



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

December 31, 2013

BLM Pinedale Field Office
1625 W Pine St.
P.O. Box 768
Pinedale, WY 82941

To Whom It May Concern:

Following are the comments of the Wyoming Department of Agriculture (WDA) pertaining to the Bureau of Land Management (BLM) –Pinedale Field Office request for comments on the Scoping Notice for developing alternatives on an Environmental Assessment (EA) for renewing grazing permits for the James Ryegrass Grazing Association and the Robert L. McNeel Living Trust.

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.

We appreciate the opportunity to provide scoping comments for the James Ryegrass and McNeel Living Trust allotments (Allotments). WDA strongly supports the continuance of commercial livestock grazing. We offer the following comments for the BLM to consider when developing the EA.

The BLM neglects to include the information or data pertaining for Webb Draw failing to meet the riparian standard and if livestock are in-fact the causal factor. According to the Standards for Healthy Rangelands & Guidelines for Livestock Grazing Management for the Public Lands Administration by the BLM in the State of Wyoming, *"When an allotment's condition fails to meet one or more of the standards, and livestock grazing is a contributing factor to that failure, then a determination must be made that existing grazing management needs to be modified. This determination must be supported by monitoring, field observations, ecological site inventory, or other data acceptable to the BLM office manager. If field observations are used, the observations must be well documented, and where possible, supported by photographs, weather records, or other supporting evidence."*

WDA strongly urges BLM to invite affected grazing permittees to all field monitoring and rangeland health assessments. We understand the permittees were unbeknownst to BLM's interdisciplinary review evaluating the allotments for the rangeland health assessment, specifically in determining Webb Draw as not meeting standard number two. Again, according to the Guidelines for Livestock Grazing document, *"Ideally, reviews will be conducted in an interdisciplinary manner. Permittees, lessees, State agency*

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representatives, and interested publics will be invited to accompany Bureau personnel in the field, attend meetings, and provide input into the review process.” The WDA as a Cooperating Agency and interested party is interested in all monitoring and assessments of the Allotments. We request the permittees and WDA are included in all future activities.

The WDA would also like the NEPA analysis to include the socio and economic importance livestock grazing and ranching has on the local economy, but also to the protection of open space and wildlife habitats (Yarbrough et al. 2006¹). We believe any changes to grazing management should be based on a site-specific basis utilizing scientific data.

BLM is proposing vegetation treatments for the benefit of mule deer in the Pinedale Field Office. Some of these treatments overlap with the proposed Allotments. Due to the timing of both EAs, WDA insists the permit renewal for these Allotments is in no way hindered by the projected vegetation treatments.

WDA appreciates the opportunity to provide scoping comments for these Allotments. We ask BLM to include us in all future meetings for alternative developments, as well as field tours and data collection. WDA would appreciate BLM providing appropriate and adequate notification for commenting, attending meetings, and attending field tours.

If you have further questions, please feel free to contact us.

Sincerely,


JBF
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
Wyoming Game and Fish Department

¹ Yarbrough, A., J. Kapela, and C. O'Brady. 2006. Ranching in the Rockies, Threats and Signs of Hope. The 2006 Colorado College State of the Rockies Report Card. 6 pages. <http://www.coloradocollege.edu/StateoftheRockies/06ReportCard/21-26%20Ranching%20in%20the%20Rockies.pdf>.