



Wyoming  
DEPARTMENT OF *Agriculture*

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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.*

April 3, 2015

Shane DeForest  
Pinedale Field Manager  
BLM Field Office  
PO Box 768  
Pinedale, WY 82941

Dear Mr. DeForest,

Following are the Wyoming Department of Agriculture's (WDA) scoping comments pertaining to Pinedale Bureau of Land Management Field Office's (BLM) Notice of Exchange Proposal WYW-179564, Miller Mountain Land Exchange (Exchange).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe 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.

WDA supports private landowner's rights to make decisions which best suit their operational needs, including land exchanges. We offer the following concerns to include in the development of the range of alternatives in the future Environmental Analysis (EA).

We understand the Exchange covers three BLM field offices, multiple grazing allotments, and a number of grazing permittees, thus requiring a heightened effort to coordinate, collaborate, and communicate with everyone affected. The current Notice of Exchange lacks the specific language requesting comments for Scoping, perhaps causing confusion, and conveys the sense of urgency to provide formal comments prior to the development of alternatives. Additionally, the Notice lacks any specific detail regarding the number of grazing permittees impacted, directly or indirectly. We ask BLM to ensure all grazing permittees are not only aware of the Scoping, but also have ample opportunity to engage in the National Environmental Policy Act (NEPA) process.

WDA has had a number of conversations with BLM staff and impacted grazing permittees regarding the Exchange. We are genuinely concerned the land exchange process remains unclear. We are also concerned with how BLM will honor existing private grazing rights following the exchange. Current grazing permittees are operating their ranches under the assumption their current Animal Unit Months (AUMs) will transfer to a BLM grazing permit. However, BLM staff conveys the appropriation of the AUMs following the exchange will not occur until after the NEPA analysis and a field manager's decision. WDA insists BLM follows CFR: 4110.1-1: Acquired Lands:

*Equal Opportunity in Employment and Services*

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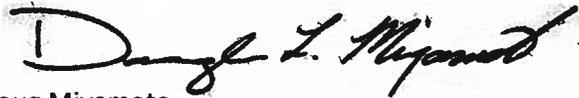
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*Where lands have been acquired by the Bureau of Land Management through purchase, exchange, Act of Congress or Executive Order, and an agreement or the terms of the act of Executive Order provide that the Bureau of Land Management shall honor existing grazing permits or leases, such permits or leases are governed by the terms and conditions in effect at the time of acquisition by the Bureau of Land Management, and are not subject to the requirements of 4110.1"*

WDA believes BLM's NEPA analysis should thoroughly identify and analyze the Socio Economic impacts of the Exchange on each permittee, all permittees combined, neighboring ranches, and the community. The AUMs currently leased on private lands, and appropriated in conjunction with existing BLM grazing permits, are crucial to the economic viability of individual livestock operators, the communities, and the counties.

WDA requests BLM utilize the Memorandum of Understanding with the State of Wyoming (BLM-MOU-WY-930-1501), to include WDA in planning, drafting, and analyzing the range of alternatives for the Draft Exchange EA. We look forward to working closely with BLM, cooperators, and grazing permittees in the near future.

Sincerely,



Doug Miyamoto

Director

DM/jw

CC: Jessica Crowder: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts  
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