



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

March 28, 2011

Scott Fluer, Wild Horse and Burro Specialist
BLM, Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Mr. Fluer:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to gather wild horses from the Red Desert Complex (Antelope Hills, Crooks Mountain, Green Mountain, Stewart Creek and Lost Creek Wild Horse Management Areas (HMAs) as a maintenance 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.

The WDA supports the continued work of the BLM to manage wild horse populations in the State of Wyoming, while providing for the protection of rangeland resources. We strongly support the proposed management action to gather wild horses from the Red Desert Complex and surrounding area; treat all mares released with Immunocontraceptive Porcine Zona Pellucida-22 (PZP-22); gather all horses residing outside the HMAs and remove them from the range; and remove all the foals from the range. We wish to stress the importance of ongoing, active management measures to maintain HMA populations within the established Appropriate Management Levels (AMLs). We find the proposed management action in conformance with the Rawlins Resource Management Plan, the Great Divide Resource Area Wild Horse Herd Management Area Evaluation, Lander Resource Management Plan and the Lander Herd Management Area Plan.

This action is imperative in:

- maintaining wild horse populations within each HMA's AML;
- maintaining the integrity of approved HMA boundaries through removing wild horses outside these boundaries; and
- following the new federal guidance to slow population growth with the use of fertility control in mares.

We request the Environmental Assessment (EA) reference the Consent Decree dated August 14, 2003, between the State of Wyoming and U.S. Department of Interior Bureau of Land Management (BLM). Within the Consent Decree, the BLM agrees to perform an inventory of HMAs every three years to reduce the population of wild free-roaming horses to AML. We insist the EA analysis include language stating the wild horse population remaining on the range after the implementation of the action is within the range identified by each HMA's AML.

Population surveys conducted in August 2010 revealed approximately 827 horses within this HMA – 225 over the mid-range of the established AML for this HMA. Additionally, there were 370 outside the approved HMA boundaries and the WDA insists BLM remove these horses from the range.

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The WDA supports removing all foals at the time of the gather and suggests the definition of foal be applied liberally to foals born in 2010 and 2011. Per the direction from the National Program to increase the number of wild horse adoptions, these foals are more adoptable than other classes of wild horses. The terms identified in the EA must specifically provide BLM flexibility to remove as many wild horses as necessary to achieve AML in these HMAs. Although this action is intended as a maintenance action, the WDA suggests including language in the EA allowing the latitude for additional wild horses to be removed based upon the on-the-ground reality as it presents itself at the time of EA implementation. This provides for budget and time efficiencies and works toward the goal of extending the time period before another gather to remove excess wild horses is required.

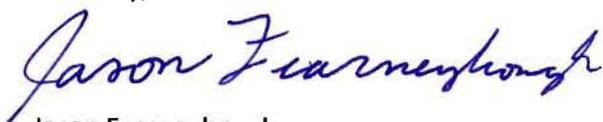
We support the use of fertility control vaccine during the gather. Administering the PZP-22 to mares has the potential to slow population growth and extend the time period before another gather to remove excess wild horses. Although we support this action, we want to stress the importance of continued census counts to manage populations and not rely on the unproven effectiveness of PZP-22controlling wild horse populations in Wyoming HMAs. We also ask for BLM's continued attention to timely removal of horses moving outside the defined HMA boundaries in future years.

With 54,227 non-BLM acres included in these 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 landowners/permittees to identify locations of horses at gather time, in addition to where these wild horses cause negative impacts on the natural ecological balance of the range.

The WDA works closely with the Wyoming conservation districts to conserve and protect the quality of life for the citizens of the state. We strongly encourage the BLM work closely with the local conservation districts and consider their comments in your analysis and the development of the EA.

We appreciate the opportunity to comment on the scope of the proposed management action. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/lis

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

Wyoming State Grazing Board
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