



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

August 9, 2011

Lance Porter, Field Manager  
Rock Springs Field Office  
Bureau of Land Management  
280 Highway 191 North  
Rock Springs, WY 82901

Dear Mr. Porter:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice for the proposed Grazing Plan and permit renewal for the Sage Creek Mountain Allotment (Allotment) within the Rock Springs Field Office (RSFO) 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 the proposed alternatives and subsequent Permit Renewal 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.

Changes to the Allotment Grazing Plan or the implementation of Alternative 2 – Agency Proposed Alternative to reduce Animal Unit Months (AUMs) will 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 RSFO consider the following comments.

The WDA supports Alternative I, which the Sage Creek Mountain Grazing Association developed. This alternative maintains the existing Grazing Plan along with identifying numerous range improvement projects directly developed for the purpose of protecting riparian areas. The identified range improvement projects will assist in accomplishing the goal of achieving Rangeland Health Standard #2. The existing management system, also proposed in Alternative I has moved the Allotment in the right direction since 1998, when the current Grazing Plan was implemented. In 1998 the Allotment did not meet the Standards for Healthy Rangeland #1, #2 and #3, however, since the current Grazing Plan was implemented the Allotment has now achieved Healthy Rangeland Standards #1 and #3. The changes proposed in this alternative will specifically address Standard #2 while continuing to maintain the remaining Healthy Rangeland Standards.

The WDA absolutely does not support Alternative II, the Agency Proposed alternative. A proposed reduction in AUMs of 24% is not justified and is not a valid means to improve the riparian areas. The BLM should focus its management efforts on improving the riparian areas by utilizing Best Management Practices and range improvement projects, not arbitrarily reducing the AUMs. A reduction in AUMs does not address the

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utilization or provide assurances of improvement on the riparian areas. The WDA is concerned the RSFO developed an Agency Proposed alternative to automatically reduce AUMs which was not based on vegetative monitoring data or designed to achieve Healthy Rangeland Standards. An "Agency proposed alternative" may mislead readers to believe this is the BLM's preferred alternative when they have yet to receive or analyze the Scoping Comments have or entertain additional alternatives. We strongly encourage the BLM analyze all alternatives prior to identifying the preferred alternative.

The WDA supports Alternative I; continuing the current Grazing Plan and developing several potential range improvement projects specifically designed to protect riparian areas. It would be a shame to discard all the hard work the BLM and permittees jointly devoted to improve the health of this allotment under the current Grazing Plan. We do not support any AUM reduction or arbitrary changes to an allotment without scientific evidence and analysis of vegetative monitoring data.

The WDA supports the continuance of commercial livestock grazing on the Sage Creek Mountain Allotment. We appreciate the opportunity to comment on the scope of the proposed action. 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  
Wyoming State Grazing Board