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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.

May 3, 2016

Benjamin Smith, Wild Horse Specialist
Rawlins Field Office
Bureau of Land Management
1300 North Third Street
P.O. Box 2407
Rawlins, WY 82301

RE: Scoping for Adobe Town HMA Population Management Action

Dear Mr. Smith,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the proposed Adobe Town Herd Management Area (HMA) wild horse removal located within the Rawlins Field Office (RFO) of the Bureau of Land Management (BLM).

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 insists on the active management of wild horses within the HMA and adjacent lands. By law, the BLM must ensure a "thriving natural ecological balance" exists between wild horse populations, wildlife, livestock, and healthy rangelands throughout the state.

We fully support the proposed action to remove wild horses from the HMA to low appropriate management level (AML). This includes removing all wild horses from lands outside the HMA. We are aware the Rock Springs Field Office is proposing to gather the Checkerboard approximately one month earlier. We would strongly encourage the BLM combine the two projects to eliminate excess costs. In addition, performing two separate gathers has the potential to push wild horses from the block federal land back onto the Checkerboard.

The WDA also supports the proposed research project associated with the proposed action. The valuable information gathered could determine the actual impacts wild horses have on our rangelands and wildlife. However, this does not preclude the BLM from complying with the Wild Horse & Burro Act by requiring management of wild horses.

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Special consideration and management prescriptions must be considered when evaluating wild horses and their impacts on species of special concern, such as greater sage-grouse. The HMA is partially located in sage-grouse Core/Priority Habitat Management areas and the National Environmental Policy Act (NEPA) document must analyze this potential impact. BLM utilize livestock grazing management as mitigation for wild horses and wild horse impacts. Turning a blind eye towards the effects wild horses have on rangeland resources is unacceptable. We insist 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 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 consider lowering the AML for this HMA based on sage-grouse habitats, drought conditions and the fact that the AML for this HMA no longer includes the Checkerboard due to the 2013 Consent Decree with the Rock Springs Grazing Association.

We also encourage the BLM identify, analyze and implement all tools available in controlling wild horse population growth within the HMA. This includes; removing wild horses within the HMA and from adjacent lands outside of the HMA; 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 stallions or a portion of the horses released back into the HMAs; utilize SpayVac as fertility control; identify and spay mares of a certain age class released back into the HMAs. BLM should consider and analyze each of these tools in whole or combined to develop a broad range of alternatives in the NEPA document.

In addition, the Record of Decision for the Sage-Grouse Amendment (9-Plan) states; "To address the localized threat due to negative influences of grazing by free roaming WHB in Wyoming and Colorado, the BLM will focus on maintaining WHB HMAs in GRSG habitat within established AML ranges. This will be to achieve and maintain GRSG habitat objectives, including completing rangeland health assessments, prioritizing gathers and population growth suppression techniques, and developing or amending herd management area plans ..." BLM must consider sage-grouse management in the NEPA document and address wild horse management if they are impacting sage-grouse or sage-grouse habitats.

Wild horses are located both within the HMA and in areas adjacent to the HMA, 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 utilize this information in the NEPA document.

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We appreciate the opportunity to comment on the proposed project. We strongly encourage BLM to gather and remove wild horses from the HMAs and adjacent areas as soon as possible, to reduce further impacts to important wildlife and vegetative resources in the area.

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