



Wyoming
DEPARTMENT OF *Agriculture*

Matthew H. Mead, *Governor*
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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.

December 30, 2014

Bureau of Land Management
Rock Springs Field Office
Attn: Lacey Anderson
280 Highway 191 North
Rock Springs, WY 82901-3447

Dear Ms. Anderson,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Bureau of Land Management (BLM) Rock Springs Field Office (RSFO) to renew the permit for Alakali Creek Allotment and to transfer grazing preference from Raftopoulos Brothers to Two Bar Sheep Company LLC.

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 project 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.

WDA is in support of RSFO renewing the permit for Alkali Creek Allotment, as well as the transfer from Raftopoulos Brothers to Two Bar Sheep Company.

We ask for specific clarification regarding the following:

- Ensure clarity between the Animal Unit Months (AUMs) for the transfer, as there is a 20 day difference, as well as a 167 animal head difference between the permit transfer.
- Table 1 shows Active, Suspended, and Permitted Use (Total) AUMs. However, Tables 4 and 5, lack Suspended or Permitted AUMs. We urge RSFO ensures the new permits specifically include Active, Suspended, and Permitted AUMs.
- The Rangeland Health Assessment (RHA) for this allotment is in conformance. We believe RSFO should utilize all monitoring data to assess and consider reinstating Suspended AUMs when and where appropriate based on the RHA.
- Two Bar Sheep terms and conditions includes AUM use for trailing. We ask RSFO provide more information regarding the change in use between Raftopoulos Brothers and Two Bar Sheep.
- The term and condition for health and brand inspection applies to both cattle and sheep permits, however, only the Two Bar Sheep has this as a term and condition of the permit.

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WDA appreciates RSFO efforts to support on-going livestock grazing in the Alkali Creek Allotment. Please include us in the future development and analysis of the Environmental Analysis. If you have any questions, please contact Justin Williams at 307-777-7067.

Sincerely,


for Jason Fearneyhough
Director

JF/jw

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