



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

June 29, 2010

Mike Phillips, Assistant Field Manager-Resources  
Bureau of Land Management, Worland Field Office  
PO Box 119  
Worland, WY 82401

Dear Mr. Phillips:

Following are the Wyoming Department of Agriculture (WDA) comments pertaining to the Environmental Assessment (EA) and associated livestock grazing permit transfer for the North Grass Creek Allotment No. 00621 by the Bureau of Land Management (BLM) Worland 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 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 supports Alternative 2, which issues the grazing permit with modifications. Alternative 2 includes a change in season-of-use to winter, which will benefit the producer and the vegetative resource in the allotment. WDA supports the changes made as suggested by the applicant.

We do not support Alternative 3, which eliminates livestock grazing and removes the preference from the grazing base. As the EA clearly states, livestock grazing on the North Grass Creek Allotment is an approved activity in the Grass Creek Resource Management Plan. In addition, monitoring data presented by the BLM shows range conditions are meeting rangeland health standards and vegetative conditions are optimal. Choosing Alternative 3 would have significant negative consequences on livestock grazing permittees, vegetative resources, wildlife habitat, and the local economy.

The WDA offers the following specific comment to the document:

**4.3.3 Alternative 3 – Vegetation/Range**

The Vegetation/Range discussion in the EA presents the idea that removing livestock grazing may improve rangeland upland conditions at a faster rate than other alternatives. However, the Ecological Site Descriptions (ESDs) for this area do not indicate the removal of livestock grazing will change vegetation from its current state to another, more desirable state (site ID R032XY322WY). Manier and Hobbs (2007<sup>1</sup>) indicated that excluding livestock grazing from an area does not guarantee an improvement in species richness, species diversity, net primary production or other vegetative components.

<sup>1</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.

**BOARD MEMBERS**

Juan Reyes, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • Jim Bennage, *District 4* • Joe Thomas, *District 5*  
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

**YOUTH BOARD MEMBERS**

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

In addition, peer-reviewed science and monitoring data should underlie decisions made. The data presented in the EA strengthens the decision to continue livestock grazing on the allotment. The EA needs to identify the science supporting the decisions and discussions regarding the continuation of livestock grazing on the allotments.

The WDA appreciates the efforts of the Worland FO staff in working with permittees to develop livestock management practices in this allotment and strongly urge them to continue this practice.

In conclusion, the WDA supports the continuance of commercial livestock grazing on the North Grass Creek 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,

A handwritten signature in blue ink that reads "Jason Fearneyhough". The signature is written in a cursive style.

Jason Fearneyhough  
Director

JF/jc

CC: Governor's Planning Office  
LU Sheep Company, c/o Mike Healy  
Rocky Mountain Farmer's Union  
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  
Wyoming Wool Growers Association