



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

April 30, 2015

North Trail Proposal
Bureau of Land Management
Kemmerer Field Office
430 North Highway 189
Kemmerer, WY 83101

Dear Mr. Mier,

The Wyoming Department of Agriculture (WDA) appreciates the opportunity to provide comments pertaining to the proposed action by the Bureau of Land Management (BLM) Kemmerer Field Office (KFO) to authorize livestock trailing across BLM administered lands in the northern portion of the KFO.

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 BLM in their efforts to identify livestock trailing routes and their possible impacts. Livestock operators have trailed livestock from their base properties to grazing permits on Forest Service and BLM for generations. They trail for multiple reasons, including, but not limited to weather, economics, 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 North Trail proposal by the KFO.

We believe the KFO should analyze two alternatives:

- 1) Alternative 1—No Trailing
- 2) Alternative 2—Trailing

Alternative 1 would allow the KFO to analyze the effect to producers and other resources with no trailing, while Alternative 2 would analyze trailing, and include the identification of the existing routes and numbers. This would provide the BLM the ability to authorize trailing/crossing on a case-by-case basis. BLM should develop and analyze a programmatic National Environmental Policy Act document for the trailing management plan to ensure individual trailing permits are not appealed, due to the fact the trailing system works as a unit.

The analysis of the two alternatives we provided should include identification of areas of importance, such as sage-grouse leks, crucial winter ranges, big game parturition areas, 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 should 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.

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WDA encourages KFO seek State BLM guidance for developing the trailing protocol across the state. Trailing is complicated with many livestock operators crossing private and public lands, county boundaries, state lines, and BLM field office boundaries.

WDA insists KFO 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 crossing an allotment outside of the designated trail(s). We believe the two-alternative approach would allow more flexibility and allow the authorizing officer to make the best decision on a case-by-case basis.

We urge the KFO to specifically analyze the socio-economic impacts of eliminating trailing. The elimination of trailing would, without question, cause extreme economic hardships for grazing permittees. Specifically, we find it important to consider the vast expense of loading and trucking livestock from location to location, instead of trailing. Additionally, KFO should analyze 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 KFO 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.

We thank the KFO for the opportunity to comment. We encourage your office to contact Justin Williams, Senior Policy Analyst at 307-777-7067 with any concerns or questions.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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