



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

August 14, 2009

Jim Sparks, Field Manager
Bureau of Land Management – Billings Field Office
5001 Southgate Drive
Billings, MT 59101

Dear Mr. Sparks:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Pryor Mountain Wild Horse Range 2009 Draft Gather and Population Management Plan and Preliminary Environmental Assessment (PMWHR EA).

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.

The WDA supports the proposed action to gather wild horses and utilize a fertility control vaccine in the Pryor Mountain Wild Horse Range (PMWHR). We commend the Bureau of Land Management (BLM) for their development of a proposed action that includes removing excess horses from the PMWHR and adjacent lands, balancing the sex ratios, preserving bloodlines and rare colors, 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 gathering of wild horses is in conformance with the Billings Resource Management Plan Final EIS (1984) Record of Decision objectives "to manage for a balance between a healthy population of wild horses and improvements in range condition, wildlife habitat, and watershed condition." The new Pryor Mountain Wild Horse Range Herd Management Plan (MT-010-08-24 May 2009) decision sets the AML to 90 to 120 wild horses excluding current years foal crop. The evaluation done during this analysis "affirmed that the existing AML of 85-105 horses is still appropriate." The March and April 2009 aerial census of horses shows more than double the AML lower limit. The BLM must adhere to the AML to continue sustainable lands with the consideration of preserving multiple use relationships.

It was noted that "populations of wild horses in excess of established AML are negatively affecting the rangeland resources."¹ As noted, there has been a shift toward a downward trend in ecological condition with documented heavy forage utilization. We would urge the BLM to continue monitoring and adjust the herd number within the range of the AML to insure an ecological balance.

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We support the continuation of wild horses only being managed on areas of public lands where they were known to exist at the time of the passage of the Wild Free-Roaming Horse and Burros Act in 1971. We do not support range expansion in Wyoming for wild horses or burros. We support the removal of the 39 wild horses that are perpetually residing outside the PMWHR. If any of these wild horses are released, they will return to their familiar range and have the potential of taking more released wild horses with them.

Wild horses lack the pressure of hunting and predation and are limited only by forage and water resources. The implementation of the Porcine Zona Pellucida (PZP) pellet is an important tool to use to slow the population growth of wild horses or burros throughout the West, including Wyoming and Montana.

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 PMWHR Draft Gather and Population Management Plan and Preliminary EA. We look forward to the proposed action and 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

JF/lb

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

¹ Record of Decision for the Pryor Mountain Wild Horse Range 2008 Gather Plan and Environmental Assessment. September 2008. U.S. Department of the Interior, Bureau of Land Management.