



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

February 21, 2012

Eastern Region Project Manager  
BLM Wyoming State Office  
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To Whom It May Concern:

Following are the Wyoming Department of Agriculture's (WDA) scoping comments in response to the Notice of Intent to prepare Environmental Impact Statements (EIS) and Supplemental Environmental Impact Statements (SEIS) to incorporate greater sage-grouse conservation measures into land use plans and land management plans by the Bureau of Land Management (BLM) and U.S. Forest Service (FS).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As these actions affect our agriculture industry, our natural resources, and the welfare of our citizens, 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. In August of 2009 the WDA provided written comments for the Wyoming BLM Resource Management Plan amendments and we ask that those comments be considered for the Eastern Region EIS/SEIS.

With management direction of public land, these actions will undeniably affect grazing permittees, agriculture producers, landowners and other citizens, as well as our natural resources, over a large area of Wyoming. Officials need to consider these effects: direct, indirect, cumulative, economic, social, and environmental.

The WDA supports the greater sage-grouse strategy outlined in the Governor's Executive Order 2011-05, particularly Attachment C (Exempt Activities). The list of Exempt (de minimus) Activities includes several livestock grazing management practices that have occurred on public lands for more than 100 years. In addition, the Wyoming Standards for Healthy Rangelands and existing regulations allow Federal agencies the flexibility to make meaningful and educated adjustments to livestock grazing management if conflicts with other resources occur. Livestock grazing management decisions should be made on a case-by-case, allotment-by-allotment basis and not as an overarching land use planning decision. Because of these reasons, the WDA does not believe it is necessary to address livestock grazing management in the upcoming EISs/SEISs.

The EISs/SEISs should allow BLM officials, FS officials, and grazing permittees the opportunity to work cooperatively and provide flexibility in making case-by-case decisions in the best interests of affected natural resources and area citizens. Planning criteria needs to include an objective ensuring management decisions are complimentary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and decisions reflected in the EISs/SEISs will critically impact landowners operations and planned livestock grazing management on these lands. For this reason, BLM and FS officials need to make every effort to ensure their decisions are complimentary to adjoining properties. Decisions affecting livestock grazing and other resource uses in the planning area will have significant direct impacts on grazing permittees.

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Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the study. We urge BLM and FS officials to coordinate with the Department of Agricultural and Applied Economics located in the University of Wyoming, College of Agriculture. They have conducted several studies about the impact of policy upon agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. These EISs/SEISs will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area and these evaluations of economic impacts upon agriculture need to be included.

In addition to its economic significance, livestock grazing provides irreplaceable environmental and social values. These values contribute irreplaceable wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EISs/SEISs.

Livestock grazing is an important tool used to enhance and sustain rangeland health. In Chapter Two of the EISs/SEISs, which includes goals, objectives, and management actions of the various resource values, it is essential these goals, objectives and management actions for livestock grazing management include the *promotion of livestock grazing management*. This is a stark contrast to the belief that livestock grazing management exists only to promote all other resource values. Chapter Two should be written with the understanding that livestock grazing is an important resource value in and of itself. Often, the effects livestock grazing has upon other uses are focused on and the impacts of those uses upon livestock grazing management, forage availability and grazing permittees are overlooked. Planning needs to include the effects greater sage-grouse management has upon livestock grazing management.

Management prescriptions must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM-administered lands. WDA particularly believes BLM should specifically include the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing in the Amendment. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Through experience we have learned many in the public are unaware of this Congressional policy. Yet that policy is critical to livestock grazing in planning area. It is critical that FLPMA is expressed in the EISs/SEISs.

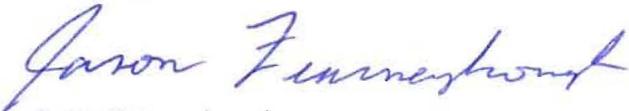
Glossary definitions are extremely important to the actual uses and meanings of those defined terms in the EISs/SEISs. The definition for surface disturbance is particularly significant for livestock grazing. Overly broad definitions create unintended consequences. WDA recommends planners and cooperators utilize and evaluate the "surface-disturbing activity" definition in the Casper BLM EIS/RMP. We also ask that care is taken when developing definitions for "wildlife disturbing activity," "disruptive activity" and similar terms.

The WDA strongly recommends that planning criteria includes information from Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-grouse Habitat (Cagney et al. 2010), and recommendations developed by Local Sage-Grouse Working Groups and the forthcoming Great Sage-Grouse Programmatic CCAA for Wyoming Ranch Management. In addition, peer-reviewed science and solid monitoring data should underlie decisions. The Amendment needs to identify the science supporting the discussions, decisions and actions.

Active collaboration between local cooperators, state cooperators, and BLM and FS officials is key to successful planning. Cooperating agency meetings allow cooperators to discuss and have a shared knowledge of objectives, concerns, existing conditions, and desired conditions. They also help build a confidence in and support for proposed actions. We request meetings of cooperators to help develop goals, objectives, management actions, alternatives, and Draft and Final documents.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed EISs/SEISs. We encourage continued attention to our concerns and look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough  
Director

JF/jc

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