



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

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Benjamin Smith
Wild Horse and Burro Specialist
Rawlins Field Office
Bureau of Land Management
1300 N. 3rd Street
Rawlins, WY 82301

Jeremy Artery
Wild Horse and Burro Specialist
Lander Field Office
Bureau of Land Management
1335 Main Street
Lander, WY 82520

Dear Mr. Smith and Mr. Artery,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Environmental Assessment (EA) for gathering of wild horses in the Red Desert Complex (RDC); 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 recognizes the importance of managing wild horses within the RDC and adjacent lands and insists Bureau of Land Management (BLM) actively manage wild horses to ensure an ecological balance between wild horse populations, wildlife, livestock and healthy rangelands exists.

We are disappointed the BLM did not address our scoping comments (dated March 17, 2015) and analyze a full range of alternatives consisting of all available tools for controlling wild horse populations, including permanent fertility control of both mares and stallions. The National Academy of Science report (Using Science to Improve the BLM Wild Horse and Burro Program: A Way Forward, 2013) recommends numerous other scientifically proven fertility control methods to address wild horse population growth and the demands placed upon short and long-term holding facilities.

Of the remaining Alternatives, WDA fully supports Alternative 2: Proposed Action. We believe it is imperative to remove all wild horses located outside the Herd Management Areas (HMA) and remove excess wild horses to the low end of Appropriate Management Levels (AML) within the identified HMAs. Page 6 of the EA states, "All wild horses outside of the HMA boundaries, between HMA's or in the checkerboard south of the Complex, would be removed."

Gathering all wild horses outside of the HMAs is extremely important. Alternative 2, states, "of the 2,185 wild horses of the Complex would be gathered (approximately 1,748 wild horses), approximately 1,705 wild horses would be removed." This description does not account for the over 400 wild horses located outside of the HMAs. The WDA expects the minimum number of wild horses removed from the within the HMAs and adjacent areas (based on the numbers provided in the EA) should be over 2,150 wild horses.

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WDA continues to believe wild horses are excessively undercounted and encourage BLM to make every effort to remove wild horses down to low AML. Any number of wild horses left on the range higher than low AML is not acceptable.

The EA shows the following (estimated population and AML range):

HMA	Estimated Population	AML Range	# over AML	* over AML
Stewart Creek	509	125-175	334	2.9
Lost Creek	234	60-82	152	2.85
Antelope Hills	231	60-82	149	2.82
Crooks Mountain	229	65-85	144	2.7
Green Mountain	982	170-300	682	3.27
Total	2,185	480-752	1,433	2.91

The Table above shows all the HMAs are approximately 3-times over high AML. The excess wild horses will compromise natural ecological balance in each of the HMAs if they are not removed. It is unacceptable for wild horses to reach these levels without active management and/or removed from the HMAs. BLM must begin to monitor for wild horse impacts on wildlife and vegetation. When populations exceed approximately 3-times AML, negative impacts are undoubtedly occurring to vegetative resources and wildlife habitats.

WDA supports BLM (page 43) including monitoring for wild horses in the Proposed Action. Monitoring is crucial to determine the impacts wild horses have on wildlife and vegetative resources. It is important for BLM to determine if the thriving natural ecological balance is actually being maintained.

WDA appreciates the BLM not considering livestock grazing when discussing wild horse management. In addition, WDA supports BLM staff committing to working closely with landowners/permittees within the HMAs and the adjacent areas and ensuring livestock grazing operations are not impacted during the gather. Landowners/permittees can assist in identifying locations of wild horses at the time of gather and areas where wild horses are impacting the natural ecological balance.

We appreciate the opportunity to comment on the EA. We strongly encourage BLM to gather and remove wild horses from the RDC and adjacent areas as soon as possible, so no further impacts are created 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