

Wyoming Department of Agriculture

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Wyoming Department of Agriculture

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

March 12, 2009

John Christensen, Field Manager
Kemmerer Field Office
Bureau of Land Management
312 Highway 189 North
Kemmerer, WY 83101

Dear Mr. Christensen:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the re-analyzing of ten livestock grazing allotments for their 10-year permit renewal located within the Kemmerer Field Office (FO) 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 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 proposed action intends to analyze the current grazing permit with no new restriction, along with analyzing the closing of the allotments to livestock grazing. Changes to any of the allotments will significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the project area. The WDA requests the Kemmerer FO analyze the following impacts.

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) about livestock grazing, needs to be specifically noted in the environmental document. 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 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 Kemmerer FO needs to include impacts on this economic activity in the analysis. We urge Kemmerer FO 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 (AUMs), the significance of input

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and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Sheep and cattle have grazed on these allotments for over 100 years. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, visual beauty, 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 should be included by the Kemmerer FO in the scope of the analysis.

The WDA appreciates the efforts of the Kemmerer FO staff in working with interested permittees and strongly urge this practice continues with all permittees located within the ten allotments. We encourage Kemmerer FO officials to work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. Producers are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock 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. Thus, we strongly recommend Kemmerer FO officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring grazing permittees who are directly affected by this plan receive all notices about this renewal.

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 environmental document and analysis needs to 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 Kemmerer Resource Management Plan (RMP).

We must remember that livestock grazing is an approved activity in the existing Kemmerer RMP and the newly Proposed RMP and Final Environmental Impact Statement. The Kemmerer FO decisions made in the proposed action 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 and be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims.

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The WDA does not support the idea of evaluating the ten separate allotments as an “all or nothing” endeavor. The National Environmental Policy Act of 1969 (NEPA) requires that all reasonable alternatives be evaluated, however, we do not believe the no grazing alternative is a reasonable alternative since the existing and revised Kemmerer RMP states that reductions, limitations or actions that prohibit livestock grazing is considered an adverse impact. It is important the Kemmerer FO analyze potential identified issues in the analysis on a case-by-case basis while considering all the potential causal factors associated with a potential issue, rather than isolating or focusing on just livestock grazing.

We support the continuance of commercial livestock grazing on the ten allotments. We appreciate the opportunity to comment on the scope of the proposed action. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



John Etchepare
Director

JE/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
Wyoming Association of Conservation Districts
State Grazing Board