



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

August 22, 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 Environmental Assessment (EA) for the Carter Lease Allotment 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 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 us the opportunity to express pertinent issues and concerns.

The WDA appreciates the KFO providing us the opportunity to review the EA prior to rendering a decision, however, 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 consider the following.

We commend the KFO for recognizing the social and economic impacts changes to an allotment may have on permittees, local landowners, local communities and to the state.

We recommend KFO address the following areas in the EA:

- The EA must emphasize the land ownership pattern in the allotment throughout each resource discussion. The BLM only manages 43% of the allotment, while the remaining 57% is owned by private landowners or the State of Wyoming. This is important because the BLM may not have the authority to make management decisions on all areas with resource issues or concerns.
- The EA makes several references to the Wyoming Game and Fish Department's (WGFD) concerns of understory conditions in the Carter Cedars area. The WGFD does not provide any data supporting their concerns or recognize the areas are located on private lands. The majority of the land in the allotment is non-federal lands. Therefore, the EA and the decision document should emphasize the land ownership pattern and recognize how private lands benefit wildlife by providing habitat and forage.
- On page 25 (*Greater Sage-grouse Section*), paragraph #1 describes the Warranted, but Precluded listing by the United States Fish and Wildlife Service (USFWS). The WDA would suggest the EA also

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include the discussion on how grazing was not a primary contributor to the "warranted" determination by the USFWS. According to the Federal Register, 2010, the five threat factors for sage-grouse are: 1) Present or threatened destruction, modification, or curtailment of habitat or range. 2) Overutilization for commercial, recreational, scientific, or educational purposes. 3) Disease or predation. 4) Inadequacy of existing regulatory mechanisms. 5) Other natural or manmade factors affecting its continued existence.

- The Cumulative Impacts Section neglects to discuss the land ownership pattern. This section should go into great detail on how activities occurring on non-federal lands are outside the authority of the BLM to manage.
- The EA should identify both the positive and negative effects each resource has on another resource. The EA does not discuss the positive effects grazing has on certain resources.

We support the KFO working closely with permittees on the future management of the allotment and incorporating their comments and their concerns. The allotment is located within the checkerboard and management changes on the allotment without considering or working intimately with the permittees/landowners would be considered gross negligence.

The WDA supports the continuance of commercial livestock grazing on the Carter Lease Allotment. We appreciate the opportunity to comment on the EA. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



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
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