



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.*

June 13, 2014

Bureau of Land Management  
Rock Springs Field Office  
Attn: Robert Price, Supervisory Rangeland Management Specialist  
280 Highway 191 North  
Rock Springs, WY 82901

Dear Mr. Price

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the scoping notice for developing a grazing management plan, modifying the existing grazing permit, and constructing multiple range improvement projects on Continental Peak allotment in the Rock Springs Field Office (RSFO).

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 proposal 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, including protests and appeals, and continue to provide us the opportunity to express pertinent issues and concerns.

WDA appreciates the efforts RSFO has shown in working with Continental Peak grazing permittees through the transfer and conversion of Animal Unit Months (AUMs), and most recently identifying site specific range improvement projects to ensure resource goals are met and a family ranching operation remains viable. We offer the following comments regarding the future Environmental Analysis and range of alternatives.

We believe BLM should not narrow the analysis to only electric fencing for proposed projects. Electric fence may or may not work for each of the projects and will limit the BLM and permittees' ability to make changes based upon suitability of fence type. We would recommend analyzing permanent wildlife friendly fences for each of the proposed projects to ensure the vegetation and management goals are met if the electric fence is inadequate. The scoping also states permittees are maintaining and funding the fence projects. We urge BLM to work closely with permittees and appropriate 8100 funding for fencing supplies whenever possible.

WDA asks for clarification regarding the proposed grazing plan. Mainly, will cattle always enter the allotment through the Long Slough pasture? The scoping notice only provides one set of dates which seems to imply the entry pasture will not change from year to year. We recommend maximum flexibility be retained in developing the grazing plan so objectives can be met every year and any adverse impacts to resources are avoided. This includes livestock entry and exit dates and locations.

BLM states the "uplands are functioning well," but does not indicate whether or not uplands are meeting Rangeland Health Assessment standards. We also request information regarding the plant communities and the BLM's goals for those communities.

We encourage BLM to provide information on riparian conditions and whether or not riparian areas are meeting Proper Functioning Condition (PFC). WDA supports installing gates to the enclosures to control timing and access of livestock grazing

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on riparian areas. Livestock grazing can play an important role in maintaining and restoring the health and integrity of riparian areas (Tate et al. 2006)<sup>1</sup> and should be utilized as a tool to meet PFC standards whenever and wherever possible.

We ask BLM to provide more specific information regarding sage-grouse leks and timing of use, habitat conditions, and any unforeseen or desired conditions. WDA recommends BLM include State of Wyoming Executive Order 2013-3 "Greater Sage-grouse Core Area-Grazing Adjustments" in the analysis as well as referencing the paper "Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-Grouse Habitat" (Cagney et. al 2010).<sup>2</sup> We also ask BLM include information on mule deer and antelope migration routes that may overlap with the allotment and influence woody species production and vigor.

Finally, we ask BLM to provide specific information regarding the utilization criteria, which states: "A total maximum grazing use level on current year's growth for key upland species would be set at 50%. For woody species a 35% maximum use level of stems bitten by livestock would be established." WDA requests a comprehensive list of "key upland species" and the BLM's rationale for choosing these species. Further, there is no method we are aware of differentiating woody species utilization between wildlife, wild horses and livestock. We insist the BLM provide a scientifically proven method for this task.

In conclusion, WDA supports the RSFO's efforts on Continental Peak allotment. BLM allotments are an integral part of agriculture across the State of Wyoming. It is important permittees continue livestock grazing on this allotment to assist in maintaining economic viability for both producers and communities. In addition, livestock grazing represents irreplaceable environmental and social values, contributing to the preservation of open spaces, scenic vistas, and the traditional image of historic rural landscapes of Wyoming. Maintaining open spaces also provides habitat and less restrictive movement for wildlife than alternative land uses.

Thank you for the opportunity to comment. If you have any questions please feel free to contact us.

Sincerely,



JF/J  
Jason Fearneyhough  
Director

JF/jw

CC: 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  
Wyoming Game and Fish Department

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<sup>1</sup> Tate, K.W., et al. "Confirmation of Riparian Friendly Grazing Project Results and Development of Achievable, Site Specific Reference Conditions for Grazed Riparian Areas." USDA Western Sustainable Agriculture Research and Education Program: Final Report. 2006

<sup>2</sup> Cagney, J., et al. "Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-Grouse Habitat." University of Wyoming Publication. 2010