



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.*

March 3, 2011

Ms. Sylvia Baca  
Deputy Assistant Secretary for Lands and Minerals Management  
Department of Interior  
1849 C Street NW  
Washington, D.C. 20240

Re: National Wild Horse and Burro Program

Dear Deputy Assistant Secretary Baca:

The Wyoming Department of Agriculture (WDA) has worked closely with agriculture producers, Bureau of Land Management (BLM) staff and many other partners in the management of wild horses in Wyoming since the creation of the Wild Free-Roaming Horses and Burros Act of 1971 (Act). Throughout this time, we have observed wild horse numbers and their impacts to Wyoming's range resources. We are extremely concerned with the current situation and future management strategies.

We acknowledge the tenuous situation which currently exists with the management of the wild horse and burro program within BLM. Our goal is to act as partners in helping BLM manage the horses on Wyoming range as provided for in the Wyoming Consent Decree (Decree) in effect since 2003. This Decree was a product exemplifying our firm stance affirming BLM proactively manage wild horses within the Herd Management Area boundaries at the established Appropriate Management Level (AML). Our stance remains the same, BLM should proactively manage wild horses as stated in directives of the Act.

The WDA supports a sustainable wild horse program in Wyoming which achieves the BLM goal of managing healthy animals on health rangelands now and in the future. In these environments, a very fine line exists between being in balance and tipping the scale to become out of balance. After spending time over the years in the field, it is very apparent certain areas are out of balance which impacts all of the multiple uses on the land.

Nearly 24% of land within Wyoming HMAs is not owned by the federal government representing a significant contribution by private landowners. BLM wild horse program

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management decisions infringe on their private property rights. We ask for your continued attention to wild horses living outside the HMA boundaries and acknowledgement of these additional burdens on landowners. These factors compromise their ability to manage the resources in a sustainable manner which threatens sustainability of agriculture in Wyoming for future generations.

We want to emphasize wild free-roaming horses are just one use of lands managed by the BLM. As stated in the Act, the Secretary is authorized and directed to protect and manage wild free-roaming horses and burros as components of the public lands. The Federal Land Policy and Management Act of 1976 (FLPMA) requires the BLM to manage public lands and resources according to the principles of multiple use and sustained yield. Additional congressional mandates, federal statutes, and implementing regulations also call for multiple uses on BLM administered lands. It is critical to maintain the health of the resource to insure livestock grazing which represents a vital economic value to agriculture producers and to the local communities in which they live and do business.

The natural resources present (i.e. water, soil, forage) in the Herd Management Areas (HMA) are largely limited. Resources in Wyoming differ from other areas and should be managed with these differences in mind. The three main users competing for the forage resources include horses, livestock and wildlife. All three are important to the ecosystems in which they live. It is imperative all three of these uses are proactively managed to insure health of the resource.

Many times forage is not the limiting factor on the range for free-roaming horses, livestock or wildlife. Water is often the limiting factor and its limited distribution on the range also limits the distribution of animals within an area. Protecting the water resource and the riparian area around the water are concerns to us and have been greatly compromised in many areas due to the over population of free-roaming horses. When riparian areas are negatively impacted by this over population, too often the BLM's management response is removing cattle and sheep while continuing current management of the wild horses. We do not support this unequal management response to competing multiple uses.

The WDA requests the BLM consult with the Wyoming Department of Game and Fish Department when preparing to conduct wild horse census counts as directed in the Decree. Methods, timing, topography, and weather all contribute to the accuracy of wild horse population estimates. Based upon previous census data provided by the BLM, we are concerned the numbers are well below the actual number of wild horses impacting the resource. It is essential for management to be effective the numbers of wild horses be representative of true story on the land.

The WDA believes range inventories, assessments, and base-line data are needed to assess whether the overall goal for the program is being met. Without this data, BLM cannot provide for an objective assessment of whether free-roaming horses are maintaining a

thriving natural ecological balance with other multiple uses. We would encourage more resource monitoring to identify impacts of free-roaming horses on the range. Developing water in areas with limited distribution could reduce impacts on current riparian areas and allow for more even utilization of the forage resource within current HMAs.

In closing, the WDA supports continued efforts to proactively manage the wild horse populations in Wyoming through a variety of tools available for use including gather and removal. We ask you consider our concerns and would be happy to provide further assistance in developing solutions for wild horse management. We look forward to continued work with the Wyoming BLM to address the management of wild horses.

Sincerely,



Jason Fearneyhough  
Director

JF/ljs

CC: Bob Abbey, Director, BLM  
Don Simpson, Wyoming State Director, BLM  
Scott Talbot, Director, Wyoming Game and Fish Department  
Don Schramm, Rock Spring Grazing Association  
Governor's Planning Office  
Wyoming Board of Agriculture  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Association of Conservation Districts  
Jeannie Lesieutre, Wyoming Wild Horse & Burro Specialist  
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