of such genetic characteristics in the Pryor herd. However, BLM's overarching goal with respect to herd genetic diversity is to maintain healthy horses and reduce risk of inbreeding..." (Pryor Mountain PRMPA/EA p. 38). Introducing a small number of wild horses from other herds is not expected to undermine the BLM's ability to manage this herd for HMAP objectives.

The BLM's proposed management related to genetic diversity under the PRMPA is consistent with the WFRHBA and implementing regulations. Accordingly, this protest issue is denied.

## ***References***

Bureau of Land Management (BLM). 2010. *Wild Horses and Burros Management Handbook*. BLM Handbook H-4700-1. June. Bureau of Land Management, Washington, DC. Available: [https://www.blm.gov/sites/blm.gov/files/uploads/Media\\_Library\\_BLM\\_Policy\\_H-4700-1.pdf](https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-4700-1.pdf).

Bureau of Land Management (BLM). 2015. *Billings Field Office Greater Sage-Grouse Approved Resource Management Plan*. Attachment 5 from the Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region including the Greater Sage-Grouse Sub-Regions of: Lewistown, North Dakota, Northwest Colorado, and Wyoming and the Approved Resource Management Plans for: Billings, Buffalo, Cody, HiLine, Miles City, Pompeys Pillar National Monument, South Dakota, and Worland. U.S. Department of the Interior, Bureau of Land Management. September. Available: <https://eplanning.blm.gov/eplanning-ui/project/72501/510>.

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