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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.

April 4, 2017

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 Adobe Town, Salt Wells Creek and Great Divide Basin wild horse Herd Management Areas (HMA) located within the Rock Springs Field Office (RSFO).

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 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 our recommendation; any number of horses left on the range higher than low AML is not sustainable. It is also crucial RSFO 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. RSFO should utilize this information in the National Environmental Policy Act (NEPA) document.

The Scoping Notice indicates Adobe Town is proposed to be gathered this fall and we recommend the entire Adobe Town HMA be gathered and not just the block federal or just the checker board. The WDA continues to strongly support the U.S. District Court ordered Consent Decree (dated April 3, 2013) with the Rock Springs Grazing Association (RSGA) to remove all wild horses located on RSGA's private lands and Wyoming's Checkerboard lands.

One glaring issue for this proposed gather is the lack of any proposed fertility control to be applied to wild horses released back onto the HMAs. We strongly encourage the RSFO staff identify, analyze and implement all tools available in controlling wild horse populations within these HMAs. The normal fertility control methods (PZP) is

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not effective in managing wild horse populations on its own. The RSFO should consider and implement additional aggressive control methods throughout these HMAs. The WDA strongly encourages the RSFO 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 RSFO should analyze, in whole or in combination, the various fertility control methods in the NEPA document. We urge the RSFO 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 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, RSFO 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 irresponsible. The RSFO should 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 Lander Field Office (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 suggests 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