



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.

February 22, 2011

Patricia L. Hatle
Bureau of Land Management – Cody Field Office
1002 Blackburn Avenue
Cody, WY 82414

Dear Ms. Hatle:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Environmental Assessment (EA) for the proposed implementation of a fertility control field darting program for the McCullough Peaks Herd Management Area (HMA).

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, the balance of 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.

The WDA supports the expectations for the proposed action as stated with the short-term goal to bring growth rates to less than five percent and the long-term goal to reduce the need for gathers and removals, without jeopardizing the genetic health of the herd. We continue to advocate for maintaining HMA populations per the Appropriate Management Level (AML) set in the Consent Decree.

The WDA supports the use of fertility control field darting as *one* management method to maintain horse populations in the McCullough Peaks HMA. We believe the information obtained from this action will provide the needed data to either support or dispute the continued use of Porcine Zona Pellucida (PZP) as an effective wild horse population control tool.

We are particularly concerned with the numbers as presented in Appendix D – Population Modeling. The population modeling results using fertility control only for the eleven years of the EA show a minimum number of horses at the end of the period somewhere between 146 and 177 which is over the AML. The maximum population size for the eleven years of somewhere between 558 and 1117 horses is unacceptable.

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The WDA requests language added to the EA to inform the public that fertility control application is not the only method of population management that may be utilized moving forward. Per the Consent Decree, when information is gathered indicating an HMA is determined to be over the established AML, the Bureau of Land Management (BLM) shall request the budget to remove the excess wild horses to reduce that HMA back to AML. It is imperative this information be disclosed in the EA and adhered to.

We support the need for monitoring of the proposed action as stated in Section 6.0, but believe the need for monitoring the range resources should also be an important part of this action. Due to the potential deterioration of the range resource caused by wild horse over-populations in Wyoming, there is a need for more comprehensive annual monitoring specifically addressing the impacts of wild horses as one of the multiple uses on our public lands. Based on the results of monitoring, HMA AMLs can then be adjusted as needed in order to maintain the "thriving natural ecological balance" required by the Wild free-Roaming Horse and Burro Act of 1971. The WDA would ask BLM work with affected state and local agencies, landowners and livestock grazing permittees in implementing a comprehensive monitoring program that ties in with this action.

We support the BLM decision to not choose the 'No Action' alternative. The degradation of the herd management area is inevitable when the wild horse population is allowed to expand beyond the AML. To make 'no progress toward meeting rangeland health standards...' as stated would be the case in the no action alternative is not acceptable.

We appreciate the opportunity to comment on the EA for the proposed implementation of a fertility control field darting program for the McCullough Peaks Herd Management Area. We look forward to decisions 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
Wyoming Farm Bureau Federation
State Grazing Board
Wyoming Association of Conservation Districts