



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

March 19, 2012

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

Dear Mr. Fluer,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for gathering of wild horses in the North Lander Complex; consisting of the Muskrat Basin, Rock Creek Mountain, Conant Creek and Dishpan Butte Herd Management Areas (HMA) located within the Lander Field Office (LFO).

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 supports the removal of wild horse to the lower limit of Appropriate Management Levels (AML) within the HMAs along with the removal of all wild horses located outside HMAs. We encourage the Bureau of Land Management (BLM) continue to meet the direction and guidelines set forth in the 2003 Consent Decree between the State of Wyoming and the U.S. Department of Interior, and insist the Consent Decree be referenced in the NEPA document.

We also encourage the BLM to identify, analyze and implement all tools available in controlling wild horse populations within the North Lander Complex. This includes; removing wild horses within the HMAs and from adjacent lands outside of the HMAs; adjusting the sex ratio of remaining wild horses to a 60:40 sex ratio favoring stallions; treating all mares released with immunocontraceptive Porcine Zona Pellucida-22 (PZP); geld all mustangs or a portion of the mustangs released back into the HMAs; identify and spay mares of a certain age class that are to be released back into the HMAs. All these tools should be considered and analyzed in whole or combined to develop various alternatives in the National Environmental Policy Act (NEPA) document.

Special considerations and management prescriptions needs to take place when evaluating wild horses and how they may directly impact species of concern, like sage grouse. The North Lander Complex HMAs are located within the sage grouse core area and the NEPA document should reference the Wyoming Executive Order 2011-05. In order to protect rangeland resources and critical sage grouse habitats, wild horse management needs to be aggressively managed, more so than areas located outside sage grouse core areas. Other resources, such as livestock grazing and livestock grazing management are used as mitigation for managing sage grouse habitats, while wild horse and wildlife are not. Turning a blind eye toward the effects wild horses have on rangeland resources is unacceptable. Wild horse movements and forage utilization are not managed, only their numbers. Wild horse management within sage grouse core areas needs to change with the change in management for sage grouse. The WDA insists the BLM fully analyze the impacts wild horses are having upon sage grouse and sage grouse habitats, and identify the changes in management and mitigation measures that will occur in the NEPA document.

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With this said, wild horses are also playing a larger role on impacting rangeland resources. Last year in the LFO - Arapahoe Creek Allotment; a pasture was determined to have met its forage utilization levels prior to the introduction of livestock grazing. Wild horses were determined to be the cause by BLM staff. Livestock grazing producers were not allowed to utilize the pasture or the State Land leases located within the pasture due to wild horse use. This situation placed undue hardships on livestock grazing producers, who were faced with approximately one month reduction in season of use and were forced to adaptively locate other areas to graze. This recent example of wild horses impacting forage use, rangeland health, livestock permittees livelihoods and sage grouse habitat must be considered and analyzed as an effect in this NEPA document. In addition, the WDA insists that if this occurs in the future, this activity should automatically trigger the BLM to adaptively manage the wild horse herd and immediately begin the wild horse removal process.

Because wild horses are located both within the HMAs and in areas adjacent to the HMAs, it is crucial BLM staff work closely and proactively with landowners/permittees in the HMA and surrounding areas. It is important to utilize the knowledge of the landowners/permittees to identify locations of wild horses at the time of gather. In addition, these landowners/permittees may know where wild horses have created negative impacts on rangeland health. We encourage the BLM seek this information to be utilized in the NEPA document.

We appreciate the opportunity to comment on this Scoping Notice. We encourage continued attention to our concerns and look forward to providing valuable comments on a Draft NEPA document.

Sincerely,



FOR

Jason Fearneyhough
Director

JF/cw

CC: Governor's Policy Office
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department

Wyoming State Grazing Board
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