



*Wyoming*  
DEPARTMENT OF *Agriculture*

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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.*

March 26, 2020

Mr. Tim Kramer  
United States Bureau of Land Management  
Lander Field Office  
1335 Main Street  
Lander, WY 82520

Dear Mr. Kramer,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Green Mountain Integrated Vegetation Management Plan (Plan) by the Bureau of Land Management (BLM) Lander Field Office (LFO).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the proposed action affects our agriculture industry, our natural resources, and the welfare of our citizens, it's 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 was disappointed the LFO's proposed project was publicly noticed without notifying Cooperating Agencies including the State of Wyoming. In addition, the LFO notice only provides a map but fails to provide any details regarding the type of projects, size, or location of potential vegetation treatments. The lack of detail makes it difficult to provide specific comments that will ensure a well informed National Environmental Policy Act (NEPA) document.

WDA requests the Plan consider how year-long grazing by wild horses negatively impacts rangeland health across the proposed project area. We do not support the reduction or elimination of livestock grazing to implement any site specific treatment or to mitigate the impacts wild horses have on the landscape.

We strongly support implementation of vegetation management projects to work towards meeting standards for healthy rangelands. In addition to vegetation treatments we recommend LFO incorporating the use of range improvement projects to potentially mitigate loss of forage following the treatments, to improve livestock grazing management, and ultimately better utilize available forage outside of treatment areas.

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We encourage the LFO consider and analyze the following impacts on livestock grazing management and grazing permits in the project area: introduction and spread of noxious weeds, increased number of vehicles in the area potentially causing death or impairments of livestock during project implementation, damage to fences and other range improvements, as well as other detrimental social and economic impacts. We strongly encourage LFO to consider mitigation measures for livestock grazing permittees to continue livestock grazing in the project area, while working towards meeting the identified vegetative objectives following treatments.

We strongly encourage LFO officials to work closely with all livestock grazing permittees and private landowners potentially impacted by the proposed project. We request LFO officials cooperate with livestock grazing permittees to identify the vegetation treatment, develop vegetative objectives, and evaluate the time needed if grazing was temporarily ceased on the treated area. WDA opposes LFO or other agencies establishing mandatory a two-years rest on any treatment. Deferment of grazing should be considered on a case-by case-basis. Livestock grazing on the treated areas should resume at the first feasible opportunity after meeting the established vegetative objectives.

WDA requests the LFO to include us as an Interdisciplinary (ID) Team Member and a Cooperating Agency on the proposed project. The potential significant impact to the livestock grazing industry is concerning, therefore we would request working closely with the LFO.

In conclusion, we appreciate the opportunity to provide comments on the proposed project and look forward to working closely with your agency in the near future.

Sincerely,



Doug Miyamoto  
Director

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CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Farm Bureau Federation  
Wyoming Association of Conservation Districts  
Rocky Mountain Farmers Union  
Wyoming Game and Fish Department  
Wyoming Wool Growers Association  
Wyoming State Grazing Board