



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

February 28, 2014

Mr. Scott Fluer, Wild Horse Specialist
Bureau of Land Management
Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Mr. Fluer:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the Bureau of Land Management, Lander Field Office's (BLM) proposed Environmental Assessment (EA) for the Double D Ranch Wild Horse Ecosanctuary.

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

The WDA supports private landowner rights to enter into an agreement with the BLM to house wild horses in an ecosanctuary. We believe moving Wyoming wild horses to the proposed ecosanctuary could slightly alleviate some burdens associated with wild horses in other areas around the state. The proposed ecosanctuary may also provide an economic boost to the area and the landowner. However, we do not believe these changes will sufficiently curb impacts wild horses currently have to rangelands throughout the state.

We suggest the BLM consider and address the following during analysis:

- Ensure a proper stocking rate is established, followed and adjusted as needed for the proposed ecosanctuary to minimize adverse impacts to resources.
- Address disease and animal health issues, especially pertaining to possible transmission to neighboring livestock; this would include disposal of dead wild horses.
- Incorporate a contingency plan that encompasses possible escape of wild horses from the proposed ecosanctuary, especially pertaining to the escape of sexually intact animals.
- Ensure the landowner understands Wyoming fence laws and recognizes Wyoming is a fence in state for horses.
- Consider implications to neighboring livestock on behavioral, reproductive and ecological levels
- Monitor animal husbandry practices, herd health and nutrition.
- Ensure that horses moved to the proposed ecosanctuary are horses from Wyoming rangelands and not from other states.
- Evaluate the overall benefit or "net gain", to rangelands, livestock grazing permittees, wild horse herds and other species, that this project may create.

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Further, we strongly believe every operation should set goals and objectives and have a clear management plan to reach them. Goals and objectives need to be realistically achievable, carefully thought out, and updated as progress is made. BLM should work closely with the landowner to ensure a management plan with goals is developed, implemented and evolves as necessary.

In conclusion, we support the private landowner's rights to partner with the BLM; however, we strongly encourage the BLM to focus their efforts on fully managing wild horse populations in Wyoming. This should include fertility control methods and development of non-reproducing herds. The WDA is concerned the BLM cannot financially and ecologically maintain if management does not change. We will remain interested as results from other ecosanctuaries, and possibly this proposed ecosanctuary, continue to emerge. We thank you again for the opportunity to comment and look forward to reviewing the future EA.

Sincerely,



Jason Fearneyhough
Director

JF/jb

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming State Grazing Board
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