



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.*

March 31, 2010

Melanie Gilbert, Wild Horse and Burro Specialist  
BLM, Rawlins Field Office Bureau of Land Management  
1300 N. Third Street  
Rawlins, WY 82301

Dear Ms. Gilbert:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to gather wild horses in the Adobe Town & Salt Wells Creek Horse Management Areas (HMAs) as a population management 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 proposed management action to gather wild horses in the Adobe Town HMA and Salt Wells Creek HMA. The gathering of wild horses in these HMAs is essential to achieve the management objects for wild horses.

We support the continued work of the BLM to manage wild horse populations in the State of Wyoming, while providing for the protection of rangeland resources. The gathering of wild horses is in conformance with the Rawlins RMP, Great Divide Resource Area Wild Horse Herd Management Area Evaluation and the Green River RMP and provides for the continuation of healthy viable populations of wild horses on public lands for future generations to view.

We strongly support the continued reference of the Consent Decree dated August 14, 2003, between the State of Wyoming and U.S. Department of Interior and the Bureau of Land Management (BLM) in the Environmental Analysis (EA) for the proposed action. Within the Consent Decree, the BLM agrees to perform an inventory of the HMAs every three years to reduce the population of wild free-roaming horses and burros to the lower end of the AML. The most recent population surveys conducted revealed approximately 1,950 horses within these two adjacent HMAs which is nearly double the AMLs for the HMAs. We insist that the EA analysis include language stating that the wild horse population will be reduced to the lower end of the AML during the gather.

We encourage you to utilize a fertility control vaccine in the areas during the gather. We believe including the use of Immunocontraceptive Porcine Zona Pellucida (PZP) helps in the management of wild horses in the HMAs. Unlike wildlife, wild horses lack the pressure of hunting and predation. Populations are limited only by forage, water, and human intervention. The implementation of the PZP vaccination will be an important tool to use to slow the population growth of wild horses or burros throughout the West, including Wyoming.

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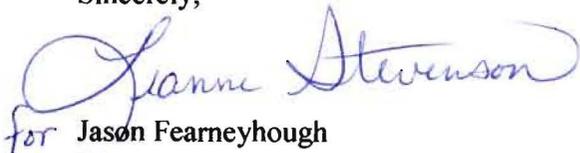
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We encourage BLM staff to work closely and proactively with landowners /permittees in the two HMAs and surrounding areas. Since a large portion of the area in these HMAs is under checkerboard land pattern ownership, the wild horse overpopulation impacts are more critical to private landowners. It is important to utilize the knowledge of these landowners/permittees to identify the location of horses at the time of the gather, in addition to where these wild horses cause negative impacts on the natural ecological balance of the range.

The WDA works closely with the conservation districts in the state in conserving and protecting 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,



for 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  
State Grazing Board  
Wyoming Association of Conservation Districts  
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