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 Etchepare, *Director*

May 9, 2007

Kemmerer Field Office
Mary Jo Rugwell, Field Manager
Bureau of Land Management (BLM)
312 Highway 189 North
Kemmerer, WY 83101-9711

Dear Mary Jo Rugwell:

Following are the comments of the Wyoming Department of Agriculture in response to your recent request for comments in response to the Western Watersheds Project (WWP) Proposal for a Formal Monitoring Agreement on the Smithsfork Allotment.

Our comments are specific to our mission: 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, 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.

We do not believe a Formal Monitoring Agreement should be signed by Bureau of Land Management (BLM) officials, for the following reasons.

The WWP mission states a prime goal is to center their interests and attention on the negative impacts of livestock grazing on public lands. With this as a stated purpose, we believe the scientific validity, credibility, and objectivity of the results of any and all WWP monitoring would be appropriately suspect. These suspicions increase realizing that this WWP data would be used as base line data for any future allotment-wide analysis of the allotment

Moreover, to ensure that any WWP monitoring was above suspicion, BLM officials would have to closely monitor and validate all WWP establishments of monitoring sites and methods, all WWP capturing, analyzing, and reporting of data, and all WWP determinations of conclusions. We don't believe the BLM Kemmerer Field Office has the staff, funding, or other resources available to be able to take these resources away from other higher priority projects and responsibilities, and to rededicate these resources to guarantee reliable and valid WWP monitoring data and conclusions.

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In addition to the aforementioned, there are numerous and far-reaching consequences associated with signing formal monitoring agreements that need to be identified and evaluated before any formal monitoring agreements with WWP are signed.

It is for all of these reasons that we strongly and unequivocally recommend against the signing of any formal monitoring agreement with WWP.

We have no problem with personnel representing WWP being on federal lands conducting monitoring activities as long as (1) they do not interfere with or degrade resource values or activities existing or occurring on those lands, (2) they do not conduct their activities on private lands or state-owned lands unless they have the explicit permission of the appropriate landowners of those lands, and (3) they do not cross private or state-owned lands to conduct their activities on public lands, unless they have the explicit permission of the appropriate landowners of all private and state-owned lands being crossed.

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

Sincerely,

John Etchepare
Director

cc: Governor's Planning Office
Wyoming Game and Fish Department