Wyoming
Department of Agriculture

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July 14, 2005

Jay D'Ewart
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

Dear Mr. D'Ewart:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Bureau of Land Management (BLM) Environmental Assessment (EA), Removing Excess Wild Horses from the Adobe Town and Salt Wells Creek Horse Management Areas of the Rawlins and Rock Springs Field Offices.

Our comments are specific to our mission within state government: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life of our citizens. We believe it's important we are kept informed of proposed actions and decisions, and continue to be provided the opportunity to express pertinent issues and concerns.

Alternatives

We strongly support your efforts to achieve the appropriate management level (AML) for wild horses in the Adobe Town Herd Management Area (HMA) and Salt Wells Creek HMA. Current population estimates are nearly double the ideal lower limit in the Adobe Town HMA with an additional 100 excess head outside the HMA south of I-80. The over population of wild horses degrade the range conditions and limit forage for livestock and wildlife, which also use these areas.

We encourage the BLM to choose Alternative 2, Removal of Excess Horses from the Adobe Town and Salt Wells Creek HMAs and Administration of Fertility Control to Selected Released Mares. While we fully support Alternative 1, the proposed action, we believe the benefits including the Immunocontraceptive Porcine Zona Pellucida (PZP) vaccine in Alternative 2 will supersede any negative outcomes. The negative outcomes are limited to possible allergic reactions, additional handling, and additional stress.

Wild horses lack the pressure of hunting and predation that wildlife have. Populations are limited only by forage, water, and human intervention. The implementation of the PZP vaccination will be an important tool to use to slow the population growth of wild horses or burros throughout the

West, including Wyoming. The herd will not be gathered again until 2008. We encourage the BLM to choose Alternative 2.

We agree with the BLM in not choosing Alternative 3 (no action). The degradation of the HMAs is inevitable when the horse population is allowed to grow exponentially. The eventual starvation is an inhumane method for controlling population.

Consent Decree
We support the current Alternative 2 proposal as submitted. Alternative 2 meets the direction and guidelines of the 2003 Consent Decree, which will be used until August 2013. We will not support a new alternative in the future should it not follow the consent decree. The following information as stated in the Consent Decree should be reviewed and must be followed.

"BLM will also use its best efforts for the gathers scheduled in 2004, and for future planned gathers during the term of this consent decree, to remove sufficient wild horses to meet the lower end of the AML that is currently set for each HMA."

"If BLM determines, based upon the results of any inventory and on projected reproduction rates, that the wild horse population in any HMA or other area in Wyoming is likely to exceed AML in the following fiscal year, the Bureau of Land Management shall in its budget submission to the Department of the Interior for the next budget cycle include a request to reduce that HMA back to AML. If the BLM fails to reduce the number of wild horses to AML by December 15 of the year of the next budget cycle, the State of Wyoming may petition this Court to compel removal of wild horses over AML in the HMA at that time based on the Wild free-Roaming Horse and Burros Act and applicable law."

The decree further states that "This Court shall have the continuing jurisdiction over this matter, the Parties to this Consent Decree, any disputes existing under this Consent Decree, and any alleged violations of this Consent Decree." The decree continues for ten years from August 28, 2003.

General
We support and reiterate the importance of your plan to achieve AML and to remove all horses outside of the HMAs. There is no reason to keep these additional horses for genetic diversity or herd supplementation. The EA indicates "genetic variability of the Salt Wells Creek herd is high, and Adobe Town herd is fairly high." The herds in the HMAs should continue to be maintained at the lower limit levels. The lower limit levels will help to maintain not only appropriate range conditions, but also body conditions for the horses, wildlife, and livestock. The removal of excess horses will also make future population estimations more accurate and easy to count.

Large populations are leading to smaller bands over a larger area, hence a very rough population estimate. We want to encourage the BLM to keep the every three year gather plan schedule as submitted. Finally, we encourage the use of alternative fertility vaccinations as new and improved vaccinations become available. The PZP vaccination is currently an experimental drug, which could very easily be replaced in the near future.

We thank you for the opportunity to comment. We look forward to being actively involved in the future efforts of wild horse management for the state of Wyoming.

Sincerely,

John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board