



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

September 21, 2012

Richard Vander Voet, Field Manager  
Bureau of Land Management  
Wind River/Bighorn Basin District  
Lander Field Office  
1335 Main Street  
Lander, WY 82520

Dear Mr. Vander Voet:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the request for scoping comments for the Environmental Assessment (EA) for the purpose of analyzing grazing management in the Bridger Mountain area in the Lander Field Office (LFO) of the Bureau of Land Management (BLM).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed EA 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 supports the continuation of livestock grazing on all nineteen allotments. We encourage a discussion of the importance of using livestock as a tool to achieve natural resource objectives, such as improving wildlife habitat (Anderson and Scherzinger 1975<sup>1</sup>, Derner et al. 2009<sup>2</sup>, Severson 1990<sup>3</sup>). Furthermore, we support the use and development of range improvement projects to achieve healthy rangelands for the benefit of both livestock and wildlife.

The WDA does not support the selection of a no grazing alternative. Selection of such an alternative would have negative and significant consequences on vegetative resources, wildlife habitat, and the local economy. Further, it is clear that livestock grazing is authorized under the current LFO Resource Management Plan.

Management prescriptions in the EA must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM-administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing needs to be specifically noted. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and

<sup>1</sup> Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. *Journal of Range Management*. 28:120-125.

<sup>2</sup> Derner, J. D., W. K. Lauenroth, P. Stapp, and D. J. Augustine. 2009. Livestock as ecosystem engineers for grassland bird habitat in the Western Great Plains of North America. *Rangeland Ecology and Management*. 62:111-118.

<sup>3</sup> Severson, K. E. 1990. Summary: Livestock grazing as a wildlife management tool. *In: Can livestock be used as a tool to enhance wildlife habitat. General Technical Report. RM-194 p. 3-6. U. S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.*

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domestic animals...” Many in the public are unaware of this Congressional policy. Yet this policy is critical to the continuance of livestock grazing on public lands and should be expressed in this assessment.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the EA. In addition to its economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EA.

The WDA strongly recommends the use of on-the-ground monitoring to determine if and when changes to livestock grazing management are needed. Any inclusion of monitoring data in the EA will serve to strengthen the document as well as future Decisions and management.

Decisions in the proposed plan must allow LFO officials, grazing permittees and private landowners the opportunity to work cooperatively. This EA should also allow flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

We strongly encourage LFO staff to work closely and consistently with all affected grazing permittees. Agriculture producers are intimately familiar with areas affected by this EA and possess irreplaceable long-term, on-the-ground knowledge. We highly recommend LFO officials seek and address the concerns and recommendations of these producers. Moreover, it is imperative that LFO officials continuously inform all livestock grazing permittees who are directly or indirectly affected by this EA of the associated issues, decisions, and resulting actions regarding this proposal.

In conclusion, the WDA supports the continuance of commercial livestock grazing on each of the allotments in the Bridger Mountain area. We appreciate the opportunity to comment on the scope of the proposed EA. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough  
Director

JF/jc

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

Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
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