



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

June 16, 2017

Mrs. Amanda Small
Rangeland Management Specialist
United States Bureau of Land Management
Lander Field Office
1335 Main Street
Lander, Wyoming 82520

Dear Mrs. Small,

Following are the Wyoming Department of Agriculture (WDA) scoping comments regarding the Bureau of Land Management, Lander Field Office (BLM) proposed grazing permit renewal for the Fraser Draw Allotment.

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 project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

First and foremost, we would like to express our gratitude for the updated scoping letter format and believe it is a vast improvement over some of the previous scoping letters (e.g., Silver Creek).

The scoping letter indicates the allotment is not meeting all of the Standards for Healthy Rangelands. According to Web Soil Survey (NRCS) this area contains a large number of different Ecological Site Descriptions and soil types. While some of these areas may be similar enough to assess together, the size of the allotment would seem to necessitate additional data gathering. We understand the Muskrat Basin/Government Draw Land Health Assessment (which includes Fraser Draw) is not yet available. Once a draft conformance review is available, we may provide more specifics comments.

Our records indicate the allotment is 97.38% within the Greater South Pass Core Area (Executive Order 2015-4). We suggest the BLM review and consider recent Washington Office clarification regarding Rangeland Health Standards and Evaluations, sage-grouse habitat objectives and permit renewals (Attachment 1). While we recognize this clarification document refers to the recent plan amendments for neighboring Field Offices ("9 Plan"), we also recognize Instruction Memoranda apply to all BLM. This obviously puts Lander BLM in a unique position and we would again offer any help we may provide in terms of sage-grouse and permit

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Fraser Draw Allotment Scoping

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renewals. The BLM should also consider focusing on sagebrush habitat, and possible ways to increase available forage for livestock (e.g., mowing, prescribed fire, etc.) rather than sage-grouse independently.

BLM should coordinate with permittees to determine whether or not new infrastructure is needed on the allotment. This may include stock watering location or tanks, fences, etc. We also highly suggest the BLM consider permittees on-the-ground knowledge of the allotment during analysis and work with them to develop a preferred alternative.

We support the renewal of the Fraser Draw permit and look forward to working with you in the future. Thank you for the opportunity to comment.

Sincerely,

Doug Miyamoto
Director

DM/jb

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming County Commissioner's Association

Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association
Public Lands Council

Clarification of the Relationship between the Greater Sage-Grouse Habitat Objectives, Rangeland Health Standards and Evaluations, and Use Authorizations Including Grazing Permit Renewals

OVERVIEW

The BLM plays an important role in fostering the long-term viability of Sage-Grouse by ensuring the continued existence of sagebrush habitat. The BLM recognizes that livestock grazing is an important component of its multiple use mission and that proper grazing is sustainable and compatible with conserving Sage-Grouse habitat and sagebrush rangelands and can assist with improving Sage-Grouse habitat. BLM's goal in managing to meet Rangeland Health Standards is to provide for the long-term sustainability of rangelands for livestock grazing, wildlife habitats, and other uses.

The BLM has received several requests to clarify the use of the Sage-Grouse habitat objectives table, often referred to as Table 2-2, in the Greater Sage-Grouse Approved Resource Management Plan Amendments (ARMPAs) and RMP revisions and their relationship to land health standards, processing grazing permit renewals, and authorizing other uses of BLM rangeland in areas designated as Sage-Grouse habitat. The habitat objectives table in the ARMPAs and RMP revisions should be used to assess Sage-Grouse habitat conditions, evaluate habitat condition trend over time, and develop long-term management objectives. No single indicator from the habitat objectives table or one-time measurement of the indicators in the table should be used to determine habitat conditions. The condition of a site will vary across time, driven largely by uses and environmental fluctuations such as annual rainfall (i.e., the potential for a given ecological site to produce Table 2-2 habitat characteristics can and does vary widely across years). Thus, it is critical that habitat condition be evaluated based on current conditions and long-term trend.

DISCUSSION

When using the habitat objectives table, it is important to understand the appropriate use of the table and the limitations and consideration for such use.

Following are some examples of appropriate use of the habitat objectives table:

- Informing the suitability of seasonal habitats for GRS when the sample location has the ecological potential to produce the indicator values (desired conditions) identified in the habitat objectives table. The indicators should be used in combination with each other to make a suitability rating, without reliance on a single indicator. Environmental conditions that affect the indicator values, e.g., drought, date of measurement, should be taken into consideration.

- Determining if the long-term trends of specific rangeland attributes within the area of interest are at or trending toward the desired condition given the potential of the area, e.g., the trend of perennial bunchgrasses, forb diversity, or annual grass cover.
- Establishing long-term objectives for specific rangeland attributes given the potential of the site, e.g., increase the plant community resistance and resilience by increasing the abundance of desirable perennial grasses to a level reflective of site potential over the next 10 years
- Informing departure from the desired condition based on the ecological site potential:
 - If sufficient monitoring sites are present for the area being assessed and,
 - Supplemented with professional judgement and other information provided through cooperative monitoring with the permittees or other stakeholders.
- Informing the evaluation of land health standards and providing the basis for developing thresholds during grazing permit renewal in Greater Sage-Grouse Priority Habitat Management Areas as specified in the ARMPAs. Clarification on how to develop thresholds for grazing permits in Sage-Grouse habitat is underway by a BLM interdisciplinary team and will be provided separately.

Following are some examples of inappropriate use of the habitat objectives table:

- Using the objectives as default desired conditions without considering the ecological site potential of any specific rangeland site,
- Using a single indicator to determine habitat suitability or impacts of livestock grazing or other uses in GRSG habitat,
- Using stand-alone, one point-in-time measurements for decision-making. For example, seasonal and annual moisture variations have significant impacts on vegetation structure and composition and these impacts must be taken into consideration. Trend can only be determined through multiple years of monitoring data covering a representative range of seasonal and annual variations.
- Adjusting permits based on the indicator values in the table without adequate monitoring, identification of causal factors for deficiencies, or consideration for other wildlife species.

The Sage-Grouse Habitat Assessment Framework is a tool to assess the suitability of Sage-Grouse seasonal habitats, home ranges, and population area characteristics. It is not an allotment assessment tool but the results of the multi-scale assessment are used to inform allotment evaluations that contain Sage-Grouse habitat. Allotments will continue to be evaluated using the established land health standard process and quantitative monitoring protocols and those allotments with seasonal Sage-Grouse habitat will include a discussion of the suitability of the habitat within the allotment being evaluated.

The following section discusses the relationship between GRSG habitat assessments and Grazing Permit Renewals:

- The process for Grazing Permit Renewals has not changed. Standards for Rangeland Health must be achieved, maintained, or significant progress towards achievement must be shown.
- Tools in the toolbox for land health assessments, land health standards evaluations and Grazing Permit Renewals continue to include: Interpreting Indicators of Rangeland Health (with an interdisciplinary team), range-site trend, utilization levels, season of use, appropriate stocking levels, Proper Functioning Condition (PFC), Multiple Indicator Monitoring data, BLM core indicator data, and fire occurrence data. The result of the Sage-Grouse habitat assessment, informed by the habitat objectives and ecological site potential is now another tool in the toolbox. Data collected through cooperative monitoring may provide some of this information.
- When completing a rangeland health evaluation that includes GRSG habitat, or any other SSS or T&E species:
 - Develop appropriate long-term objectives, with paired short-term indicators, considering the species of concern and its habitat needs and identify sites with the potential to achieve these objectives. For Sage-Grouse, long-term objectives will be derived from the habitat objectives table as described above and in the background section (including considering ecological site potential) and used to assess whether the SSS standard is being met. Short-term indicators could include utilization, bank alteration, period of use, livestock numbers, and distribution of use. Short term indicators should be developed with the intent of supporting achievement of the long-term objectives and in the case of Priority Habitat Management Areas for GRSG, includes developing thresholds.
- If the results from a rangeland health evaluation or monitoring data indicate that the SSS (e.g., Sage-Grouse) or T&E habitat objectives, are not being met or making significant progress toward meeting:
 - Determine and document the causal factor(s) in accordance with BLM Handbook 4180, Rangeland Health Standards. Factors might include livestock, wild horses and burros, drought, historic use, big game use, and/ or recreation, or other causes,
 - If current livestock grazing is a (the) Significant Causal Factor, in coordination with the permittee, determine what livestock practices need to be modified and make the appropriate adjustments before the start of the next grazing season. Modification could include increased flexibility in the terms and conditions of the permit to accommodate seasonal habitat needs of the Sage-Grouse. Note that the appropriate management action may require additional NEPA analysis and a new decision through the permit renewal process before the modifications can be incorporated into the grazing permit,
 - If current livestock grazing is not a significant factor, work with the appropriate user(s) to take the appropriate management action(s) related to the causal factors to make progress toward meeting the SSS or T&E objective. Note that this may require additional NEPA analysis and a new decision to implement the change.

- Establish a monitoring program to validate the change is accomplishing the desired results
 - If current grazing is a significant factor, develop and implement a monitoring plan in cooperation with the permittee and state partners.
 - If another use is a significant factor, work to establish a cooperative management and monitoring program with the user(s)
- Local government entities with recognized special expertise (e.g., county or conservation district) should be engaged to assist with management options and monitoring programs.

BACKGROUND

Throughout the range of Greater Sage-Grouse, but particularly in the Great Basin, wildfire and exotic annual grass invasion are persistent threats to the health of the sagebrush ecosystem. Maintaining resistance to exotic annual grass invasion and resilience to recover after fire and other disturbance is a significant component of ensuring plant communities have the long-term capacity to produce habitat attributes important for Sage-Grouse, other wildlife, and livestock. Active management of the rangelands is necessary to address these and other threats and ensure healthy resources for grazing, wildlife, and other uses.

The BLM applies rangeland health standards to assess rangeland health regardless of use. If rangelands are meeting and/or are making significant progress toward meeting all applicable standards, adjustments to uses are typically unnecessary. If rangelands are not meeting the standards of rangeland health or making significant progress toward achieving the standards, BLM determines the causal factor(s) and implements appropriate management actions to meet or make significant progress toward meeting the standard(s). A monitoring plan is implemented to determine if the action(s) is (are) accomplishing the desired result.

Determining the impact of management and environmental factors on plant communities involves monitoring and assessment of both short-term use indicators and long-term objectives. Short-term use indicators (e.g., utilization, bank alteration) are relevant to the use being monitored, can be readily measured, and help to inform whether long-term objectives are likely to be met. Short-term use indicators in-and-of-themselves do not explain the current state or the vegetation community or the causation of change from the desired plant community. To determine potential causation, short-term use indicators are evaluated within the context of long-term objectives and trend, which also accounts for temporal variability. When a use is identified as a causal factor, adjustments should be made to that use to move the vegetation towards the desired condition.

When completing grazing permit renewals, the BLM process will continue to use rangeland health standards, monitoring data, and associated tools and protocols, e.g., Indicators of Rangeland Health. In general, the land health standard for Special Status Species (SSS) directs BLM to meet the habitat objectives for the specific species present. When evaluating areas containing habitat for SSS or Threatened and Endangered (T&E) species, habitat objectives specified in the land use plan (e.g., Sage-Grouse habitat objectives table) should be used. For species not addressed in a land use plan, habitat objectives should be developed. When pertinent, habitat objectives should be adjusted based on the ecological site potential and the desired condition.

The ecological potential of a site is informed from an Ecological Site Description, associated State and Transition Models, and other pertinent data used to complete a Reference Sheet as described in *Interpreting Indicators of Rangeland Health* (M. Pellant, et. al., 2005). If an Ecological Site Description or associated State and Transition Model are not available, the above reference describes a process to identify an existing Ecological Site Description that is suitable for the soil, moisture, aspect, and slope of the site in question. If no comparable or suitable Ecological Site Description is located, the above reference also describes the process to develop a Reference Sheet in the absence of an Ecological Site Description.