



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

March 21, 2011

Rubel Vigil, Jr., Acting Field Manager
Bureau of Land Management, Wind River/Bighorn Basin District
Lander Field Office
1335 Main Street
Lander, WY 82520

Dear Mr. Vigil:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the revised Green Mountain Common Allotment (GMCA) Environmental Assessment (EA) by the Bureau of Land Management (BLM) Lander 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 this revised 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 the opportunity to express pertinent issues and concerns.

The WDA strongly supports the continuation of livestock grazing and the proposed range improvements as detailed in Alternative Two (Proposed Action). Alternative Two offers the best opportunities for sustainable, long-term livestock grazing to continue on the GMCA. The proposed range improvements are pertinent for successful livestock grazing management on the GMCA. However, the revised EA does not clearly outline timelines to accomplish reconstructing or building range improvement projects. The WDA strongly recommends the BLM include a timeline for completion of range improvements and diligently works to meet deadlines set in the timeline. It is imperative the EA holds BLM and grazing permittees accountable for completing range improvements and implementing livestock grazing management practices.

The WDA believes more water development projects may be needed than those proposed in the revised EA. Despite the development of 14 springs, wells and reservoirs, there are vast areas of the GMCA needing water developments, such as the Eagles Nest Pasture.

The WDA does not support net losses of Animal Unit Months (AUMs). We are concerned the proposed decrease in permitted AUMs reduces flexibility of future management. Permitted AUMs should remain at a higher level than 26,476. We understand that the full permitted use has not been used since 1980, but a 44% reduction in permitted use is too extreme. The construction of carefully planned range improvements and implementation of the proposed action should improve resources and Rangeland

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Health Standards (RHS) should be met. As resources improve, it is possible to increase AUMs. The proposed action eliminates this opportunity and flexibility.

Currently, there is not an alternative analyzing a higher use level than the proposed action. This is, as stated above, an issue in flexibility. In order to authorize a higher number of AUMs as resources improve and resource objectives are met, the EA must include an analysis of higher AUMs.

We do not support Alternative Three (No Grazing Alternative). Livestock grazing on the GMCA is an approved activity in the Lander Resource Management Plan (1987). Alternative 3 would cause negative impacts if adjacent private and state lands were fenced. Choosing this 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:

Alternatives Analyzed in Detail, Introduction, page 2-7 and Table 2-1, page 2-19

The revised EA states "During emergency conditions...the BLM would close pastures, regions, or the entire allotment to livestock grazing..." This statement eliminates all flexibility in livestock grazing management for emergency conditions. Flexibility is crucial to the health of rangelands and the economic viability of permittees. We strongly recommend the BLM change the sentence to "*During emergency conditions...the BLM will evaluate affected areas and work with livestock grazing permittees to implement appropriate livestock grazing management.*"

Table 2-1. Summary of Management Actions, Assumptions and Mitigation by Alternative, page 2-18

The third action on this page currently states "BLM will encourage a cooperative monitoring effort with the active participation of the interested public." The BLM should encourage cooperative monitoring with livestock grazing permittees and this must be entered into this action.

Alternative Two (Proposed Action), Stubble Height Standards & Monitoring & Evaluation, page 2-25

"The approach puts the emphasis on the evaluation process rather than strict adherence to the stubble heights, and a move-on-use mode of operation." The WDA agrees that evaluating stubble heights, in addition to other monitoring efforts, is a more efficient and useful method than a move-on-use method.

Effects on Vegetation Resources (Alt. One), Summary of Impacts, page 4-7

The Summary of Impacts indicates a substantial reduction in AUMs would "moderately increase vegetation production." However, the Upland Vegetation section states "The majority of the upland rangeland met the RHS." It is unlikely the reduction of AUMs will cause a real improvement in uplands, especially if those uplands are already meeting RHS under current management and after a drought period.

Effects on Wildlife/Fisheries Habitat and Special Status Species (Alt. One), Big Game, page 4-9

The EA states that cattle often select forbs when they are actively growing. This statement is incorrect. While cattle may consume some forb species, they do not actively select for forbs. Cattle generally

prefer grass and select forbs only when grass is unavailable (Holechek et al. 2001¹). We suggest removing this statement.

Effects on Vegetation Resource (Alt. Three), Vegetation – General, page 4-33

The McLean and Tisdale (1972) reference cited in this discussion is not fully applicable to the GMCA. It is inappropriate to state it will take 40 years for the GMCA to move from poor condition to a more desirable condition based on this reference for two reasons: 1) The reference provided is based on research done in ponderosa pine/rough fescue vegetation types, which are not largely found in the GMCA and 2) The GMCA is in not poor condition overall and stating it will take 40 years to move from poor to good condition if livestock are removed suggests the allotment is in poor condition. There 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 2007²).

In addition, Table 4-9 is referenced but there is no Table 4-9 in the EA.

Effects on Livestock Grazing (Alt Three), page 4-33

The statement that the elimination of grazing “probably would not cause any of the operators to go out of business...” is incorrect and must be removed. It is impossible to predict which operators may or may not go out of business or what will happen to their private property. However, it is highly likely some operators will go out of business if livestock grazing is removed from the GMCA.

Effects on Wildlife/Fisheries Habitat and Special Status Species (Alt. Three), page 4-36

The special status species section states that removal of livestock grazing from the GMCA would remove the “threat or likelihood of trampling or disturbance of the nests of sensitive ground-nesting or shrub-nesting bird species...” This statement is incorrect as nests may still be disturbed or trampled by wild horses, wildlife and recreationists.

Effects on Wildlife/Fisheries Habitat and Special Status Species (Alt. Two), Big Game, page 4-25

This section of the EA should discuss the benefits of livestock grazing management on elk forage and habitat. Anderson and Scherzinger (1975³) and Clark et al. (2000⁴) discuss the importance of using livestock grazing to improve forage quality for elk.

Appendix 15, GMCA Grazing Preference Summary (2/14/11)

The WDA recommends adding a brief explanation to this table to explain where the information provided originates from and what the table is depicting.

¹ Holechek, J. L., R. D. Pieper and C. H. Herbel. 2001. Range Management Principles and Practices: Fourth Edition. (pp. 333). Upper Saddle River, New Jersey 07458: Prentice Hall.

² 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.

³ 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.

⁴ Clark, P. E., W. C. Krueger, L. D. Bryant, and D. R. Thomas. 2000. Livestock grazing effects on forage quality of elk winter range. *Journal of Range Management*. 53:97-105.

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In conclusion, the WDA supports the continuance of commercial livestock grazing on the Green Mountain Common Allotment. 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
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