



Wyoming
DEPARTMENT OF Agriculture

Matthew H. Mead, *Governor*
Jason Fearneyhough, *Director*
2219 Carey Ave. • Cheyenne, WY 82002
Phone: (307) 777-7321 • Fax: (307) 777-6593
Web: agriculture.wy.gov • Email: wda1@state.wy.us

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

June 15, 2011

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 Scoping Notice for the Slate Creek Allotment Management Plan (AMP) within the Kemmerer Field Office (KFO) 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 AMP and subsequent Permit Renewal 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.

Changes to the management of the allotment may significantly impact grazing permittees, agriculture producers, landowners, and other citizens, in addition to our natural resources, in and near the project area. The WDA requests the KFO analyze and consider the following impacts.

The WDA commends the KFO in opening the permit renewal and AMP process to the public to collect input and information from all interested publics. However, the KFO must make the best decision based on the information and assessments present for this allotment and not make decisions based on personal agendas or threats of litigation. We support a collaborative process and insist on ensuring the livestock grazing permittees are thoroughly involved in the development of the AMP and subsequent permit renewal. 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 serving as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound.

AMPs are critical for the proper management of allotments. However, all AMPs must be developed in conjunction with livestock grazing permittees, with the use of best available science, comprehensive monitoring data, and with management objectives defined for each allotment on a case-by-case basis, directing the allotment to desired conditions.

Equal Opportunity in Employment and Services

BOARD MEMBERS

Jana Ginter, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

YOUTH BOARD MEMBERS

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

The Slate Creek AMP must include the following:

- **Defined Management Objectives:** Identifying goals and objectives for an AMP is important to ensure the AMP has proper direction in accomplishing desired conditions. Objectives should be clearly stated and communicated with livestock grazing permittees. Permittees need to understand AMP goals in order to accomplish set objectives.
- **Management Action Plan:** The management action plan should include a grazing plan, monitoring plan, and improvement plan. These plans will outline the actual work needing to occur on the allotment. These plans should support the objectives.
 - **Grazing Plan:** The grazing plan should be developed in collaboration with livestock grazing permittees.
 - **Monitoring Plan:** The monitoring plan should be developed with livestock grazing permittees. The monitoring plan should develop management objectives, review existing monitoring information, include the discussion of location of monitoring sites, key areas, indicator species, etc.
 - **Improvement Plan:** Improvement plans should identify range improvement projects identified to assist the allotment in reaching its objectives. Each improvement action should be adequately monitored to assess the result of the project implementation.
- **Issues of Concern Identified:** The issues of concern on the allotment must be identified and supported by monitoring or data. Identified issues should be evaluated for causal factors. These issues and causal factors need to be communicated to livestock grazing permittees. It is our understanding elk numbers greatly exceed objectives and are causing harm to resources on the allotment. Monitoring and management plans should identify this issue, develop causal factors and develop proper monitoring methods/plans and management plans to address the issue.
- **Agreement on Final AMP:** An agreement with livestock grazing permittees must occur on all items included or not included in the AMP. This ensures all parties have the same understanding on how the allotment will be managed.

The WDA would like the KFO consider the use of a Technical Review Team (TRT) to assist the livestock grazing permittees and BLM in evaluating the allotment and as a result develop collaborative strategies for management decisions. TRTs will provide an unbiased evaluation based on existing information on the allotment, current management practices, and a thorough on-the-ground review of the allotment. This program is voluntary and could provide defensible assessment and information for the AMP and permit renewal process.

Kemmerer Field Office
Bureau of Land Management
Slate Creek Allotment Management Plan
6/15/10
Page 3

The WDA wishes to directly participate in the development of the Slate Creek AMP, the Environmental Assessment and permit renewal. We are attaching the Slate Creek Allotment Management Plan Public Interest Response Form and several copies of the Technical Review Team flyer (Resolving Grazing Disputes with Science).

The WDA supports the continuance of commercial livestock grazing on the Slate Creek allotment. 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,

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

Jason Fearneyhough
Director

JF/cw

CC: Governor's Policy 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
Wyoming State Grazing Board