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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.

March 28, 2011

Rock Springs RMP Revision
Attn: Ms. Vera-Lynn Harrison, RMP Project Manager
Bureau of Land Management
Rock Springs Field Office
280 Hwy 191 North
Rock Springs, Wyoming 82901

Dear Ms. Harrison:

Following are the Wyoming Department of Agriculture's (WDA) scoping comments for the Rock Springs Resource Management Plan Revision (RMP) and Environmental Impact Statement (EIS) for the Bureau of Land Management (BLM) Rock Springs Field Office (RSFO).

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 RMP/EIS will affect our agriculture industry, our natural resources, and the welfare of our citizens, it's important we be kept informed of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

With management direction of approximately 3.6-million surface acres and 3.5-million acres of federal mineral estate, this plan will undeniably affect grazing permittees, agriculture producers, landowners, local and state economies, and citizens of Wyoming as well as our natural resources. BLM officials need to consider direct, indirect, cumulative, economic, social, and environmental effects to these issues.

Multiple Use

Management prescriptions in the RMP must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM-administered lands. These should be an integral part of the RMP. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing needs to be specifically noted in the RMP. 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..." We have learned through experience in working on previous RMP revisions that many in the public are unaware of this Congressional policy. Yet this policy is critical to the continuation of livestock grazing in the planning area. It is critical FLPMA is expressed in the RMP.

No Grazing Alternative

The RMP should not consider a 'No Grazing Alternative.' An alternative proposing to close the entire planning area to grazing is inconsistent with the Taylor Grazing Act, which directs the BLM to provide for livestock use of BLM lands and to provide for the orderly use, improvement, and development of the rangelands. In addition, FLPMA requires public lands be managed on a "multiple use and sustained yield basis" (FLPMA Sec. 302(a) and Sec. 102(7)) and includes livestock grazing as a principal or major use of

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public lands. The WDA strongly encourages the RSFO officials to not analyze any comments or alternatives suggesting the removal of livestock grazing from the planning area.

Wild Horses

The WDA supports active management of wild horses within the planning area and in accordance to the Consent Decree dated August 14, 2003 between the State of Wyoming and the U.S. Department of the Interior and BLM. This includes removing excess horses from Herd Management Areas (HMAs) and adjacent public/private lands using selective removal strategy, managing the herd to the Appropriate Management Level (AML), collecting wild horse data (census) for appropriate future herd management, and administering fertility treatments. The gathering of wild horses ensures a natural ecological balance to the land and provides for the protection of rangeland resources. We do not support the expansion of HMAs boundaries in the RSFO or increasing the AML to accommodate more horses. BLM must work closely with private landowners to utilize their knowledge of the land and identify locations of wild horses at the time of the gather. Impacts created by wild horse populations to all resources must be documented and fully analyzed in the planning process.

Checkerboard

The decisions BLM makes in the RMP must acknowledge the large amount of "Checkerboard" land pattern in the RSFO planning area. The WDA encourages the RSFO officials ensure RMP decisions only pertain to public lands and acknowledge proposed actions and decisions will have significant direct impacts on livestock grazing permittees and the potential to negatively impact private landowners in the "Checkerboard" section of the RSFO. In addition, indirect impacts of the RMP will affect not only permittees, but also local communities throughout the planning area and Wyoming as a whole.

Cooperation

Active collaboration between local cooperators, state cooperators, and BLM officials is key to the successful planning and preparation of the RSFO RMP. We appreciate the training opportunities RSFO officials have provided cooperators and encourage a continuation of cooperating agency meetings throughout the planning process. Cooperator meetings allow for the discussion and open sharing of plan objectives, concerns, existing conditions, and desired conditions. Cooperator meetings also build confidence in and support for the decisions made in the RMP. We request cooperator meetings occur as often as possible to help develop goals, objectives, management actions, alternatives, and Draft and Final EIS's.

The RMP should allow BLM officials and grazing permittees the opportunity to work cooperatively with flexibility to make the best case-by-case decisions in the best interests of affected natural resources and RSFO area citizens. Preliminary planning criteria should ensure BLM decisions are complimentary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and decisions reflected in the RMP will critically impact ranchers and landowners' operations and planned livestock grazing management on these lands, especially in the checkerboard area of the RSFO. For this reason, BLM officials need to make every effort to continue to ensure decisions regarding this RMP are complimentary to adjoining properties. This RMP and the RSFO officials need to actively coordinate with those responsible for making decisions on adjoining federal, state, and private lands.

We encourage BLM officials to work with grazing permittees and agriculture producers to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge and should be utilized to their full advantage. They are particularly aware of the impacts this RMP will have on rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of the lands 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 and ensure grazing permittees receive all open house meeting dates/times and notices regarding the RMP revision.

Socio-Economics

Grazing on public lands represents a vital economic value to agricultural producers and to local communities within the state and needs to be fully analyzed in the RMP. 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 regarding how policies impact 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. The RSFO RMP will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area. Evaluations of economic impacts upon agriculture need to be included in the RMP revision process.

In addition to economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland 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 analyzed in the RMP.

Livestock Grazing Management

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

Livestock grazing is permitted on BLM lands and it is very important the RMP/EIS does not discuss livestock grazing specifically but discusses *livestock grazing management* instead, just as the section on wildlife deals specifically with wildlife management. Livestock grazing management must meet provisions of grazing permits, allotment management plans, and annual operating instructions. The desired livestock grazing management outcomes are the result of agreed upon management practices between RSFO officials and grazing permittees. For these reasons, the RMP/EIS needs to address effects, goals, objectives, and management actions of livestock grazing management, as opposed to the narrow vision of just livestock grazing.

Livestock grazing is an important tool used to enhance and sustain rangeland health. Chapter Two of the EIS, includes the goals, objectives, and management actions of the various resource values. It is essential the goals, objectives, and management actions for livestock grazing management include the *promotion* of livestock grazing management. This is a contrast to the belief by many that livestock grazing management exists only to promote or mitigate for all other resource values. Chapter Two should be written with the understanding that livestock grazing is an important resource value in of itself, and can be utilized as an important tool to achieving desired conditions.

The RMP/EIS should not single out the impacts livestock grazing has on other resources, when in all reality numerous resources may be creating identical or similar impacts. All the impacts to a resource should be included without singling out any one specific resource. For example, livestock is often blamed for all browsing occurring on trees and shrubs, while browsing on trees and shrubs also occurs by moose, elk and deer. Do not isolate livestock as the only cause. In contrast, the impacts other resources have on livestock grazing and livestock grazing management are often overlooked. The repercussions of other uses upon livestock grazing, forage availability, and grazing permittees needs to be acknowledged and analyzed. Planning needs to include the effects of each use and resource has upon other uses and resources equally.

Energy Development

With the rapid increase of mineral and energy development occurring in the RSFO planning area, it is necessary to address the effects energy development activities have on natural resources and other resource uses. The WDA supports on-site and off-site mitigation for livestock grazing activities to lessen the burden, livestock stress, and economic impacts to grazing permittees. The RMP should address both on- and off-site mitigation. In addition, timely and successful reclamation following development is imperative. The revised RSFO RMP needs to address reclamation thoroughly in order to restore livestock and wildlife habitat.

Peer-Reviewed Science

Peer-reviewed science and best available data must underlie all decisions made in the RMP/EIS. The EIS must identify the site specific science and monitoring data supporting the decisions and discussions regarding this planning effort.

Air Emissions

At times, livestock grazing has been erroneously and unfairly characterized as a significant contributor to air emissions due to heavy construction activities and tailpipe emissions for transporting livestock. However, when estimates are computed correctly, the insignificance to air quality of these activities is minimal. We suggest this RMP omit this incorrect characterization as the Kemmerer RMP has done. In addition, methane gas from livestock has been characterized as a major contributor to greenhouse gases. However, the Intergovernmental Panel on Climate Change stresses these emissions vary based on the type of cattle, feed regime, productivity, and other factors¹. While consumption of beef increases in developing countries, the demand for beef rises. If livestock grazing were removed from public lands, cattle would likely be sent to feedlot operations sooner and more often. With this comes

¹ IPCC. 2000. IPCC Special Report on Emissions Scenarios. Cambridge University Press. Cambridge.

more development of agricultural land and a shift to a more grain-based diet causing a rise in methane gas production. For these reasons, we suggest the RSFO RMP omit mischaracterizations such as these.

Glossary

Glossary definitions are extremely important to the actual uses and meanings of those defined terms in the RMP. 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 provided in BLM

Information Bulletin No. WY-2007- 029. We also urge BLM to consider the definitions for "wildlife disturbing activity", "disruptive activity" and similar terms.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions. 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/cw

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
Wyoming State Grazing Board
Wyoming Stockgrowers Association
Wyoming Woolgrowers Association