



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

March 12, 2014

Bureau of Land Management
Attention: Travis Ames
P.O. Box 768
1625 W. Pine St.
Pinedale, WY 82941

Dear Mr. Ames,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Pinedale Bureau of Land Management Field Office's (PFO) Environmental Assessment (EA) proposing to renew a livestock grazing permit for two allotments in James Ryegrass and Webb Draw Pasture.

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, including appeals and protests, and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA supports the Proposed Action to renew the grazing permit for both James Ryegrass and Webb Draw Pasture Allotments. We appreciate PFO accepting and including our previous comments on the Draft EA. However, we offer the following comments to the current version:

General:

- Comment: WDA had a significant number of comments pertaining to the inconsistency for riparian terminology and Proper Functioning Condition (PFC) assessment. PFO neglected to include any of our riparian comments. WDA requests a response to comments from PFO regarding our January 29, 2014 letter to understand why our comments were not included.

Page 10: 3.5 Livestock Grazing:

"It is evident that great numbers of cattle and sheep once dispersed over the then free and open range. The reported practice of ranchers was to drive their cattle to the mountains for the summer months and permit them to scatter over the public lands at the lower elevations..."

- Comment: The entire paragraph is subjective. We believe the word "evident" exudes unnecessary negative connotations to livestock grazing. Also, PFO uses the word "permit," which could cause confusion. WDA recommends utilizing a historical resource or remove the paragraph.

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Page 12: 3.9 Riparian Resources:

- Comment: The section includes background information pertaining to the Webb Draw Pasture, but lacks any information for James Ryegrass. We understand James Ryegrass does not have any riparian areas. We recommend PFO specifically state this to ensure the EA is clear in its entirety.

Page 16: Greater Sage-grouse:

- WDA continues to urge PFO reference the State of Wyoming Executive Order 2013-3: Greater Sage-Grouse Core Area-Grazing Adjustments. This Executive Order requires coordination with BLM when grazing adjustments are necessary to benefit sage-grouse.

Page 25: Livestock Grazing:

“The deferred grazing system in James Ryegrass would ensure that key plant species are rested during critical growth stages in some years and will provide the necessary protein requirements to sustain a yearling or cow calf pair during the growing season.”

- Comment: WDA recommends removing “rest” from the sentence and only discuss deferment. We recommend PFO refer or include the following definitions to alleviate any future misunderstanding or change in expectations:

Deferment-The delay of grazing to achieve a specific management objective. A strategy aimed at providing time for plant reproduction, establishment of new plants, restoration of plant vigor, a return to environmental conditions appropriate for grazing, or the accumulation of forage for later use. *cf. deferred grazing, rotational deferred*¹

Rest-To leave an area of grazing land ungrazed or unharvested for a specific time, such as a year, a growing season or a specified period required within a particular management practice. *Syn. spell. cf. rest period, ungrazed, deferment*²

Page 32: Vegetation:

“Over the long-term, the no grazing alternative would improve the plant community vigor by allowing the native grasses to produce greater above ground foliage and increase the root reserves throughout the season. Wildlife would consume some of this extra vegetative growth, but overall the condition of the native habitat would be improves, which would be a benefit for wildlife. This would also help prevent upland erosion through increased vegetative cover, improving water quality.

¹ Society for Range Management. 1998. *Glossary of terms used in range management, fourth edition*. Edited by the Glossary Update Task Group, Thomas E. Bedell, Chairman. Used with permission.

² Society for Range Management. 1998. *Glossary of terms used in range management, fourth edition*. Edited by the Glossary Update Task Group, Thomas E. Bedell, Chairman. Used with permission.

This alternative would also provide rest for the plant community and the lack of grazing pressure could allow plants such as Indian ricegrass, needle and thread and Bluebunch wheatgrass to become more vigorous and produce more seed. 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 vegetation community.

This alternative would have a beneficial impact compared to the proposed action. ”

- Comment: WDA is very concerned PFO continues to negate the Cagney et al 2010 paper with unreferenced and biased analysis statements provided above. What study shows a ten year period is the required amount of time for the vegetation community to shift in plant communities? Who determines what “slight increase in frequency” is?

WDA previously requested in January 2014 comments for PFO to refer and reference the Fourteenmile Exclosure (Cagney 2010). Page 15 of Cagney et al states:

“The Fourteenmile exclosure (Figure 7), built north of Rock Springs, Wyoming, in the 1960’s, is one of many exclosures scattered across Wyoming demonstrating that the backwards transition (Figure 6) does not occur when grazing pressure is removed. Sites in the sagebrush rhizomatous grass/bluegrass state generally exhibit their stability in exclosures. Some have speculated that these exclosures demonstrate that grazing does not affect rangeland composition and productivity or that hoof action is necessary for rangeland health. More accurately, changing grazing management or eliminating grazing on sites in the sagebrush rhizomatous grass/bluegrass state has a limited effect. It is critical range managers and sage-grouse habitat biologists do not predicate their habitat management strategy on the presumption that the backwards transition is readily achievable through grazing management.”

PFO conveys the removal of grazing only creates possible positive benefits, but neglects to include the possible negative effects of removing grazing, including an eventual decrease in plant vigor, increases in fire, loss of wildlife habitat, etc.

Page 35:

Livestock Grazing: 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.”

- Comment: WDA is genuinely concerned PFO has inadequately analyzed Chapter 4.2 Cumulative Effects. How would someone quantify “minimal cumulative impacts to livestock grazing?” What are some actual cumulative impacts? We recommend BLM consider: increased fire, sale of private ranchlands, increase in subdivisions, loss of wildlife habitat, increase in predation, etc.

Livestock Grazing: No Livestock Grazing Alternative:

"The no grazing alternative would have maximum cumulative impacts to livestock grazing because livestock would be removed from public lands."

- Comment: What are "maximum cumulative impacts?" Please see WDA's previous comments.

Livestock Grazing: No Grazing Alternative: Vegetation:

"Livestock grazing is the activity that would have the largest impact on vegetation communities in James Ryegrass and Webb Draw Pasture. It is reasonable to expect continued drought conditions, which could delay favorable vegetation responses or speed unfavorable ones."

- Comment: WDA is unsure what the intent and cumulative effect is for the vegetation section above. What does drought have to do with removal of livestock grazing and a cumulative effect? We reiterate our concern regarding all of Chapter 4: Cumulative Effects and recommend PFO address deeper, long-term impacts for each of the alternatives.

WDA reiterates our support of the Proposed Action to renew the livestock grazing permit on the Allotment. We have on-going concerns regarding riparian areas, analysis of removing livestock grazing, and PFO's misunderstanding of the state and transition model for vegetation communities. We are available to answer any concerns or questions and look forward to a final decision to renew the grazing permit.

Sincerely,


for/ Jason Bearneyhough
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