



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

January 12, 2015

Attn: Grazing Renewal FY15  
BLM Kemmerer Field Office  
430 North Highway 189  
Kemmerer, WY 83101

Dear Mr. Mier,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bureau of Land Management (BLM) Kemmerer Field Office (KFO) to issue new term grazing permits on eight allotments (Airport, Beaver Creek, East Willow Creek, West Willow Creek, North Moyer, South Moyer, Quealy Peak, and Twin Creek).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe 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.

We appreciate KFO including the WDA in the scoping of the eight allotments. We support KFO's approach to develop three Environmental Analysis (EA): 1) Airport, East Willow Creek, West Willow Creek, North Moyer, South Moyer and Quealy, 2) Beaver Creek and 3) Twin Creek.

We ask KFO to ensure each permit indicates Active, Suspended, and Permitted Animal Unit Months (AUMs). After assessing each allotment for conformance with Wyoming Standards for Healthy Rangelands, we ask KFO to also consider reissuing Suspended AUMs for those allotments meeting standards. KFO should evaluate active and permitted stocking rates to ensure appropriate grazing management levels. WDA strongly recommends KFO include stocking rate calculations and determinations in each EA.

The Natural Resources Conservation Service's Ecological Site Description database is useful for not only evaluating current vegetative ecological sites, but also stocking rates. In ecological sites where vegetation standards are not met, KFO should include appropriate range improvement projects or vegetation treatments in the EA. WDA also recommends the development of achievable and appropriate objectives for each of the six standards.

WDA recommends KFO review two recent appeals:

- 1) Appeal of Final Decision for the Boulder Landscape Plan and Allotments: Western Watersheds Project v. Pinedale Field Office, August 12, 2014.
- 2) Appeal of Final Decision for the James Ryegrass, Ball Horse Creek and Webb Draw Allotments: Western Watersheds Project v. Pinedale Field Office, July 28, 2014.

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WDA respectfully requests KFO utilize GPS points on all joint cooperative monitoring cages not only on the eight allotments, but on all allotments across the field office. We recommend removing any and all monitoring cages not currently utilized, or not approved by the KFO. We are aware of a number of third-party monitoring cages placed on grazing allotments on BLM and US Forest Service without prior approval by the agency. We strongly believe monitoring cages placed on BLM lands without prior approval by the authorized officer is against BLM regulations and should be considered trespass. Data collected from these cages often does not follow approved agency protocol or manuals.

We understand there is interest in a conversion from cattle to sheep on Beaver Creek. While we fully support KFO analyzing this conversion, we ask KFO work closely with all grazing permittees to consider analyzing and issuing permitted AUMs with both cattle and sheep. We are aware of a number of permits issued with this change and both the agency and permittees are experiencing great success. This allows flexibility for future adaptive management actions by the agency, as well as allowing the livestock operators to capitalize on current livestock markets, and adjust stocking rates to meet vegetation objectives.

We appreciate KFO accepting our comments and look forward to working closely with you throughout the development of the three EAs. If you have any questions, please contact Justin Williams at 307.777.7067.

Sincerely,



Chris Wichmann  
Manager, Natural Resources & Policy Division

CW/jw

CC: Governor's Policy Office  
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