



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

February 15, 2013

Bureau of Land Management
Rock Springs Field Office
c/o Cherette Mastny
280 Highway 191 North
Rock Springs, WY 82901

Dear Cherette,

The Wyoming Department of Agriculture (WDA) appreciates the opportunity to provide Scoping comments for livestock trailing on public lands in the Bureau of Land Management (BLM) Rock Springs Field Office (RSFO).

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.

The WDA understands and supports the RSFO in their efforts to identify livestock trailing routes and identify and analyze their impacts. Livestock operators have trailed livestock from their base properties to grazing permits on Forest Service and BLM lands for generations. They trail for multiple reasons, including, but not limited to weather, economics, reduced allotment accessibility by semi-trucks, and locations of public/private pasture. Trailing is crucial for most of these operations and is a part of their custom and culture. We offer the following comments regarding the proposal by the RSFO.

The WDA encourages the RSFO to analyze two alternatives in an Environmental Assessment (EA):

- 1) Alternative 1—No Action Alternative (No Trailing)
- 2) Alternative 2—Proposed Action (Trailing)

Alternative 1 would allow the RSFO to analyze the effects to producers and other resources with no trailing, while Alternative 2 would analyze trailing, and include the identification of existing routes and numbers.

The WDA encourages the RSFO seek State BLM general guidance and neighboring Field Offices (FO) for developing the trailing EA. Trailing is complicated with many livestock operators crossing private and public lands, county boundaries, state lines, and BLM field office boundaries. Specifically, the Rawlins FO is analyzing the impacts of trailing on the Six Wyoming Standards for Healthy Rangelands. We support this approach.

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The two alternatives we provided could include identification of areas of importance, such as sage-grouse leks, crucial winter ranges, big game parturition areas, and Native American Religious Concerns or Historic Properties. The identification of trailing routes, timing of route use, including possible short-term crossing, and the areas of importance could determine if trailing and crossing would cause negative impacts. In areas where a negative impact is predicted, BLM would work cooperatively on a case-by-case basis with the livestock grazing permittees to find solutions to reduce impacts by avoiding the areas if possible.

The WDA insists the RSFO include flexibility into their decision to allow for unforeseen circumstances such as change of permit holders, change of private lands ownership, change of historical use of trails, development of new routes, and for yearly requests of crossings across an allotment outside of the designated trails. We believe the two-alternative approach would allow more flexibility to the authorizing officer to make the best decision on a case-by-case basis, and reduce impacts on the livestock grazing permittees and the environment.

We urge the RSFO to specifically analyze the socio-economic impacts of eliminating trailing. The elimination of trailing would, without question, cause extreme economic hardships to grazing permittees. Specifically, we find it important to consider the vast expense of loading and trucking livestock from location to location, instead of trailing. Additional socio-economic impacts the RSFO should analyze is the historical and cultural significance and value of trailing livestock in these areas. Many people place value in seeing herds of cattle and sheep trailed through their communities or seeing traditional herding camps throughout the area.

We emphasize the importance of working very closely and cooperatively with local livestock grazing permittees and neighboring BLM offices to understand the historic significance of trails, where current routes are located, where each permittee holds public grazing permits and owns private lands. We urge RSFO to allow flexibility to accommodate weather, increases or decreases in forage, turn-out dates on Forest Service allotments, changes in grazing rotations, conversions of livestock, or other unique scenarios. Finally, we ask RSFO to develop and include a glossary of terms inclusive of both "trailing" and "crossing" for clarification.

We thank the RSFO for the opportunity to comment and incorporating our comments into the future EA. We encourage your office to contact us with any concerns and questions.

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
Wyoming Game and Fish Department
Rocky Mountain Farmers Union
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