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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 4, 2019

Wild Horse Specialist  
Worland Field Office  
Bureau of Land Management  
101 S. 23<sup>rd</sup> Street  
Worland, WY 82401

Worland Field Office,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Fifteenmile Herd Management Area Plan (HMAP) and Wild Horse Gather Environmental Assessment (EA) located within the Worland Field Office (WFO).

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 estimated population for the Fifteenmile Herd Management Area (HMA) for 2018 was 485 horses, 3-times the high Appropriate Management Level (AML) of 160 horses allowed. In 2019, it is expected the horse population will reach approximately 600 horses within the HMA based on a reproductive rate of 20-percent. The WDA strongly supports the WFO update the HMAP and perform a gather to bring the HMA back within its designated AML. In addition, we emphasize removing all horses located outside of the HMA and not returning them to the HMA.

However, we strongly oppose the Proposed Action of increasing the AML from 70-160 to 100-230 horses allowed within the HMA. The issue with increasing the AML to 230, is that gathers within Wyoming do not occur in a timely manner or occur when horses exceed the high AML level. According to Table 6 in the EA, the HMA exceeded AML in 2012 and there has still not been a gather in the last six years to address the excess amount of horses within the HMA. Therefore, raising the AML would not be prudent and would not address the underlying issue of simply too many horses remaining on the range after only a couple of years following increasingly rare horse gathers.

We do support Alternative 1 within the EA, which keeps the existing AML levels (70-160), gathers excess horses to low AML and adjusts the sex ratio to slow population growth. Alternative 1, would protect rangeland resources from deterioration associated with an overpopulation of horses, and maintain a thriving

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Fifteenmile HMAP and Wild Horse Gather EA

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natural ecological balance and multiple use relationship on public lands within the HMA consistent with the Wild Free-Roaming Horse and Burro Act.

We appreciate the opportunity to comment on EA. We encourage continued attention to our concerns and look forward to the WFO's decision and active management on the HMA.

Sincerely,



Doug Miyamoto  
Director

DM/cw

CC: Governor's Policy Office  
Rocky Mountain Farmers Union  
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