



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

September 16, 2013

BLM Rock Springs Field Office
Wild Horse Scoping
280 Highway 191 North
Rock Springs, WY 82901

To Whom It May Concern:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the scoping for wild horses in the ongoing Rock Springs Resource Management Plan (RMP) and for Adobe Town Herd Management Area (HMA) for the amendment of the 2008 Approved Rawlins RMP.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is 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 is in support of the Bureau of Land Management (BLM) to provide multiple uses on public lands, which includes managing wild horse populations. We are disappointed the 2003 Consent Decree between the State of Wyoming and the BLM is no longer viable. Throughout the history and passing of the Wild Free-Roaming Horses and Burro Act in 1971, the BLM has developed HMAs with Appropriate Management Levels and Populations (AMLs). Unfortunately, the BLM fails to adhere to the AMLs within the HMAs for Wyoming's wild horse populations.

Due to the on-going challenges and history of ever-increasing wild horse populations, the WDA offers the following comments for BLM to analyze in the Rock Springs RMP and future amendment of the 2008 Rawlins RMP.

Analyze Current Conditions

WDA urges BLM research oil and gas development, wildlife populations, wild horse populations, and livestock Animal Unit Months (AUMs) from the early 1980's when the HMAs and AMLs were originally proposed and implemented. BLM should compare the 1980's numbers to current oil and gas development, wildlife populations, wild horse populations and livestock AUMs.

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We believe BLM's analysis will allow the public to make a more educated decision of how the ever increasing wild horse population is no longer sustainable given the current conditions. It is our understanding, livestock grazing permittees over the years have worked cooperatively with BLM to develop range improvement projects, including cross fencing and water developments to better utilize range vegetation across the allotment. Wild horses are no longer remaining in the HMAs for crucial winter range, but are instead increasing in population and utilizing the developed water and rangeland resources season-long. This is in direct conflict and contrast with livestock grazing, which is strictly limited primarily to rotational systems on a designated season-of-use.

Expand the Analysis for both RMPs

WDA believes the BLM should develop a much broader analysis for wild horse HMAs and AMLs. We recommend developing one alternative to remove all HMAs and zero out all AMLs in both Rocks Springs and Rawlins RMPs. BLM regularly analyzes a no grazing alternative for livestock grazing. While WDA fully opposes no livestock grazing, we believe a thorough analysis will provide the public more opportunity to provide comments for the Preferred Alternative.

In addition to an alternative for HMAs and AMLs, WDA requests BLM to develop a broad analysis for fertility control. The control methods should include, PZP, SpayVac, spaying and gelding, as well as any new scientifically identified methods. We are seeking a broad spectrum of fertility control in order to provide BLM with options to control wild horse populations above and beyond herding and removal of excess horses.

Analyze and Implement the Rock Springs Grazing Association (RSGA) Consent Decree

WDA fully supports BLM analyzing and implementing the Rock Springs Grazing Association Consent Decree (Decree). This is primarily due to past history and current conditions showing an increasing population of wild horses, and BLM's inability to consistently manage wild horses at the AMLs designated and agreed upon in the 2003 Consent Decree, or previously agreed levels.

The RSGA Decree will remove all wild horses on the checkerboard, with the exception of White Mountain HMA. RSGA will support horses on the checkerboard in the White Mountain HMA at an AML of 205 – 300 horses, encourage gathers to reach the low end of the AML, and insist on implementation of fertility control methods, inclusive, but not limited to PZP, SpayVac, spaying and gelding. Additionally, the Decree sets the Salt Wells and Divide Basin HMAs to zero wild horses, and Adobe Town no more than 225 – 450 wild horses.

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We appreciate the opportunity to provide scoping comments on the Rock Springs and Rawlins RMPs. We believe this issue is important to address and support a thorough analysis of a broad range of alternatives. If you have further questions, please feel free to contact us.

Sincerely,



Jason Fearneyhough
Director

JF/jw

CC: Governor's Policy Office
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Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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