



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

January 27, 2017

Clay Stott
Wild Horse and Burro Specialist
Lander Field Office
Bureau of Land Management
1335 Main Street
Lander, WY 82520

Dear Mr. Stott,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for gathering of wild horses in the North Lander Complex; consisting of the Conant Creek, Dishpan Butte, Muskrat Basin, and Rock Creek Mountain wild horse Herd Management Areas (HMA) located within the Lander Field Office (LFO).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As wild horses affect our agriculture industry, our natural resources, and welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

With the current estimated population being well over double the High Appropriate Management Levels (AML) for wild horses on the range, the WDA strongly supports the removal of wild horses to low AML within the HMAs along with the removal of all wild horses outside of or adjacent to the HMAs. Bringing the wild horse populations to low AML is a must; any number of horses left on the range higher than low AML is not acceptable. It is also crucial LFO staff work closely and proactively with landowners/permittees in the HMA and surrounding areas. It is important to utilize the knowledge of the landowners/permittees to identify locations of wild horses at the time of gather. In addition, these landowners/permittees may know where wild horses have negative impacts on rangeland health. LFO should utilize this information in the National Environmental Policy Act (NEPA) document.

The WDA appreciates the comment to conduct fertility control treatments on the population, but we strongly encourage the LFO staff identify, analyze and implement all tools available in controlling wild horse populations within the North Lander Complex. The normal fertility control methods (PZP) is not effective in managing wild horse populations on its own. The LFO must consider and implement additional aggressive control methods throughout these HMAs. The WDA

Equal Opportunity in Employment and Services

BOARD MEMBERS

Jana Ginter, *District 1* • James Rogers, *District 2* • Shaun Sims, *District 3* • Amanda Hulet, *District 4* • Alison Lass, *District 5*
Bryan Brost, *District 6* • Kevin Schieffer, *District 7*

YOUTH BOARD MEMBERS

Kendall Roberts, *Southeast* • Richard Schlenker, *Northwest* • John Hansen, *Southwest* • Cameron Smith, *Northeast*

strongly encourages the LFO use methods identified and accepted in the National Academy of Science report (Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward). The LFO must analyze, in whole or in combination, the various fertility control methods in the NEPA document. We urge the LFO to fully address wild horse numbers and reduce the demand on short and long-term holding facilities.

Special considerations and management prescriptions needs to take place when evaluating wild horses and how they may directly impact species of concern, like sage grouse. The North Lander Complex HMAs are located within the sage grouse Core Area and the NEPA document should reference Wyoming Executive Order 2015-04. In order to protect rangeland resources and critical sage grouse habitats, LFO must aggressively manage wild horses. Other resources, such as livestock grazing and livestock grazing management are used as mitigation for managing sage grouse habitats, while wild horses and wildlife are not. Turning a blind eye toward the effects wild horses have on rangeland resources and forage utilization is unacceptable. The WDA insists the LFO fully analyze the impacts wild horses are having upon sensitive species habitats and rangeland health.

With this said, wild horses are also playing a larger role on impacting rangeland resources. A few years ago in the LFO (Arapahoe Creek Allotment) a pasture was determined to have met its forage utilization levels prior to livestock grazing season. Wild horses were determined as the causal factor by LFO staff. Livestock grazing producers were not allowed to utilize the pasture or the State Land leases located within the pasture due to wild horse forage utilization. This situation placed undue hardships on livestock grazing producers, who were faced with approximately one month reduction in season of use and were forced to relocate to other areas to graze. This example of wild horses impacting forage use, rangeland health and livestock permittees livelihoods must be considered and analyzed as an impact in this NEPA document. In addition, the WDA insists that if this occurs in the future, it should automatically trigger the wild horse removal process.

We appreciate the opportunity to comment on this Scoping Notice. We encourage continued attention to our concerns and look forward to providing valuable comments on a Draft NEPA document.

Sincerely,



Doug Miyamoto
Director

DM/cw

CC: Governor's Policy Office
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department

Wyoming State Grazing Board
Wyoming Stock Growers
Wyoming Wool Growers
Wyoming Board of Agriculture