



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

April 26, 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 permit renewals for the Vass Allotment No. 00608 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 grazing permits with modifications. Alternative 2 also proposes to keep the total number of Animal Unit Months (AUMs) the same. WDA supports this proposal to maintain grazing preference.

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 Vass Allotment is an approved activity in the Grass Creek Resource Management Plan. In addition, monitoring data presented by the BLM shows that range conditions are meeting rangeland health standards and vegetative conditions are optimal. Alternative 3 would cause negative impacts if adjacent private land were fenced and if water sources were cut off. Choosing such an alternative would have significant negative consequences on livestock grazing permittees, vegetative resources, wildlife habitat, and the local economy.

The WDA offers the following specific comments to the document:

4.2.1 Alternative 3 – Hydrology-Riparian/Vegetation

The discussion of the effects of removing livestock grazing on riparian areas is misleading. Removing livestock from the allotment will increase litter which will be beneficial in the short-term. However, the EA should discuss the impacts of excessive litter accumulation in the long-term and the impact this will have on vegetation. Over time, build-up of litter will begin to inhibit vegetative growth (Knapp and Seastedt 1986¹). In the discussion of litter, it is also important to note that not "all" plant material would accumulate as litter. Some plant material will still be used by wildlife and insects.

The riparian discussion in the EA presents the idea that removing livestock grazing may improve riparian and watershed 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. There has also been research indicating that excluding livestock grazing from an area does

¹ Knapp, A. K. and T. R. Seastedt. 1986. Detritus accumulation limits productivity of tallgrass prairie. *Bioscience*. 36:662-668.

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not guarantee an improvement in species richness, species diversity, net primary production or other vegetative components (Manier and Hobbs 2007²).

4.2.3 Alternative 3 – Wildlife

This section of the EA should discuss the benefits of livestock grazing management on elk forage and habitat. Anderson and Scherzinger (1975³) and Clark et al. (2000⁴) discuss the importance of using livestock grazing to improve forage quality for elk.

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 you to continue this practice.

In conclusion, the WDA supports the continuance of commercial livestock grazing on the Vass 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,



Jason Fearneyhough
Director

JF/jc

CC: Governor's Planning Office
Larry Bentley, Wyoming Department of Agriculture
Mac Vass
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

² 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.

³ Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. *Journal of Range Management*. 28:120-125.

⁴ Clark, P. E., W. C. Krueger, L. D. Bryant, and D. R. Thomas. 2000. Livestock grazing effects on forage quality of elk winter range. *Journal of Range Management*. 53:97-105.