



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

April 18, 2011

Lance Porter, District Manager
Rock Springs Field Office
Bureau of Land Management
280 N Hwy 191
Rock Springs, WY 82901

Subject: Bureau of Reclamation Lands - Land Transfer

Dear Mr. Porter,

The Wyoming Department of Agriculture (WDA) is aware of a possible land transfer of Bureau of Reclamation (BOR) lands to the US Fish and Wildlife Service (USFWS). We understand these lands, consisting of approximately 150,000-acres, are adjacent to Seedskafee National Wildlife Refuge (Seedskafee) and the Big Sandy River.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. The proposed land transfer to the USFWS will impact our agriculture industry, our natural resources and of our citizens. We feel it is important the WDA be provided all pertinent information and maps and be provided the opportunity to express pertinent issues and concerns on any proposal to transfer these BOR lands to any other agency or entity.

Currently, the BOR lands are managed by the Bureau of Land Management (BLM) and are managed for multiple use and sustained yield. If the BOR no longer requires these lands, the WDA strongly encourages the BOR transfer these lands to the BLM. The management of these lands would not change from current management and would allow current multiple uses (livestock grazing, recreation, oil and gas development, etc.) to continue. We are opposed to transferring these lands to the USFWS due to the lack of management by the USFWS for multiple uses and the tendency to manage for a single species, in this case sage-grouse.

We also encourage any land transfer process be fully transparent and open to the public with a public review process and comment period. We are concerned that the Department of the Interior may simply transfer these lands without due cause and without an open process involving the public.

The WDA has several areas of concern needing considerations by the BOR prior to a potential land transfer:

Livestock Grazing Management

There are several livestock grazing allotments and livestock trailing routes located within the potential land transfer area. Over 75% of one allotment lies within the proposed area. Our

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concern is how these affected allotments will be managed. If livestock grazing is reduced or eliminated in any of the existing allotments this action would be considered a significant impact to the livestock grazing permittees, their operations, their economic sustainability and the socio-economics of the local economy.

Wild Horse Management

There are two Wild Horse Management Areas (White Mountain WHMA and Little Colorado WHMA) located in the proposed area. The BLM is already tasked with managing these areas for wild horses and maintaining their populations at Appropriate Management Levels (AMLs). The proposal to transfer these lands must consider how wild horses will be managed and how AMLs will be maintained.

Recreation

The Wyoming Game and Fish Department (WGFD) have already expressed concerns regarding the proposed transfer to the USFWS in a letter dated March 14, 2011. The WGFD, like the WDA, is concerned about the lack of management for multiple uses and they insist on allowing the hunting, trapping, fishing, and dispersed recreation/camping that currently occurs under BOR/BLM management. In addition, these lands are open for other recreation uses and this use needs to be considered in the potential land transfer process.

Sage Grouse Management

It is the intent by the USFWS to claim this land and manage it for the conservation of sage-grouse. The WDA supports the conservation of sage-grouse; however, the proposed area already exists within the Governor's Core Area created under the Governor's Executive Order (2010-04). The USFWS has had full representation on the Sage-Grouse Implementation Team and recognizes the strategy as a valid and long-term approach to conserve the species. To suggest the need for additional conservation within the core area is stating the Governor's Executive Order is insufficient in conserving sage grouse within Wyoming.

Energy Development

There is an existing gas field (Stagecoach Draw) located in the center of the proposed land transfer area. It is our assumption that most of the proposed land for transfer is currently leased for fluid minerals. Future and current management of oil and gas resources and existing mineral rights must be considered prior to transfer of any lands.

The WDA strongly encourages the BOR transfer these lands to the BLM. The land is currently being managed under multiple use by the BLM. They are managing livestock grazing, wild horses, recreation, and energy development and have provided the appropriate management measures to continue to conserve sage-grouse in the proposed area. The transfer to the BLM makes sense and is in the best interest of the citizens of Wyoming.

The WDA would also support the BOR maintaining these lands under current management. The BOR would maintain ownership, with the BLM continuing to manage the lands for multiple uses. We are unaware of any concerns or problems with the current management and operation of this region.

We respectfully request the BOR refrain from any decision of a land transfer until a full and open public process is completed. We look forward to hearing your proposed plans for a land transfer and the specific details and acres the proposal will entail.

Sincerely,

A handwritten signature in black ink that reads "Jason Fearneyhough". The signature is written in a cursive, flowing style.

Jason Fearneyhough
Director

JF/jc/cw

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