



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

April 16, 2026

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Bureau of Land Management
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Field Manager
Bureau of Land Management
Rawlins Field Office
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Rawlins, WY 82301

Dear Ms. Miller and Mr. Novotny,

Following are the Wyoming Department of Agriculture (WDA) Scoping Notice comments regarding the Bureau of Land Management (BLM), Lander Field Office (LFO) and Rawlins Field Office (RFO) to prepare an Environmental Assessment (EA) for the proposed updates to Herd Management Area Plans (HMAP) for the Antelope Hills, Crooks Mountain, Green Mountain, Lost Creek, and Stewart Creek herd management areas (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 could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA supports the BLM's efforts to develop an EA to gather wild horses in the five HMAs. The estimated population of 2,300 wild horses is nearly five times the lower appropriate management level (AML). WDA recommends the BLM develop two alternatives: No Action and Proposed Action. We recommend analyzing the Proposed Action for the following issues of concern:

- Gather to low AML
- Utilize Fertility Control
- Develop comprehensive gather options
- Analyze impacts on sage-grouse
- Analyze impacts to livestock grazing permits

Gather to low AML:

The Scoping Notice indicates the AML for the complex is between 480 and 724 wild horses. We strongly urge the EA to analyze the gather to low AML, given wild horses populations typically increase by 20% per year. It is imperative to

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provide the BLM the authority to reduce to low AML and reduce the immediate need to initiate another gather in the next couple of years.

WDA requests the BLM gather in mid-to-late Fall. Conducting the gather during this window ensures foals are naturally weaned, allowing the BLM to include them in the removal count rather than releasing them into the HMA with their dam.

Utilize Fertility Control:

WDA supports the use of Intrauterine Devices (IUDs) and injecting GonaCon-Equine for mares released back into the HMAs. However, since IUDs can only be inserted into open mares (non-pregnant) mares and most mares are rebred within 6 to 30 days after foaling, we recommend the EA analyze how BLM will address this limitation. Specifically, the EA should evaluate strategies to increase IUD implementation, such as re-gathering wild horses within 18 to 24 months of a GonaCon-equine injection. This timeline would ensure a higher percentage of mares are open and eligible for IUD insertion.

The EA should analyze additional fertility control methods, including emerging vaccine formulations, as well as permanent sterilization through mare spaying and stallion gelding. WDA supports the BLM's mission to maintain "self-sustaining, healthy population of wild horses on public lands;" however, we contend that achieving this intent does not require every individual horse within the HMA to retain breeding capability.

Develop comprehensive gather options:

WDA urges the BLM to analyze all potential gather methods within the EA to ensure a comprehensive range of alternatives. This should include both helicopter assisted and bait trapping operations. Incorporating bait traps would allow for maintenance gathers throughout the life of the EA to keep the population at the low AML, preventing the cyclical pattern of allowing wild horses populations from becoming exceedingly high. We advocate for an EA with long-term viability that allows the BLM to tier back to this decision for future management actions as needed.

Analyze utilization of upland and riparian vegetation by wild horses:

The EA should incorporate a Land Health Assessment to evaluate current conditions of upland and riparian vegetation and determine if wild horse overpopulations is the causal factor for not meeting Rangeland Health Standards. Utilization of vegetation by wild horses occurs year-round and likely reduces forage availability for livestock and wildlife.

Analyze impacts on sage-grouse:

There are three Management Actions found in the 2025 Wyoming Greater Sage-grouse Record of Decision (ROD) the BLM must incorporate in the EA analysis:

- 1) Management Action 1: "Where wild horses and burros overlap with GRSG:
 - a. Manage wild horse and burro populations within established Appropriate Management Levels (AML) **AND**
 - b. Incorporate GRSG habitat objectives into wild horse and burro management (e.g. herd management area plans, AML) monitoring, and gather prioritization, with prioritization of such activities in PHMA, then GHMA."
- 2) Management Action 2: "Manage wild horse and burros herd management areas in GRSG habitat (or portions of the herd management area overlapping or within GRSG habitat) within the established AML ranges to achieve and maintain GRSG habitat objectives and achieve or make significant progress toward achieving LHS, considering the full suite of approaches to maintain AML, including temporary fertility control and non-reproducing or partially non-reproducing herds. "

3) Management Action 3: "If GRSG site-scale habitat objectives are not being met in PHMA and GHMA, evaluate AMLs and adjust, if necessary through the NEPA process where wild horse or burro use is identified as significant causal factor to not meeting LHS, or is a factor in the area not meeting the GRSG habitat objectives." WDA urges the BLM to closely follow the GRSG ROD as many of the previously mentioned recommendations for the EA analysis are reiterated in these three management actions.

Analyze impacts to livestock grazing permits:

Excess wild horses can have significant negative impacts to livestock grazing permits. Because wild horses are present year-round, it is often difficult to differentiate the utilization levels of upland and riparian vegetation between wild horses and livestock. Additionally, wild horses can degrade range improvement projects by damaging fences, depleting limited water in stock tanks, or obstructing livestock access to water sources. WDA encourages BLM to comprehensively analyze the impacts of wild horses above AML on the viability of livestock grazing permits.

We appreciate the opportunity to provide Scoping comments on this project and look forward to working with your staff in the near future. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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