



Matthew H. Mead, *Governor*  
Jason Fearneyhough, *Director*  
2219 Carey Ave. • Cheyenne, WY 82002  
Phone: (307) 777-7321 • Fax: (307) 777-6593  
Web: agriculture.wy.gov • Email: wda1@state.wy.us

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

March 8, 2011

Duane Spencer, Field Manager  
Bureau of Land Management, Buffalo Field Office  
1425 Fort Street  
Buffalo, WY 82834-2436

Dear Mr. Spencer:

Following are the Wyoming Department of Agriculture (WDA) comments pertaining to the Draft Environmental Assessments (EAs) and associated 10-year Term Grazing Lease Transfer and Issuance for the Cross H Creek (#22206), Encres Draw (#12067), Forest Tract (#12045), Little Poison (#32007), Prong (02350), Robinson Draw (#22205), Rozet (#02263) and Wild Horse Creek (#32015) allotments by the Bureau of Land Management (BLM) Buffalo Field Office (FO).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As these EAs affect 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 the opportunity to express pertinent issues and concerns.

The WDA supports Alternative B (Proposed Action), which transfers grazing privileges to new base property owners and issues new 10-year term grazing leases. Alternative B also proposes to keep the total number of Animal Unit Months (AUMs) the same. WDA supports this proposal to maintain grazing preference.

We do not support Alternative A, which eliminates livestock grazing and removes the preference from the grazing base. As the EAs clearly state, livestock grazing on each allotment is an approved activity in the Buffalo Resource Management Plan. Alternative A would cause negative impacts to livestock producers if adjacent private lands were fenced. Choosing such an alternative would have significant negative consequences on livestock grazing permittees, vegetative resources, wildlife habitat, and the local economy.

The WDA offers the following specific comments to the document:

#### 4.1.4 Wildlife – Alternative B:

Adding references to this section will strengthen the document. We recommend using Derner et al. (2009<sup>1</sup>) which showcases the use of livestock as a tool to improve wildlife habitat, specifically grassland birds.

#### 4.1.4.1 Candidate Species – Alternative A:

The WDA agrees that exclusion of livestock does not always cause an area to return to a previous ecological condition. We recommend using Ecological Site Descriptions (ESDs) as a reference for this discussion, as most ESDs indicate the removal of livestock grazing will not change vegetation from its current state to another, more desirable state. There

<sup>1</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. *Journal of Rangeland Ecology & Management* 62:111-118.

### *Equal Opportunity in Employment and Services*

#### **BOARD MEMBERS**

Vacant, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*  
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

#### **YOUTH BOARD MEMBERS**

Patrick Zimmerer, *Southeast* • Dalin Winters, *Northwest* • John Hansen, *Southwest* • Bridget Williams, *Northeast*

Draft Environmental Assessments  
Buffalo Field Office  
3/8/2011  
Page 2 of 2

has also been research indicating that excluding livestock grazing from an area does not guarantee an improvement in species richness, species diversity, net primary production or other vegetative components (Manier and Hobbs 2007<sup>2</sup>).

Peer-reviewed science and monitoring data should underlie decisions made. The EAs utilize science to support the decisions and discussions regarding the continuation of livestock grazing on the allotments. The WDA appreciates the effort of the Buffalo FO to include peer-reviewed science.

In conclusion, the WDA supports the continuance of livestock grazing on the eight allotments. We appreciate the opportunity to comment on the scope of the proposed EAs. 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 Planning Office  
Rocky Mountain Farmer's Union  
Wyoming Association of Conservation Districts  
Wyoming Board of Agriculture  
Wyoming Farm Bureau Federation  
Wyoming Game and Fish Department

---

<sup>2</sup> Manier, D. J. and N. T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: Livestock and wild ungulates influence structure and function. *Oecologia*. 152:739-750.