



Wyoming
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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.

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BLM Wyoming State Office
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To Whom It May Concern:

Following are the Wyoming Department of Agriculture's (WDA) scoping comments for the Resource Management Plan Revision and Environmental Impact Statement (EIS) Amendments (Amendment) for the Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rocksprings Bureau of Land Management (BLM) Field Offices.

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 Amendment affects our agriculture industry, our natural resources, and the welfare of our citizens, it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

With management direction of approximately 15 million acres of public land, this Amendment will undeniably affect grazing permittees, agriculture producers, landowners and other citizens, as well as our natural resources, over a large area of Wyoming. Officials need to consider these effects: direct, indirect, cumulative, economic, social, and environmental.

Active collaboration between local cooperators, state cooperators, and BLM officials is key to successful planning and preparation of the Amendment. We appreciate the meetings BLM personnel have already hosted and encourage a continuance of cooperating agency meetings. These meetings allow cooperators to discuss and have a shared knowledge of Amendment objectives, concerns, existing conditions, and desired conditions. They also help build a confidence in and support for the Amendment. We request meetings of cooperators to help develop goals, objectives, management actions, alternatives, and Draft and Final EIS documents.

The Amendment should allow BLM officials and grazing permittees the opportunity to work cooperatively and provide flexibility in making case-by-case decisions in the best interests of affected natural resources and area citizens. Planning criteria needs to include an objective ensuring management decisions are complimentary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and decisions reflected in the Amendment will critically impact landowners operations and planned livestock grazing management on

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these lands. For this reason, BLM officials need to make every effort to ensure their decisions regarding this Amendment are complimentary to adjoining properties.

Decisions affecting livestock grazing and other resource uses in the planning area will have significant direct impacts affecting grazing permittees. We encourage BLM officials to work with all grazing permittees and agriculture producers affected by this Amendment and learn their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. They are particularly aware of impacts this Amendment will have on rangeland health, wildlife habitat, and livestock forage and can offer environmentally and economically sound recommendations. Thus, we strongly recommend BLM officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring all grazing permittees directly affected by this plan receive all notices about this Amendment.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the study. We urge BLM officials to coordinate with the Department of Agricultural and Applied Economics located in the University of Wyoming, College of Agriculture. They have conducted several studies about the impact of policy upon agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. This Amendment will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area and these evaluations of economic impacts upon agriculture need to be included in the EIS.

In addition to its economic significance, livestock grazing provides irreplaceable environmental and social values. These values contribute 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 to users and visitors of the area and residents of impacted communities should be included in the scope of the EIS.

For several decades, BLM officials and grazing permittees have been working to improve rangeland health through the management of livestock grazing. The Amendment needs to adequately reflect these efforts. Range improvements, annual operating instructions, allotment management plans, monitoring, and other livestock grazing management tools have moved rangelands on these lands in a positive direction. The EIS chapters on affected environment and environmental consequences should acknowledge these efforts and improvements.

Livestock grazing is permitted on BLM lands and it is important that the sections of the EIS discussing livestock grazing specifically discuss *livestock grazing management*, just as the section on wildlife deals specifically with wildlife management. Livestock grazing must meet the provisions of grazing permits, allotment management plans and annual operating instructions. Thus, livestock grazing on federal lands

within the planning area is managed. The desired effects are the result of agreed upon management practices of BLM officials and grazing permittees. For these reasons, the Amendment needs to address effects, goals, objectives and management actions of livestock grazing management, and not the actual act of livestock grazing.

Livestock grazing is an important tool used to enhance and sustain rangeland health. In Chapter Two of the EIS, which includes the goals, objectives, and management actions of the various resource values included in the Amendment, it is essential these goals, objectives and management actions for livestock grazing management include the *promotion* of livestock grazing management. This is a stark contrast to the belief that livestock grazing management exists only to promote all other resource values. Chapter Two should be written with the understanding that livestock grazing is an important resource value in and of itself.

In addition, this EIS should not single out the effects of livestock grazing on other resource values when other resource users create identical or similar impacts. All resource uses which affect another resource under study should be included. For example, it is essential neither wildlife nor livestock be spotlighted for credit or blame when both are responsible.

It is our understanding the Amendment will examine how proposed management of Greater sage-grouse will affect other resource values and uses. Often, the effects livestock grazing has upon other uses are focused on and the impacts of those uses upon livestock grazing management, forage availability and grazing permittees are overlooked. Planning needs to include the effects Greater sage-grouse management has upon livestock grazing management.

Management prescriptions in the Amendment must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM-administered lands. WDA particularly believes BLM should specifically include the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing in the Amendment. 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...” Through experience we have learned many in the public are unaware of this Congressional policy. Yet that policy is critical to livestock grazing in planning area. It is critical that FLPMA is expressed in the Amendment.

Glossary definitions are extremely important to the actual uses and meanings of those defined terms in the Amendment. The definition for surface disturbance is particularly significant for livestock grazing. Overly broad definitions create unintended consequences. WDA recommends planners and cooperators utilize and evaluate the “surface-disturbing activity” definition in the Casper BLM EIS/RMP. We also ask that care is taken when developing definitions for “wildlife disturbing activity,” “disruptive activity” and similar terms.

The Notice of Intent states that planning criteria will include Wyoming IMs 2010-012 and 2010-013, the Wyoming Governor's Executive Order (WY EO 2008-2) and the BLM National Sage-Grouse Habitat Conservation Strategy (Nov. 2004). The WDA strongly recommends that planning criteria also includes information from Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-grouse Habitat (Cagney et al. 2010), and recommendations developed by Local Sage-Grouse Working Groups and the forthcoming Great Sage-Grouse Programmatic CCAA for Wyoming Ranch Management. In addition, peer-reviewed science and solid monitoring data should underlie decisions. The Amendment needs to identify the science supporting the discussions, decisions and actions.

In conclusion, we appreciate the opportunity to comment on the scope of the Amendment. We encourage continued attention to our concerns and look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough

Director

JF/jc/cw

CC: Governor's Planning Office
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Kemmerer Field Office
Newcastle Field Office
Pinedale Field Office
Rawlins Field Office
Rocksprings Field Office
Wyoming Game and Fish Department
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming State Grazing Board