

# 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.*



Dave Freudenthal, Governor  
John Etcheperre, Director

April 18, 2007

BLM Lander Field Office  
Attn: Carol-Anne Murray  
RMP Project Manager  
1335 Main Street  
Lander, Wyoming 82520

Dear Carol-Anne Murray:

Following are the scoping comments of the Wyoming Department of Agriculture for the Revised Lander Resource Management Plan (RMP) for the Bureau of Land Management (BLM).

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

With management direction of 2.5 million acres of BLM-administered surface land and 2.7 million acres of BLM-administered mineral estate set by this revised RMP, this plan will definitely affect grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, over a large area of our state. Officials need to consider these effects: direct, indirect, economic, social, and environmental.

Moreover, decisions that affect grazing or other uses in the study area will have significant compounding impacts and rippling repercussions on private, state, and other federal lands, and upon agriculture producers and communities adjacent to the study area. These impacts and repercussions need to be evaluated. The cumulative adverse impacts upon ranchers specifically should be included.

The revised plan should allow BLM officials, grazing permittees, and company officials the opportunity to work cooperatively, and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens. We believe your planning criteria needs to include an objective that your management decisions are complimentary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and the decisions reflected in the Revised RMP will critically impact ranchers and landowners on these lands. For this reason, we strongly agree that BLM officials need to make every effort to ensure their decisions regarding this revised RMP are complimentary to adjoining

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properties. To ensure the most successful revised planning document, this revised RMP needs to reflect the active coordination of those responsible for making decisions on adjoining private, state, and federal lands. The revised RMP should reflect the synergism resulting from the inclusion of all decision makers on these adjoining lands in the planning of this revised document.

For this synergism to occur, local and state cooperators should be actively involved in the planning and preparation of all stages of this Revised RMP. We are disappointed that BLM Lander officials have not met with either local and state cooperators about the scoping of this plan that states the management direction for the uses of land in the Lander FO planning area for the next two decades. We appreciate the meeting of the Project Manager with state cooperators on November 4, 2005 to introduce her and discuss the future revision of this plan, but there has been no meeting with state cooperators since that time. We appreciate the added complications caused by the interim appointment of the Project Lead as an Acting Field Manager. Nonetheless, we believe that a meeting of state and local cooperators early during the scoping comment period was appropriate and necessary for several reasons. Key BLM staff and resource specialists and local and state cooperators need to get to know each other and begin working with each other if cooperators are to make the wisest recommendations to help prepare the best possible revised RMP. Additionally, shared knowledge of plan objectives, concerns, and existing and desired conditions helps everyone in developing those recommendations. These meetings also help build a confidence in and support for the revised plan. We request meetings of cooperators as often as feasible and possible to help develop goals, objectives, management actions, alternatives, preliminary Draft and Final Environmental Impact Studies (EIS).

Fortunately, revisions of Casper, Kemmerer, Pinedale, and Rawlins RMPs are nearing completion and approaching the official release of Records of Decision. While realizing that conditions are different for every field office, we believe there are important lessons to be learned by looking at the working relationships with cooperators and the respective field office during those revision processes. It appears that those revisions that went the most smoothly and had the most support by local and state cooperators were those that (1) had the most meetings with state and local cooperators and (2) offered opportunities to review two versions each of the preliminary Draft and Final EISs. These additional meetings and versions allowed cooperators and BLM staff additional opportunities to refine the working versions of the EIS and, more importantly, by addressing concerns of BLM specialists and cooperators, to develop strong support by both groups for the revised plan. Thus, we believe it is important that cooperators and BLM specialists be actively involved during the RMP revision process, and we pledge our support to attending meetings and reviewing documents. We ask, however, that sufficient time be allowed for the notification of meetings and review of documents.

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We also encourage BLM officials to work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations regarding this revised land use plan. These folks are intimately familiar with the area under study and possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the rangelands in this area. They are particularly aware of the impacts upon the wildlife and livestock habitat and the rangeland and vegetative health of the proposed project. Their many years of daily on-the-ground wisdom often lead to recommendations that can help identify reasonable and successful management strategies that are both environmentally and economically sound. Thus, we strongly recommend BLM officials aggressively address the concerns and recommendations of these stewards during the planning process. It is imperative that BLM officials ensure that all livestock grazing permittees who are directly affected by this plan receive all notices about this revision.

Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and also in adjoining areas, need to be included in the study. We strongly recommend coordination with the Department of Agricultural Development and Economics of the College of Agriculture of the University of Wyoming. They have conducted several studies about the impact of policy upon agriculture in Wyoming. The studies include the importance of Animal Unit Months, the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The input-output study emphasizes the importance of new out-of-state dollars being brought into the state by agriculture producers' sales and the significant introduction of those new dollars into local economies by the typical producers' expenditures. The infrastructure study shows the revenues generated agriculture significantly exceeds the costs for supporting infrastructure by the county, but that the costs to the county for supporting infrastructure for developments exceed the revenues generated by those developments that replace ranch and farm lands. As the revised Lander RMP will directly affect the continuation of livestock grazing and other agriculture operations on federal and private lands within and adjacent to the Lander RMP planning area, these economic studies and evaluations of economic impacts upon agriculture need to be included in the EIS for the Lander Revised RMP.

We also caution against the over emphasis of the IMPLAN economic model. This model has a tendency to understate the significance of the revised RMP upon local economies by extending the scope of economic impact to a far greater region of economic influence. However, the people most heavily influenced, both beneficially and adversely, are those living and working closest to the Lander RMP planning area. Economic and social impacts of this land use plan revision need to analyze the specific effects upon those most affected.

In addition to its economic impact, livestock grazing represents irreplaceable environmental and social values. This increasingly essential resource value contributes valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image 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 EIS.

The Lander Revised RMP should also adequately reflect the efforts of BLM Lander officials and grazing permittees for several decades to improve rangeland health through the management of livestock grazing. Through allotment management plans, annual operating instruction, range improvements, and other livestock grazing tools, BLM Lander officials and grazing permittees have taken significant strides forward in utilizing livestock grazing to improve rangeland health. The management efforts of BLM officials and grazing permittees in the Lander FO planning area have improved rangeland health. These efforts and improvements should be acknowledged in the EIS chapters on affected environment and environmental consequences.

We strongly believe that the sections of the EIS that discuss livestock grazing need to discuss livestock grazing management, just as the section on wildlife deals with wildlife management. The facts are that livestock don't just appear on federal lands, but are allowed there by grazing permits granted by the BLM Lander FO. Livestock grazing is allowed in accordance with and must meet the provisions of grazing permits, allotment management plans, and annual operating instructions. The facts are that livestock grazing on federal lands within the Lander Revised RMP planning area is managed. The desired effects are intended to be the result of agreed upon management practices of BLM Lander officials and grazing permittees. For these reasons, we believe the Revised RMP needs to address effects, goals, objectives, and management actions of livestock grazing management, not livestock grazing.

In Chapter Two, which includes the goals, objectives, and management actions of the various resource values included in the Revised RMP, we believe it is essential that the goals, objectives, and management actions for livestock grazing management include the promotion of livestock grazing management. The original versions of other revised RMPs often were written so that livestock grazing management existed only to promote all other resource uses. That writing forgot two things. One, that livestock grazing is an important tool in the BLM toolbox to enhance and sustain rangeland health. Two, that livestock grazing is an important resource in and of itself, and deserves to be managed to enhance and sustain this important resource value.

Previous proposed revisions have often unfairly singled out the effects of livestock grazing on other resource values, when other resource users created identical or similar impacts.

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All resource uses which affect other resources under study should be included. For example, we believe it is essential that neither wildlife nor livestock be spotlighted for credit or blame when both are responsible.

Proposed revisions have also focused on the effects of livestock grazing upon other uses in the planning area, while failing to mention the impacts of those other uses upon livestock grazing. The influences of livestock grazing upon fish and wildlife habitat, recreation, vegetation and fire management, mineral development, and other resources and uses were painstakingly detailed. However, the repercussions of these uses upon livestock grazing, grazing habitat, and grazing permittees were, at times, absent. Planning needs to include the effects of each use and resource upon those of the others.

Management prescriptions in the revised RMP must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple use on BLM-administered lands, and these mandates, statutes, and regulations should be an integral part of the plans for the revised RMP. We particularly believe the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing needs to be specifically noted in the revised RMP. 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...." We have learned through experience in working on four previous RMP revisions that many in the public and numerous federal policy officials are unaware of this Congressional policy. Yet that Congressional policy is critical to livestock grazing in the Lander RMP planning area. For these reasons, we believe it is essential that this Congressional policy be specifically expressed in the Revised RMP.

Peer-reviewed science should underlie the revised plan decisions and science should be identified in the decisions and discussions regarding this revised RMP.

The definitions in the Glossary are critically important to the actual uses and meanings of those defined terms in the RMP. The definition for surface disturbing activity is particularly significant for livestock grazing. Two other definitions used in recent revisions of RMPs in Wyoming field offices have been overly broad and, therefore, created unintended consequences. For that reason, we ask that you take special care in crafting the definitions for "Wildlife Disturbing Activity", Disruptive Activity", or similar terms.

Original versions of the revised RMPs for the Casper and Rawlins field offices unfortunately erroneously and unfairly characterized livestock grazing as a significant contributor to air emissions due to the heavy construction activities and tailpipe emissions for transporting livestock. When the estimates for these activities were factually enumerated, the insignificance to air quality of these activities was glaringly obvious. For that reason, the proposed revised Kemmerer RMP correctly omits this unfair and erroneous

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characterization. Given the insignificance of livestock grazing to air quality, we would suggest a similar approach for the Revised Lander RMP.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions, we encourage continued attention to our concerns, and we look forward to hearing about proposed actions and decisions.

Sincerely,

A handwritten signature in cursive script that reads "Jason Fearnley" with a small flourish underneath.

John Etchepare  
Director

JE/dc

cc: Governor's Planning Office