



Wyoming  
DEPARTMENT OF *Agriculture*

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

January 14, 2016

Tim Wakefield, District Manager  
Kimberlee Foster, Field Office Manager  
Jay D'Ewart, Wild Horse Specialist  
Rock Springs Field Office  
Bureau of Land Management  
280 Highway 191 North  
Rock Springs, WY 82901

Dear Mr. D'Ewart,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the proposed White Mountain and Little Colorado Population wild horse Management Action Project (Project) located within the Rock Springs Field Office (RSFO).

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 recognizes the importance of managing wild horses within the RSFO and adjacent lands, and insists Bureau of Land Management (BLM) actively manage wild horses to ensure an ecological balance exists between wild horse populations, wildlife, livestock, and healthy rangelands.

The WDA appreciates the BLM proposing to perform an actual field study of spaying wild horses on the range. However, we strongly suggest BLM gather both the White Mountain and Little Colorado Herd Management Areas (HMA) down to low Appropriate Management Levels (AML) prior to beginning the Project. The current RSFO Resource Management Plan and the 2013 Court Approved Consent Decree between Rock Springs Grazing Association and the BLM (April 3, 2013) states BLM will remove excess wild horses to established AML levels. Based on the scoping document White Mountain is at approximately 386 wild horses within the HMA and has an established AML between 205-300 wild horses. The Little Colorado is at approximately 475 wild horses within the HMA and has an established AML between 69-100, which is 400% over high AML. Considering wild horses already are exceeding AML at the beginning of the Project, we assume wild horses are causing damage to valuable resources (vegetative resource, wildlife resources, and sage grouse) and impacting the "Thriving Natural Ecological Balance" of the range.

The WDA supports the Project to study permanent fertility control in the wild, but we cannot support having each of these HMAs existing above the established AMLs for the duration of the study.

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In addition, we are concerned the Project is only looking at spaying an undisclosed number of mares. This provides us no certainty the BLM will manage and keep wild horse populations at or below AML. We strongly encourage the BLM consider using SpayVAC or other fertility control methods in conjunction with the spaying of wild horses. The goal for the White Mountain HMA was to manage for a non-reproducing herd. The study does not go far enough to achieving this goal.

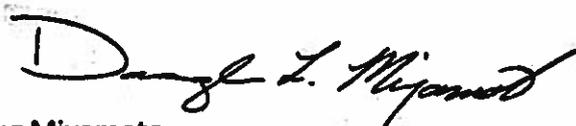
Another component the proposed Project neglects to address; is to incorporate a thorough monitoring component to the study. This is an opportune time to collect valuable data to document how wild horses impact the health of the rangelands and rangeland conditions, wildlife and wildlife habitats, including sage grouse and their habitats, and important wildlife migration corridors. The majority of both HMAs are located in Core/Priority sage grouse habitats which must be analyzed.

WDA insists BLM remove all wild horses from lands adjacent to the two HMAs. The scoping document only suggests gathering wild horses located within the HMAs. We also encourage BLM staff committing to working closely with private landowners/permittees within the HMAs and the adjacent areas to ensure livestock grazing operations are not impacted during the gathers or during the Project. We especially encourage full coordination with the Rock Springs Grazing Association and to fully comply with the 2013 court approved Consent Decree.

Finally, the WDA asks for Cooperating Agency status in the proposed Project, this includes participating in ID-team meeting, NEPA analysis and development of alternatives. The State of Wyoming and BLM have an approved Memorandum of Agreement (BLM-MOU-WY-930-1501) that ensures the WDA and other state agencies have this opportunity.

We appreciate the opportunity to comment on the EA. We strongly encourage BLM to gather and remove wild horses from the RSFO and adjacent areas as soon as possible, so no further impacts are created to important wildlife and vegetative resources in the area.

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