



Matthew H. Mead, *Governor*  
Doug Miyamoto, *Director*  
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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.*

March 17, 2015

Benjamin Smith  
Wild Horse and Burro Specialist  
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Trent Staheli  
Wild Horse and Burro Specialist  
Lander Field Office  
Bureau of Land Management  
P.O. Box 589  
Lander, WY 82520

Dear Mr. Smith and Mr. Staheli,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for gathering of wild horses in the Red Desert Complex; consisting of the Antelope Hills, Crooks Mountain, Green Mountain, Stewart Creek and Lost Creek Herd Management Areas (HMA) located within the Rawlins and Lander Field Office (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 strongly encourages the Bureau of Land Management (BLM) to identify, analyze and implement all tools available in controlling wild horse populations within the Red Desert Complex. The normal fertility control methods (PZP) is not effective in managing wild horse populations on its own. The BLM must consider and implement additional aggressive control methods throughout these HMAs. The WDA strongly encourages the BLM 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 BLM must analyze in whole or combination of fertility control methods in the National Environmental Policy Act (NEPA) document. We urge the BLM 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 Red Desert Complex HMAs are located within the sage grouse Core Area and the NEPA document should reference Wyoming Executive Order 2011-05 and 2013-03. In order to protect rangeland resources and critical sage grouse habitats, BLM 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 is unacceptable. BLM neglects to

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manage wild horse movements and forage utilization. Wild horse management within sage grouse Core Areas needs to change with the change in management for sage grouse. The WDA insists the BLM fully analyze the impacts wild horses are having upon sage grouse and sage grouse habitats. BLM must also identify and analyze the changes in agency management and mitigation measures that will occur in the NEPA document.

With this said, wild horses are also playing a larger role on impacting rangeland resources. A few years ago in the Lander Field Office (Arapahoe Creek Allotment) a pasture was determined to have met its forage utilization levels prior to livestock grazing season. Wild horses were determined to be the cause by BLM 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, livestock permittees livelihoods and sage grouse habitat must be considered and analyzed as an impact in this NEPA document. In addition, the WDA insists that if this occurs in the future, this situation should automatically trigger the BLM to adaptively manage the wild horse herd and immediately trigger the wild horse removal process.

Wild horse populations are excessively undercounted, meaning there are more horses on the range than documented. The WDA insists on an accurate census/count of wild horses in the HMA, using the recommended census techniques in the National Academy of Science Report. An accurate count will assist in determining how many horses to remove, provide for an accurate number at Appropriate Management Levels (AML), and provide managers the best starting point to actively manage wild horses. 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.

The WDA strongly supports the removal of wild horses to low AML within the HMAs along with the removal of all wild horses located 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 to seek this information to be utilized in the NEPA document.

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	Wyoming State Grazing Board
	Rocky Mountain Farmers Union	Wyoming Stock Growers
	Wyoming Association of Conservation Districts	Wyoming Wool Growers
	Wyoming Game and Fish Department	Wyoming Board of Agriculture