



Wyoming  
DEPARTMENT OF *Agriculture*

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

December 07, 2012

Jay D'Ewart, Wild Horse and Burro Specialist  
Rock Springs Field Office  
Bureau of Land Management  
280 Highway 191 North  
Rock Springs, WY 82901

Dear Mr. D'Ewart,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for gathering of wild horses in the Adobe Town and Salt Wells Creek Herd Management Areas (HMA) located within the Rock Springs and Rawlins Field Offices.

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.

The WDA supports the removal of wild horses to the lower limit of Appropriate Management Levels (AML) within the HMAs along with the removal of all wild horses located outside HMAs, especially on private lands. We encourage the Bureau of Land Management (BLM) to meet the direction and guidelines set forth in the 2003 Consent Decree between the State of Wyoming and the U.S. Department of Interior, and insist the Consent Decree be referenced in the National Environmental Policy Act (NEPA) document.

We also encourage the BLM to identify, analyze and implement all tools available in controlling wild horse populations within the HMAs. This includes; removing wild horses within the HMAs and from adjacent lands outside of the HMAs; adjusting the sex ratio of remaining wild horses to a 60:40 sex ratio favoring stallions; treating all mares released with immunocontraceptive Porcine Zona Pellucida-22 (PZP); geld all mustangs or a portion of the mustangs released back into the HMAs; utilize SpayVac as fertility control; identify and spay mares of a certain age class that are to be released back into the HMAs. Each of these tools should be considered and analyzed in whole or combined to develop various alternatives in the NEPA document.

Special considerations and management prescriptions must be considered when evaluating wild horses and their direct and indirect impacts on species of concern, such as the greater sage-grouse. The HMAs are

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located within sage-grouse core area and the NEPA document must reference Wyoming Executive Order 2011-05 and BLM guidance on sage-grouse. In order to protect rangeland resources and critical sage-grouse habitats, wild horse management needs to occur. Livestock grazing and livestock grazing management is often adjusted to manage for sage-grouse habitats, while management of wild horses and wildlife does not. Turning a blind eye toward the effects wild horses have on rangeland resources is unacceptable. The WDA insists the BLM fully analyze the impacts wild horses are having upon livestock and livestock management, rangeland health, sage-grouse and sage-grouse habitats, and identify changes in management and mitigation measures that will occur in the NEPA document.

The Sage Grouse National Technical Team (NTT) Report states; "Wild horses and burros have the potential to impact habitats used by sage grouse by reducing grass, shrubs, and forb cover and increasing unpalatable forbs and exotic plants including cheatgrass...Wild equids have different grazing patterns than domestic livestock, thus increasing the magnitude of grazing across the entire landscape." BLM must address these impacts in the NEPA document. The NTT Report also states under the section for Proposed Authorizations/Activities: "For all HMAs within priority sage-grouse habitat, prioritize the evaluation of all AMLs..." The WDA encourages the BLM to consider lowering the AML for these HMAs based on sage-grouse habitats, drought conditions and due to the large amount of private lands (checkerboard) located within the HMAs.

Wild horses are playing a larger role on impacting rangeland resources and allotment management decisions. In 2011 in the Lander Field Office - Arapahoe Creek Allotment; a pasture was determined to have met its forage utilization levels prior to the introduction of livestock grazing. BLM staff determined wild horses were the cause. Livestock grazing producers were not allowed to utilize the pasture or the State Land leases located within the pasture due to wild horse use. 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 locate other areas to graze. This recent example of wild horses impacting forage use, rangeland health, livestock permittees livelihoods and sage-grouse habitat must be considered and analyzed as an effect in this NEPA document. Furthermore, the WDA insists that if this occurs in the future, this activity should automatically trigger the BLM to adaptively manage the wild horse herd and immediately begin the wild horse removal process.

Because wild horses are located both within the HMAs and in areas adjacent to the HMAs, it is crucial BLM 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 created negative impacts on rangeland health. We encourage the BLM seek this information to be utilized in the NEPA document.

Adobe Town and Salt Wells Creek HMA

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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,



Jason Fearneyhough

Director

JF/cw

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

Wyoming State Grazing Board  
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