



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

October 14, 2015

Mrs. Holly Elliott, Planning & Environmental Specialist
Bureau of Land Management
Worland Field Office
101 South 23rd Street
Worland, WY 82401

Dear Mrs. Elliott,

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the Bureau of Land Management (BLM) Worland Field Office's (WFO) request for public input on the East Cottonwood (#00534), West Cottonwood (#00535), Coal Draw (#00574), Wagonhound (#00596), and Wagonhound Bench (#00573) allotments.

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 issuance of grazing permits for the allotments.

The BLM should consider the following issues: appropriate number of Animal Unit Months (AUMs) and carrying capacity, type of livestock, class of livestock, needed infrastructure or repair/improvement (e.g., water, fencing, etc.), season of use, available scientific information and validity (e.g., Ecological Site Descriptions (ESDs), Rangeland Health Assessment data, etc.) and goals and objectives for each allotment (e.g., wildlife, habitat, forage, etc.).

The BLM must establish realistic and obtainable goals for each allotment. Current and accurate ESDs should be used to inform the process and ascertain site capability, ESD state, and desired plant communities. The BLM should also determine if there are anomalies in the allotments that may influence site capability, forage production, or forage utilization. Data for the analysis should be specific enough to adequately describe the current conditions and influences on the allotments.

Some of the allotments overlap sage-grouse Core Areas as defined by Wyoming Executive Order 2015-04 and/or Priority Habitat Management Areas as defined by the Worland Approved Resource Management Plan (ARMP). The BLM should complete the final steps (3rd and 4th Order Selection) of the Habitat Assessment Framework tool as described by Stiver et al. when considering any guidelines related to sage-grouse.¹

¹ Technical Reference 6710-1. Stiver, S., E.T. Rinkes, D.E. Naugle, P.D. Makela, D.A. Nance, J.W. Karl. *Sage-Grouse Habitat Assessment Framework: A Multiscale Assessment Tool*. 2015.

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The ARMP states livestock grazing will be used *"as a tool to maintain or improve resource conditions"*.² The WDA supports the use of livestock as a management tool and asks that the BLM explore every possible scenario to utilize livestock grazing management to improve the landscape and help the BLM achieve their multiple resource use mission. Additionally, the BLM should analyze current range improvements and infrastructure and determine where opportunities exist to enhance water sources or to restructure pastures within the allotments if needed, as outlined in the ARMP.³

The WDA previously provided funds for the allotments under the Rangeland Health Assessment Program (RHAP). We recommend the BLM use any pertinent data from the program to better inform the analysis. Additionally, the ARMP states the BLM will *"In cooperation, consultation, and coordination with permittees/lessees, cooperators, and interested public, develop and implement appropriate livestock grazing management actions to enhance land health, improve forage for livestock, and meet other multiple use objectives..."*.⁴ The WDA supports the cooperative nature of this statement and hopes the BLM will honor this throughout the process.

The WDA remains wary of any proposed sage-grouse desired conditions due to the lack of clear direction regarding implementation of the ARMP. Please keep us informed of any appeals or protests.

In conclusion, we thank you for the opportunity to comment and look forward to working with you in the future.

Sincerely,


Doug Miyamoto
Director

DM/jb

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

Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association

² Worland Approved RMP, Chapter 3, Record #6206, pg. 127.

³ Worland Approved RMP, Chapter 3, Record #6212, pg. 128.

⁴ Worland Approved RMP, Chapter 3, Record #6198, pg. 126.