



Wyoming
DEPARTMENT OF *Agriculture*

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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.

August 13, 2010

Melanie Mirati, Wild Horse and Burro Specialist
BLM, Rawlins Field Office Bureau of Land Management
1300 N. Third Street
Rawlins, WY 82301

Dear Ms. Mirati:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Finding of No Significant Impact (FONSI), Decision Record and the Environmental Assessment (EA) WY-040-EA10-109 for gathering wild horses in the Adobe Town & Salt Wells Creek Horse Management Areas (HMAs) as a population management action.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, 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.

We believe the EA provides sufficient analysis and information supporting the Proposed Action, FONSI, and ultimately the decision record. The WDA supports Alternative A (Proposed Action) to implement a gather and fertility control program as described in the EA for the Adobe Town HMA and Salt Wells Creek HMA. The active management of wild horses in these HMAs is essential to achieve the objectives of the Rawlins Resource Management Plan (RMP) (BLM 2008), Green River RMP (1997) and abide by the stated regulations of the Wild Free-Roaming Horses & Burros Act (1971) management objects for wild horses.

We commend the Bureau of Land Management (BLM) for their development of a proposed action that includes removing excess horses from this area and adjacent lands using a selective removal strategy, collecting wild horse data for appropriate future herd management, and administering fertility treatments. The gathering of wild horses in this area is essential to achieving the appropriate management level (AML), ensuring a natural ecological balance to the range, and providing for the protection of rangeland resources. The Proposed Action also meets the direction and guidelines of the 2003 Consent Decree between the State of Wyoming and U.S. Department of Interior and the BLM.

We support the continued work of the BLM to manage wild horse populations in the State of Wyoming, while providing for the protection of rangeland resources. The gathering of wild horses provides for the continuation of healthy viable populations of wild horses on public lands for future generations to view and works to protect the delicate balance between rangeland resources and their multiple uses.

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In Section 3.3, it states, "Less range use by livestock in recent years is believed to be a contributing factor for achieving the rangeland health standards in the project area." We appreciate BLM's acknowledgment of the sacrifice livestock producers have made in managing their livestock to benefit the wild horses, sometimes to the detriment of their own operations. This is of great concern to the agriculture industry and can have profound negative effects upon the sustainability of economic viable livestock operations and the goal of maintaining open space. The BLM should not expect the continuation of this practice as a means to mitigate the overpopulation of wild horses. We urge the BLM to continue monitoring and perform gathers on a regular basis to keep herd levels at the low end of the AML to insure an ecological and multiple use balance.

We encourage BLM staff work closely and proactively with landowners /permittees in the Adobe Town & Salt Wells Creek Horse Management Area Complex in preparing for the gather as well as during the gather operations. Since a large portion of the area in these HMAs is under checkerboard land pattern ownership, the wild horse overpopulation impacts are more critical to private landowners. It is important to utilize the knowledge of these landowners/permittees to identify the location of horses at the time of the gather, in addition to where these wild horses cause negative impacts on the natural ecological balance of the range.

We appreciate the opportunity to comment on the Adobe Town & Salt Wells Creek Horse Management Area Complex Wild Horse Gather Environmental Assessment. We look forward to hearing of your decision about this project and urge your agency to continue to keep us informed of the current status of this project.

Sincerely,



Jason Fearneyhough
Director

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CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
State Grazing Board
Wyoming Association of Conservation Districts
Rocky Mountain Farmers Union
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