



Wyoming  
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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.*

February 12, 2014

Pinedale Bureau of Land Management Field Office  
1625 West Pine Street  
PO Box 768  
Pinedale, WY 82941-0768

Dear Kellie,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Pinedale Bureau of Land Management Field Office's ( Pinedale BLM) Environmental Assessment (EA) proposing to continue commercial livestock grazing and develop and implement a travel management plan for the Boulder Landscape.

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, including appeals and resolutions, as well as continue to provide us the opportunity to express pertinent issues and concerns.

The WDA supports Pinedale BLM's concept of streamlining the permit renewal process to include multiple allotments. In general, the EA analyzes a range of reasonable alternatives, which are a reflection of previous meetings between permittees and BLM. However, WDA is disappointed the BLM neglected to include most of our comments from the draft EA November 2013, or the comments we submitted by e-mail on December 27, 2013. We are also very concerned the Boulder Landscape Plan does not meet the bar for a programmatic approach or as a template for future permit renewals in the Pinedale BLM office. We offer the following comments and concerns regarding the EA's alternatives and analysis:

We strongly encourage Pinedale BLM clarify where in this process they will cooperatively develop a viable Allotment Management Plan, inclusive of the permits and the permittees' ranch plan. Additionally, we ask the Pinedale BLM consider identifying proposed range improvement projects and include these in the analysis. The EA states on page 33, under "*Chalk Butte Common Allotment*, "*Several requests have been made over the years to develop water in the southeast part of the allotment.*" This statement causes us great concern and wonder how many other permittees have identified needs for additional range improvement projects, but have yet to have the projects analyzed and implemented.

*Equal Opportunity in Employment and Services*

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The WDA provided scoping comments for the EA, which are included in Appendix I. However, the Pinedale BLM neglected to include our comment on page 2, section 1.3 “Relationship to Statutes, Regulations or other Environmental Analyses.” Our original comment stated ““...management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing, needs to be specifically noted in the environmental document. FLPMA Sec. 102(8) states “The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals...””

In addition to FLPMA, WDA urges the BLM to reference and utilize Wyoming Governor Executive Order 2011-5, Attachment C-Exempt (“de minimus”) Activities, and 2013-3. Executive Order 2013-3 specifically addresses Greater Sage-grouse Core Area and Grazing Adjustments.

Page 7 – 8:

The WDA does not support “range readiness criteria” at an allotment or at a landscape scale. WDA understood Pinedale BLM borrowed the “range readiness criteria” language from the Cody BLM Field Office, which was only intended for drought preparation in 2013. WDA worked closely with Pinedale BLM to understand the reasoning for requiring all allotments in the Boulder Landscape, and possibly throughout the Pinedale Field Office requiring annual range readiness criteria. We were disappointed to see the range readiness criteria was not withdrawn from this draft or applied only to persistent drought conditions, but was actually changed from a 4” height requirement on bunch grasses in the draft EA, to an even narrower requirement.

Page 8 states: “*Turn-in dates on the more productive sites such as loamy, shallow loamy and sandy range sites will be allowed when active new vegetative growth reaches an average leaf length of four to six inches and/or fourth leaf stage in the primary livestock use areas on key bunchgrasses.*”

The following paragraph states: “*Turn-in dates on lower productive sites, such as shallow clay range sites will be allowed when an active new vegetative growth reaches an average leaf length of two to four inches and/or the fourth leaf stage in the primary livestock use areas on key species.*”

WDA provided the following language on December 27, 2013, which includes direct language from Federal Regulations, Instructional Memorandums, and the Pinedale RMP. We believe Pinedale BLM should refrain from including any range readiness criteria, but instead work individually with permittees to address each allotment during the spring turn-out meetings. We strongly urge Pinedale BLM replace the above mentioned language with the following:

“Provision for livestock grazing to be temporarily delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the

improvement of riparian areas to achieve proper functioning condition or for the protection of the rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth. (4130.3-2 Other terms and Conditions)

Drought years with unfavorable climatic conditions may require changes to the active preference or actual use that has normally occurred in the allotment in any one year. Adjust grazing use, as necessary, which may include *but is not limited to* reducing livestock numbers, shortening the season of use, altering pasture move dates, changing pasture rotations, authorizing water hauling (after documenting NEPA compliance), closing allotments to grazing use, or allowing use in vacant allotments. (BLM IM No. 2013-094)

BLM may utilize the U.S. Drought Monitor as a tool to define and determine current drought conditions. When severe drought conditions exist BLM will consult, cooperate, and coordinate on a case-by-case basis with affected grazing permittees to implement an adaptive management approach using drought contingency plans. Some indicators to establish turn-in dates, may include ground cover, soil stability, soil moisture, residual stubble height, and/or plant maturity, in relation to site potential and present rangeland health. “

In addition to removing all range readiness criteria from the EA, WDA also urges Pinedale BLM replace all terms and conditions in the EA alternatives with the following language:

“Terms and Conditions to Appear on Grazing Permits:

1. The permittees must properly complete, sign and date an Actual Grazing Use Report (BLM Form 4130-5) annually. The completed form(s) must be submitted to the BLM Pinedale Field Office within 15 days from the last day of authorized annual grazing use.
2. Feed supplements such as but not limited to salt, mineral, protein block, and cottonseed cake may be allowed on the allotment to promote proper grazing distribution. If used, supplements will be located on ridge tops and/or approximately one-quarter mile away from any riparian habitat. Placement of supplements near water sources, such as wells and reservoirs, will consider rangeland objectives, such as grazing distribution, wildlife habitat requirements, and reclamation success. Mineral supplement blocks will not be placed within one-quarter mile of an occupied sage-grouse lek or a known Special Status Plant Species.(2008 Pinedale RMP) No more than 10% of the diet will come from supplemental feed.(Cody Grazing Lease GR491355 Terms and Conditions) Supplemental forages are prohibited unless specifically approved by the Authorized Officer in an emergency situation.(43 CFR 4140.1(a)(1)
3. Grazing use will be in accordance with the Standards for Rangeland Health and Guidelines for Grazing Management. Grazing use will also be in accordance with 43 CFR Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration.
4. Monitoring data will at a minimum reflect 5 years of information, include rangeland health assessments and require conclusion or action based on 3 out of 5 years of data if livestock grazing is determined to be a causal factor. (WY EO 2013-3)
5. BLM will meet with permittees, at minimum twice annually, before turnout to schedule maintenance activities and after the grazing season to discuss monitoring.(Pinedale 2008 RMP)

6. Maximum allowable use levels will be as follows: Key upland forage species: 50% of the current year's growth. Livestock will be moved to another authorized pasture or removed from the allotment before utilization objectives are met or no later than 5 days after meeting the utilization objectives.

7. The following changes to the grazing schedule may be allowed with approval by the authorized officer at the BLM: The request must be made at least 3 business days in advance.

a) The grazing permittees may change the actual use inclusive of where, how many, what kind or class of livestock, and how long livestock graze on an allotment, or on a portion or pasture of an allotment as long as the changes do not exceed active preference (active AUMs). (43 CFR 4100.5 )

b) Livestock may be required to exit the allotment earlier than scheduled if grazing use reaches or exceeds stipulated levels. Extensions based on utilization need to be approved in advance and as appropriate by the authorized officer at the BLM.

c) Drought years with unfavorable climatic conditions may require changes to the active preference or actual use that has normally occurred in the allotment in any one year. Adjust grazing use, as necessary, which may include *but is not limited to* reducing livestock numbers, shortening the season of use, altering pasture move dates, changing pasture rotations, authorizing water hauling (after documenting NEPA compliance), closing allotments to grazing use, or allowing use in vacant allotments. (BLM IM No. 2013-094)

d) Voluntary and coordinated non-use for resource protection may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans. (43 CFR 4130.2(3)(g))”

We remain uncertain in regards to Pinedale BLM's intended goal or objective for injecting restrictive language such as range readiness or eliminating tools such as protein blocks or cottonseed cake. The Rangeland Health Assessment (RHA) indicates 17 of the 18 allotments are in an “M” or “C” category, which indicates current livestock management is meeting BLM's standards.

We understand Boulder Landscape is a reference site for sage-grouse, which indicates livestock grazing and management is compatible with sage-grouse and other wildlife. Again, we believe Pinedale BLM fails to convey what their ultimate goal or objective is for the Boulder Landscape.

#### Page 12: Other Terms and Conditions:

Pinedale BLM only lists two terms and conditions under the No Action Alternative. WDA understands the No Action Alternative is what is required and implemented under current permits. We question why Pinedale BLM is requiring eight terms and conditions under the other alternatives.

#### Page 17:

*“Utilization of key, native perennial bunchgrasses would be limited to 50%. Key species would typically be...”*

WDA urges Pinedale BLM to remove “bunchgrasses” and the list of those species. Refer to page 16, under Terms and Conditions, number 7, states: *“Maximum allowable use levels will be as follows: Key upland forage species: 50% of the current year’s growth.”* The current vegetative state is a Wyoming Big-Sage/Rhizomatous Grass/Bluegrass. Utilization levels only on bunchgrasses will underutilize rhizomatous grasses, while removing livestock prematurely from the allotment. WDA insists Pinedale BLM consistently remove bunchgrass utilization levels throughout the document and replace it with “key upland forage species.”

Page 31: First Paragraph:

*When actual billed use differs from the permitted us, it is typically taken in the traditional use season but with fewer livestock.”*

We are unclear of the intent and overall meaning of the sentence mentioned above. WDA recommends rewording the sentence.

3.14 Vegetation: Fourth Paragraph:

*“Within Boulder landscape, grazing has resulted in increases in the density of sagebrush and some changes in the herbaceous plant communities.”*

WDA strongly disagrees with this statement. Utilization levels on the Boulder Landscape are below 50% in most areas and meet BLM standards for uplands. We recommend reviewing and referencing Cagney et al. 2010, page 8, which states, “Sagebrush cover naturally increases with time to a level in equilibrium with the site’s precipitation and snow conditions. As sagebrush increases, herbaceous productivity decreases. On sandy and loamy upland sites in the 10 – 14 inch precipitation zone, sagebrush canopy cover will stabilize at a level somewhere less than 35 percent measured by the point intercept method.”

Page 71: Livestock Grazing:

*“Range readiness criteria would be implemented to ensure that the key plant species are at a proper growth stage that will provide the necessary protein requirements to sustain a yearling or cow calf during the grazing season.”*

WDA does not support Pinedale BLM utilizing protein requirements as a catalyst to insert range readiness into the EA. We again reiterate our comments to remove range readiness from the EA.

Page 73: Soils/Special Status Plants/Vegetation:

Pinedale BLM must consistently analyze the impacts from both livestock and travel management throughout the document. Soils, special status plants, and vegetation lack any impacts divulged from travel management.

Page 74: First Paragraph:

*“In parts of the Boulder landscape, mid stature bunch grasses and forbs, both playing important roles in valuable wildlife habitats, are lacking both in production and abundance while rhizomatous grasses and sage brush are often over represented when compared to the RPC. The spring grazing season...”*

WDA supports deferred or rest rotational systems to meet a specific objective. However, this section of livestock grazing, along with the EA in its entirety, confuses the state and transition model. The analysis should address how to maintain or improve the existing plant community.

Third Paragraph:

*“In order to maintain established stands of bluebunch wheatgrass, delaying of spring grazing until plants have reached 6 inches in height is recommended (Ogle et al. 2013). Other researchers recommend attainment of at least 4 inches of growth for mid stature bunchgrasses (Holecheck 2004), or the development of at least 4 leaves on most plants (Fraser 2003) before initiation of spring grazing in bunchgrass communities.”*

Pinedale BLM again has inserted range readiness well beyond the scope of addressing plant vigor during drought years on an individual allotment basis. We fail to recognize the underlying concern or issue and actual reason for inserting range readiness criteria when BLM standards for upland vegetation have been met. If the goal is to transition from a sagebrush/rhizomatous grass community to a sagebrush/bunchgrass community, changes in livestock management will not change this vegetative state backwards according to Cagney et al. 2010. If the goal is to address sage-grouse nesting habitat, we question why the Boulder Landscape is currently considered a reference site with a viable population.

WDA does not support references such as Fraser 2003, which is a non-peer reviewed brochure from British Columbia, Canada. However, the brochure offers the following language we believe Pinedale BLM should consider from Fraser 2003:

- *“Flowering stages of these plants are too early for practical use of most grass species, and the grass heights have proven arbitrary and driven more by soil moisture than by phenology.”*
- *“The development stage is more difficult to determine in some species, such as bluebunch wheatgrass...”*
- *“More research and observation is needed on native grasses...”*
- *Flexibility and adaptation are the keys to successful range management.”*

*“All sage-grouse habitats would remain suitable in the short term with higher quality wintering habitat persisting at the expense of suitable but sub optimal nesting and early brood rearing habitat. Though some species may thrive in the current state (mountain plover and burrowing owls prefer more heavily grazed areas), other species may persist but not thrive.”*

Ultimately, if the goal is to transition the vegetative community to a sagebrush/bunchgrass community to address a bottleneck in wildlife habitat, the Pinedale BLM has failed to use existing wildlife or vegetative data to explain how a change in existing livestock grazing management will reach these goals. WDA supports a sagebrush/bunchgrass community, but unless the Pinedale BLM is willing to incorporate mechanical, biological, or chemical treatments to create mosaics in sagebrush communities, we will not support the inclusion of language such as “expense of suitable but sub optimal,” range readiness criteria, or the misleading notion that changes in current livestock management will transition the vegetative state.

Page 76:

*“West Nile virus outbreaks have been shown to be devastating to sage-grouse populations, and any sage-grouse die offs that could occur from WNV would play a huge role in reduction of the local population. Though MNV has been documented in the Upper Green River basin, elevation and the persistence of cold temperatures in the area may result in a lessened effect to the vector species. Though present, MNV may not currently pose a severe threat in the Upper Green. Never the less a threat does exist and potential for impacts would remain.”*

According to the James Ryegrass EA, also in Sublette County, it stated the following: “As of October 17, 2013, West Nile Virus had only been documented in Sublette County on two separate occasions. That last occurrence was documented in 2007 \*Wyoming Department of Health) therefore the likelihood of it occurring is low.”

WDA is concerned Pinedale BLM is inconsistently analyzing impacts of livestock grazing between EAs. We would not consider two documented cases of WNV playing a “huge role in reduction of the local population.” We urge Pinedale BLM to remove misleading language from the analysis.

Page 77:

Second Paragraph:

*“Range readiness criteria would be implemented for turnout which should improve upland health. It is anticipated that improvements to upland and riparian health will decrease sedimentation from public lands to streams.”*

If the allotments are meeting standards and including Standard #1 and Standard #3, we again ask Pinedale BLM, how range readiness would improve upland health or decrease sedimentation on an existing site, which already meets existing BLM Standards?

Alternative 1: No Action Alternatives: Livestock Grazing:

*“Continuous early season use could impact the vegetation’s growth and therefore could reduce the protein intake of cattle on the range. If cattle are competing for a limited supply of resources, weight gains and conception rates could be negatively affected and death loss could occur due to increased stress on livestock.”*

The analysis of the No Action Alternative should simply reflect no changes to current management without conveying a negative tone. We don’t believe Pinedale BLM has adequate data nor is it within the scope of BLM analysis to decide if weight gains or conception rates are meeting the needs or expectations of the livestock grazing permittees.

Page 78:

Recreation:

*“There would be no positive beneficial impacts to the recreation setting, recreation opportunities or compliance with appropriate travel on public lands.”*

The analysis continues a negative tone, when the No Action Alternative for Recreation should simply state, “Current recreational opportunities will remain in place.”

Vegetation:

*“Continued spring use could further reduce the ability of the native grasses to recover. Along with continuing drought conditions, the native habitat could be negatively affected.”*

Current management meets BLM standards. If the current vegetative state is in fact a sagebrush/rhizomatous grass community, what does Pinedale BLM want the native grasses to recover from? If drought is a concern, WDA recommends working individually with permittees to develop a Drought Contingency Plan to ensure native grasses are not over utilized during low precipitation years.

Page 79:

*“With no changes in grazing management, production of plant species would remain out of balance. Neither the grass nor forb component would increase to the levels call for in the reference state. Sagebrush and shrubs would remain at levels above what is described in the reference states for the ecological sites in the allotments.”*

We strongly disagree with the paragraph and analysis. No changes to grazing management would not “remain out of balance,” but instead, would remain in the current vegetative state. The current vegetative state is very stable and meets all of BLM RHA standards. Again, Pinedale BLM’s analysis uses a negative tone. The analysis should remain neutral and factual.

Wildlife and Fisheries Resources:

*“Sage-grouse habitats would remain suitable in the short term with higher quality wintering habitat persisting at the expense of suitable sub optimal nesting and early brood rearing habitat.”*

*“Though some species may thrive in the current state, other species may persist but not thrive. The quality and amount of forage and cover would continue to not provide the most ideal balance for all species involved.”*

Again, WDA is concerned the analysis contradicts BLM’s Rangeland Health Standards, including standard #4, Wildlife/Threatened and Endangered Species Habitat Health. The Sage-grouse Habitat Assessment Framework Table 27 on page 65 only indicated suitable or unsuitable habitat, but neglects to provide an explanation regarding what makes them as such. The limiting factor may not be due to livestock, but rather based on soil, precipitation, or sage-brush type, such as early sage.

Fisheries:

*“Fall trailing would be ‘uncontrolled’ which means that livestock could be present in the East Fork Common allotment season long. This would not be good for riparian health. There would be no range readiness turnout criteria or upland or riparian utilization criteria for moving animals.”*

We are under the assumption the East Fork Common allotment is meeting Proper Functioning Condition (PFC) with current livestock grazing management practices and the allotment is relatively small and primarily used to trail to and from the forest. We disagree with Pinedale BLM’s analysis stating the allotment would be used season long. Permittees will trail to the forest and not leave cattle in the allotment season long.

Page 80: Livestock Grazing:

*“Access to public lands for grazing would cease and would require livestock to remain on private lands.”*

The EA is for Boulder Landscape only, not for the entire Pinedale BLM office. The analysis should only cover the Boulder Allotments, which would leave options of moving livestock to other private lands, state lands, or other federal allotments.

Page 81:

Riparian Resources: Second Paragraph:

*“However, it is common for areas excluded from livestock grazing to experience increases in density and vigor of obligate wetland species such as Nebraska and beaked sedge.”*

Pinedale BLM should utilize existing riparian exclosures and studies to convey the negative impacts monocultures of Nebraska and beaked sedge can have on the ability for sensitive species, forbs, and woody species such as willows to establish.

Vegetation:

*“Wildlife would consume some of this extra vegetative growth, but overall the condition of the native habitat would be improved, which would be a benefit for wildlife. This would also help prevent upland erosion through increased vegetative cover, improving water quality.”*

*“Over a ten year period, the lack of grazing pressure could result in a slight increase in the frequency of some deep rooted perennial species and a shift in the plant community toward a more desirable bunchgrass/big sage status. However, this alternative alone would not be sufficient to reduce the dominance of shrubs in the vegetative community.”*

*Increases in the standing crop of herbaceous vegetation under this alternative could lead to a chance in wildfire. Wildfire would provide the needed energy input to reduce the dominance of sagebrush in the plant community, further allowing ecological sites to shift toward the Bunchgrass/Sagebrush state.”*

We are very concerned over this analysis. Are there current upland erosion issues in the Boulder Landscape? If the allotments are meeting standards, we question the need to convey an issue, which likely does not currently exist. Additionally, we continue to comment regarding the notion of a backward vegetative transition model. Removing livestock will not transition the site from a sagebrush/rhizomatous grass community to a sagebrush/bunchgrass community. Nor will wild fire shift the ecological site toward a sagebrush/bunchgrass community. We recommend referring to the Cagney et al. 2010 paper, showing wildfire removing sagebrush, opening the canopy for bunchgrasses to reestablish. Wildfire will shift the site to a bunchgrass site, not a sagebrush/bunchgrass community.

Page 82: Wildlife Fisheries: Second Paragraph:

*“In addition to the elimination of the potential direct impacts of trampling of wildlife habitats, the resulting benefits from complete rest for a period of 10 years across the Boulder landscape would greatly benefit nearly all wildlife species.”*

The no grazing alternative is not just for 10 years. The analysis should reflect a permanent closure of livestock grazing, which could have long term negative impacts to wildlife habitat. We recommend referencing Wyoming Game and Fish Department owned lands where cattle are regularly used to improve plant vigor for the benefit of elk and other wildlife. Also, we urge Pinedale BLM to reference peer reviewed studies and/or on-site locations where “trampling” is an issue. Additionally, Pinedale BLM should define trampling in the EA. See also page 86 regarding “trampling.”

*If grazing were removed from the landscape indefinitely, natural ecological processes could in the long term result in a balancing effect on the plant communities, shifting them toward the reference state resulting in an overall benefit to all wildlife species."*

WDA strongly urges Pinedale BLM review the Cagney et al. 2010 paper and remove all references inferring removal of livestock or changes in existing grazing practices will transition the rhizomatous grass communities to a bunchgrass community. If the allotments were in a sagebrush/bunchgrass community, the discussion and analysis would revolve around maintaining the community in their current state.

*"Big game species have been documented to completely avoid areas where cattle use is occurring. Removal of livestock from the landscape would eliminate the avoidance of these areas."*

WDA urges Pinedale BLM provide documentation and avoid subjective statements in the EA.

Page 87: Fisheries:

*"Range readiness criteria would be implemented for turnout along with a delay until June 16 in portions of the allotment which should improve upland health."*

WDA does not support the implementation of range readiness. Additionally, page 37 states *"Range condition on most of the sites was considered "good." Two transects located in areas where livestock concentration tends to be dense, scored in the "fair" range."* Pinedale BLM can work with individually using adaptive management to address the areas with a "fair" condition rating.

Page 88: Vegetation:

*"This alternative would change the season of use to a late season use period in allotments containing more than 1,000 acres. This delay in spring would allow the native vegetation a period of undisturbed early growth which ..."*

The Fall Grazing alternative is not a delay in spring, but rather a deferment to fall grazing.

Page 89: First and Second Paragraph:

*"...the 50% utilization limit, reducing cover and potential forage available in the fall and winter or early spring of the following season. In the spring of the year, residual cover would be reduced in the initial states of sage-grouse nesting but would progressively increase..."*

*"Overtime the grass component's ability to mature each year, produce seed, and the seeds' ability to grow into new grass plants could shift the community toward the reference plant community, providing long term benefits in nesting and brood rearing cover."*

WDA disagrees with the first statement regarding a reduction in residual cover in the spring. At a 50% utilization rate from the current year's growth, residual vegetation following fall grazing will still provide the adequate residual for successful nesting cover for sage-grouse.

The second statement is yet another example of Pinedale BLM misunderstanding the state and transition model. Again, we urge Pinedale BLM reference the Cagney et al 2010 paper throughout the entire EA.

Page 91:

Proposed Action:

*"The proposed action would have minimal cumulative effects to rangeland health because the proposed action includes range readiness criteria, flexibility in turnout dates..."*

First, WDA does not support the insertion of range readiness as previously stated, but secondly, the inclusion of range readiness into the Proposed Action does not solve the cumulative effects to rangeland health. We recommend removing this statement.

Page 91: No Action Alternative:

*"The no action alternative would have minimal cumulative impacts on livestock grazing because the current livestock grazing scheme would not be changed."*

The other four listed alternatives are referencing cumulative effects/impacts to rangeland health, but the No Action Alternative is referencing cumulative impacts on livestock grazing. We suggest the analysis consistently refer to "cumulative effects," not "impacts" as well as for the Livestock grazing section, the EA should analyze the cumulative effects to livestock grazing should the Pinedale BLM select the alternative.

Overall, the WDA is genuinely concerned the Pinedale BLM has inadequately developed a sound EA or analysis for the Boulder Landscape Plan. This programmatic approach to permit renewals is the first in the Pinedale BLM office. In its current condition, we believe this EA will not hold up against litigation, nor should the BLM use this as a model for other future programmatic permit renewals in this office.

We strongly urge Pinedale BLM to re-evaluate this EA and meet the original objective behind a permit renewal, which is to meet standards and guidelines. The insertion of range readiness has weakened the document, not strengthened it. The analysis should neutrally inform the reader of the possibilities of impacts regarding each of the alternatives. Pinedale BLM's analysis of the Boulder Landscape Plan continuously tries to sway the reader to establish an opinion and likely select the alternative, which best meets Pinedale BLM's needs, not what's best for the resources.

Boulder Landscape

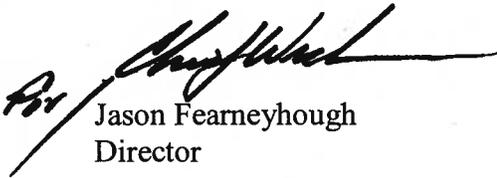
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In conclusion, we respectfully request Pinedale BLM adequately address the comments and re-issue a new draft EA for public review prior to issuing a draft Proposed Decision. We believe the proposed changes would constitute additional time for review and provide assurances to the public, cooperating agencies, and permittees of a reviewing a more defensible document.

We appreciate the opportunity to comment. If you need clarification of our comments, please don't hesitate to contact us.

Sincerely,

  
Jason Fearneyhough  
Director

JF/jw

CC: Governor's Policy Office  
Wyoming Game and Fish Department  
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