

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.



Dave Freudenthal, Governor
Jason Fearnough, Director

May 20, 2009

Chuck Otto, Field Manager
Pinedale Field Office
Bureau of Land Management
P.O. Box 768
Pinedale, WY 82941

Dear Mr. Otto:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to prepare an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) for the Boulder Landscape Plan (Plan). The Plan proposes to analyze the identified landscape for healthy rangelands, livestock grazing permit renewals, along with other resources for the Plan area.

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 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 making planning and management decisions on a landscape scale. The Plan appears to streamline the permit renewal process, along with providing an avenue to identify and analyze rangeland improvement projects. However, due to many unknowns of the landscape scale approach, the WDA has the following concerns.

A concern we have is when looking at the larger landscape scale, instead of an individual allotment, individual permittee and allotment management needs may be overlooked. We strongly encourage the Pinedale Field Office (PFO) work extremely close with all permittees associated with the Plan area throughout the entire EA process. This entails incorporating annual meetings to discuss grazing plans and rangeland improvement projects for the upcoming year for the life of the Plan.

It is our understanding the majority of permittees have a good working relationship with the Rangeland Specialist in the PFO. However, those permittees lacking a formal allotment management plan may unintentionally be overlooked. The Plan, as currently described, will act as a Programmatic Agreement for rangeland and habitat improvement projects. Those permittees without a formal plan must have their concerns and specific needs addressed in this process. The PFO must "beat the brush" with all permittees to identify the full range of potential rangeland projects.

With this in mind, management prescriptions in the analysis 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 in the environmental document. FLPMA Sec. 102(8) states "The Congress

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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 domestic animals..." Many in the public are unaware of this Congressional policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The PFO needs to include impacts on this economic activity in the analysis. We urge PFO officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of Agriculture, who conducted several studies showing how federal policies impact agriculture throughout the state. The studies include the importance of Animal Unit Months, the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. Changes affecting the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture must be included in the analysis.

The WDA has a concern with the relatively short timeframe to complete the Plan/EA. It is our understanding the completion of the EA is planned for the fall of 2009. However, the full analysis of the entire landscape has only partially begun. We urge the PFO to base its decisions on science, long term monitoring data and real data collected in the field. Permittees possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EA must include (1) the positive effects livestock grazing has upon the environment, and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Resource Management Plan. Producers are particularly aware of how impacts will affect rangeland health, habitat and forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound.

It was mentioned during our cooperators meeting entertaining the idea of third party monitoring. The WDA does not support the use or acceptance of third party monitoring. We encourage the PFO work towards building joint cooperative monitoring with the permittees, or develop a Memorandum of Agreement with the local Conservation District to cooperatively monitor rangeland health within the Plan area.

The WDA does not support the evaluation of a "No Grazing Alternative" in the EA. Livestock grazing has already been analyzed and approved in the Resource Management Plan (2008). The PFO decisions made in the Plan should be based on a case-by-case basis and supported with peer-

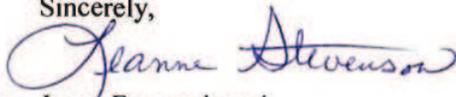
reviewed science. The analysis needs to identify the science supporting the decisions and discussions be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims. In addition, we would encourage the Plan to have enough flexibility to change and adapt with new technologies and changes within high development areas adjacent to the Plan area.

It is vital BLM evaluate all resources at the same level to ensure they are managed cumulatively. For example, the travel management plan must include how it relates to livestock grazing operations and adjacent gas field development operations. More importantly, the Plan needs to look outside the landscape boundary lines and make sure it considers adjacent activities in this planning effort.

Finally, the landscape scale plan is very similar to a WDA Coordinated Resource Management (CRM) program. CRM is a stakeholder consensus decision-making process. The coalition-driven process would potentially include landowners, the Sublette County Conservation District, UW Cooperative Extension, Wyoming Game and Fish Department and the PFO, all working together to manage the resources. The WDA already discussed the CRM with a Sublette County Commissioner regarding this Plan, and would like to pursue this process with the PFO.

We support the landscape scale planning effort, along with the continuance of commercial livestock grazing on the 21-grazing allotments. We appreciate the opportunity to comment on the scope of the EA. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,


for Jason Fearneyhough
Director

JF/cw

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