



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

December 20, 2019

Rock Springs Field Office  
Bureau of Land Management  
280 Highway 191 North  
Rock Springs, WY 82901

Re: Multi-Year Wild Horse Gather

Rock Springs Field Office (RSFO),

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for a Multi-Year Wild Horse Gather (Project) on Adobe Town, Great Divide Basin, Salt Wells Creek, Little Colorado and White Mountain Herd Management Areas (HMAs).

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.

We support the gather and removal of wild horses in the proposed HMAs to reduce the populations to low Appropriate Management Levels. In addition, we strongly encourage the BLM to ensure that all wild horses outside/adjacent to the various HMAs are gathered and removed during these efforts. The overpopulation of wild horses results in direct and indirect negative impacts to wildlife populations and their habitats, along with competition for forage and water with both wildlife and livestock.

The WDA supports the concept of approving a multi-year gather of the various HMAs identified, however, we do not support the open ended nature of the proposal. Currently, the proposal does not identify which HMAs would be gathered in 2020 and beyond. We would propose the BLM should remove all wild horses located on Rock Springs Grazing Association's (RSGA) private lands and Wyoming's Checkerboard lands in accordance with the U.S. District Court ordered Consent Decree (dated April 3, 2013) with the RSGA as soon as possible, since the BLM has not been in compliance with the Court Order for the last several years. In addition, we would encourage the BLM to schedule the remaining HMAs, so there is a definitive idea when the HMAs would be gathered.

We support the following components of the Alternatives:

- Gather and remove excess wild horses down to low AML
- Apply PZP to mares released back into the HMA
- Apply Gonna Con fertility control vaccine to mares released back into the HMA
- Establish a 60% to 40% male to female ratio within the HMA
- Spay a group of mares and studs released back into the HMA, and apply PZP or Gonna Con to remaining mares.

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We support the BLM analyzing and implementing a full range of potential fertility and sterilization control measures. However, the proposal only offers separate alternatives addressing distinct potential uses of fertility control, and does not look at them as separate tools in a tool box. We encourage the BLM to analyze all the fertility control measures and select all the potential fertility control options identified in the various alternatives to allow for a variety of different treatments and treatment options based on the needs and desired outcomes for each HMA.

We do not support the No Action (no gather/no treatment) Alternative or a gather with no fertility control treatment applied to wild horses returned to the HMAs.

It is also 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 negative impacts on rangeland and rangeland health.

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,



Doug Miyamoto  
Director

DM/cw

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

Wyoming State Grazing Board  
Wyoming Stock Growers  
Wyoming Wool Growers  
Wyoming Board of Agriculture