

February 11, 2009

Steve Calcum
Bureau of Land Management
Kemmerer Field Office
312 Highway 189 North
Kemmerer, Wyoming 83101

Dear Mr. Calcum:

As you are aware I am a partner in the Western Wyoming Range Limited Partnership and have certain BLM grazing privileges associated with that partnership. The partners in the Western Wyoming Range have granted me exclusive use in the northeast area of the Carter Lease allotment. The BLM use is currently permitted for winter sheep use only. I am requesting a change in both the class of livestock and the season of use.

I would like to change the class of livestock to be either sheep or cattle. Only one class of livestock would be permitted in any given year. If I activate the permit for cattle for the year, no sheep would be allowed in that grazing year and vice versa.

When sheep are permitted I will follow the BLM established grazing management plan for the allotment. I would like to change the season of use only in those years when cattle are permitted on the range. When cattle are permitted I would like the season of use to be from May 15th to October 30th. When cattle use the permit I will follow the grazing plan outlined below.

I will divide that area into 6 pastures. Each pasture will have approximately 7,000 acres. The pastures will not be fenced. I will use water and herding to keep the livestock in the correct pasture. On the attached map I have shown the 6 pastures. I will begin with pasture #1 the 1st year and rotate through them about every 28 days. In year two I will follow the same rotation but will begin with pasture #2. Each year I will begin in the next pasture in line so no pasture is used at the same point in the growing season from year to year. In drought years when vegetation is short we will monitor key forage species and move accordingly.

Most of the area has no permanent water. I plan to haul water to each pasture. Approximate water trough locations are also shown on the map. As I move the water the cattle will be forced to move to the next pasture. The water troughs will always be placed on private property rather than BLM property. All troughs will have small games ladders to protect against accidental drowning. There are sufficient roads through out the area to deliver water to all pastures without creating any new roads.

If you have any questions I can be reached at 780-7668.

Sincerely,



D. Jud Redden



Larson Livestock, Inc.



BOX 395 LYMAN, WYOMING 82937

May 22, 2009

John Christensen
Michele Easley
Steve Calkum
Bureau of Land Management
Kemmerer FO
312 Highway 189 North
Kemmerer, WY 83101

via FAX # 307-828-4539

RE: Conversion of Bluemel Permit

Dear John, Michele and Steve:

On 3-23-03, we purchased a summer cattle permit from Rodney and Nola Bluemel. After the purchase, I talked with Ed Feeley about converting the summer cattle use to summer sheep use, using the same conversion ration as we did on the conversion of the Vercimak permit (copy of our "Request for Transfer of Grazing Preference" - Form 4130-1a), which shows this conversion ratio of 8:1. During this conversation Ed said that we needed to send him a letter of request which we did by letter dated 2-25-04 (copy attached). Mary Jo Rugwell asked several questions, to which we responded by letter dated 3-22-04 (copy attached).

A letter dated 2-27-04 (copy attached) was sent to the individuals and organizations listed on the 2nd page for comments which were due back in your office by March 19, 2004.

By letter dated 2-4-05 to Pat Netherly and Ed Feeley, we requested this change in class of livestock regarding the Bluemel permit purchase, could be accomplished at the same time a requested change for our Indian Flats Allotment was being made. Our Indian Flats Permit action was made by Pat Netherly but nothing happened on our Carter Lease Cattle conversion to sheep.

Ed Feeley asked me to be patient and that the BLM would license our Bluemel permit purchase as sheep (we have no cattle) and the conversion ration of 8:1 would apply - the same as with the Vercimak permit that we purchased earlier. As can be seen this in fact happened as we were licensed for 370 sheep AUMs in 2004 and 331 sheep AUMs last year in 2008. (See attached grazing licenses #R452348 for year 2004 and #R621298 for year 2008).

Steve, Ed had his reasons for what he did as I explained to you on the phone. Now you tell me this morning that Michele Easley is not going to honor the working relationship we had with Ed Feeley. As our sheep numbers fluctuate from year to year and we need to have some stability in our operation and as assurance of where we are going to provide the forage for our sheep, we are now at a loss as to what to do. We assumed that there was continuity in the way we were working with Ed, at his request, and we continued to be patient as he requested.

We request you review this information we have provided and hopefully we can continue where Ed left off.


Carl A Larson, President



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4610

Web site: <http://gf.state.wy.us>

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May 28, 2009

WER 9855
Bureau of Land Management
Kemmerer Field Office
Scoping
Grazing Permits for 10-year Permit Renewals
Carter Lease Allotment
Lincoln and Uinta Counties

Steve Calkum, Range Management
Bureau of Land Management
Kemmerer Field Office
312 Highway 189 North
Kemmerer

RECEIVED
BLM FIELD OFFICE
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Dear Mr.

*Mark Zornen
- Green River W&F
307-875-3225 office
~~307~~ mark xt 223*

The staff
10-year G
the follow

We offer

Terrestrial

This allotment
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ease
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1. The Green River Region recognizes the difficulty in managing this allotment given its checkerboard ownership status. When possible, and with neighboring landowner approval, partnerships designed to benefit wildlife and improve habitats should be pursued.
2. Winter sheep use in this allotment is significant. While much of the allotment is in functioning and relatively good condition, localized areas of significant concern occur. An example would be the recent impacts observed in and around the Carter Cedars. Use in this area has significantly altered vegetation health and composition. All vegetation classes, including sagebrush and junipers, have been significantly affected by sheep camp location and intense sheep use in this area. While this area once served (as late as the

mid-1990s) as winter mule deer habitat, few deer now use the area. We recommend sheep camps be constructed outside of this area and herding activities reduce sheep use for a period necessary to promote vegetation recovery. We suggest the BLM – Kemmerer FO facilitate an exchange between BLM staff, permittees and local WGFD personnel to seek solutions to these localized concerns.

Fencing in some areas within the Carter lease inhibit daily and seasonal pronghorn movements. We request the needs of this species be considered in any internal or external allotment or pasture fencing. Where possible, BLM standard three-wire fences that promote pronghorn movement should be employed. Our personnel are available to assist the BLM – KFO in identifying fences of concern. Fences that currently inhibit pronghorn movement, and that exceed minimum livestock and season requirements should be modified to allow pronghorn passage. Barring unrestrictive fencing, we recommend let down panels be employed on BLM lands throughout the allotment.

Aquatic Considerations:

Well-developed riparian zones provide a variety of benefits to fish and wildlife resources including bank stabilization, improved water quality, improved habitat quantity and quality, elevated water tables, increased bank storage capacity, higher late summer stream flows, and higher forage production (Platts 1991). Since riparian habitats comprise only about 3% of the land in the Rocky Mountain West, the importance of this habitat and its proper management cannot be overstated.

Generally, successful management of riparian areas requires management considerations encompassing the entire watershed. Enhancement and management strategies should center on the concept that healthy riparian areas are a product of sound upland as well as riparian vegetation management, which together provide a functional basin-wide ecosystem. This watershed approach will provide habitat for a higher diversity of fish and wildlife, while enhancing production and nutritional quality of forage for wildlife and domestic livestock.

1. **General Utilization Guideline** Limit livestock grazing to utilization levels suitable for the time of year and current ecological site condition (Dietz 1988).
2. **Riparian Areas in Good Condition** For areas in good to high ecological status, residual stubble or regrowth should be at least 4-6 inches to provide sufficient herbaceous vigor, maintenance, bank protection, and sediment entrapment (Clary and Webster 1989). Hall and Bryant (1995) suggested that one of the signs of impending cattle grazing damage to riparian areas was when stubble height of the most palatable species reaches 3 inches.
3. **Utilization of Overgrazed or Degraded Riparian Areas** Riparian management literature (Clary and Webster 1989, Ohmart 1996, Schulz and Leninger 1990) recommends utilization rates of 20%-30% of current annual growth, or even complete rest for one or more years, to restore the vigor and health of degraded riparian areas. Livestock use in an overgrazed area should be limited to 30 days or less during each

Mr. Steven Calkum
KFO
5/28/09

growing season. After utilization limits are reached in all or a portion of a pasture, livestock should be removed from the pasture until after the next growing season.

Higher utilization rates are only suggested for areas in healthy condition, and then only in the early growing season or in areas receiving periodic rest. One year of rest and/or the following maximum utilization levels should be applied to riparian areas in less than satisfactory condition:

<u>Sedges</u>	<u>Willows**</u>			
Early Season (6/1 to 7/1)	50%	or 3" stubble height*	40%	
Mid Season (7/1 to 8/1)	40%	or 4" stubble height	30%	
Late Season (8/1 to 10/1)	30%	or 6" stubble height	20%	

*Stubble height should be measured at least one foot back from water's edge.

**Monitor the frequency of plants (terminal buds) browsed. These criteria may be applied to other important, woody riparian species (e.g. aspen, cottonwood, birch, etc.).

Note: Seasons suggested (early, mid, and late) apply to mid elevation (5500' to 8500') sagebrush-grassland, mountain shrub, and aspen vegetation zones.

4. Rest Rotation Pasture System The primary justification for implementing a rest rotation pasture system would be to accelerate and simplify vegetation treatments. The time frame necessary to treat an allotment or watershed can be reduced significantly if treatments are planned in conjunction with rest periods in each pasture. Completing vegetation treatments prior to the designated rest year reduces the need for alternate means of livestock control (e.g., electric fences, herding). An accelerated rate of implementation will result in better distribution of herbivores over treated areas, and will reduce potential impacts that wildlife or livestock may have on smaller, more widely spaced treatment areas

5. Grazing Management Tools Use salting, herding, and upland water/shade development to reduce grazing pressure in riparian areas.

6. Improving Range Conditions We strongly encourage and support the improvement of range conditions as well as riparian conditions, since this improvement will reduce sedimentation and avoid or minimize related fishery impacts.

7. Watershed Stability We strongly support management decisions that will lead to improved watershed stability, enhanced vegetation conditions and riparian vegetation development. To meet these goals, we recommend the following strategies:

1. the use of riparian or other special use pastures (e.g, limited or closely controlled),
2. development of alternate water sources away from riparian areas,
3. location of stock driveways outside of riparian areas,
4. regular, systematic herding of livestock away from riparian areas ,
5. salting outside of riparian areas,
6. reduction of grazing intensity and
7. changing season(s) of use.

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8. **Grazing on Steep Slopes** Grazing should be reduced in watersheds with steep slopes to improve soil stability in these areas.
9. **Limiting Grazing on Spring Pastures** On most pastures in good to high ecological status grazed in spring only, utilization of streamside herbaceous forage should be limited to about 65% of the current growth and livestock should normally be removed by July 15 to allow sufficient time for plant re-growth. On lower elevation pastures, the appropriate spring removal date may be substantially earlier (Clary and Webster 1989).
10. **Limiting Grazing on Summer Pastures** On pastures in good to high ecological status managed for summer grazing only, streamside utilization of herbaceous forage should not exceed 50% of the current growth (Clary and Webster 1989).
11. **Limiting Grazing on Fall Pastures** On pastures in good to high ecological status managed for fall grazing only, use of streamside vegetation should not exceed 30% and at least 6 inches of herbaceous stubble should be left at the end of the grazing period (Clary and Webster 1989).
12. **Limiting Season-Long Grazing** Season-long grazing in good to high ecological status should be limited to those situations where animal use and distribution can be carefully controlled to protect riparian areas and vegetation. For methods of limiting impacts to these areas, see the recommendations for Watershed Stability.
13. **Grazing Intensity and Stocking Rate compared to Grazing Management Systems or Apply appropriate stocking rates:** Holechek, et al. (1999, and 1999) reported that light to moderate stocking rates and subsequently proper utilization levels consistently produced both higher ecological conditions and higher livestock performance and financial returns than heavy stocking rates and high utilization levels, regardless of the grazing system used. Therefore, grazing systems should be adapted to each specific operation with an emphasis on setting stocking rates and implementing management practices that prevent heavy utilization rates. Holechek (1988) provides an excellent guide for establishing the appropriate stocking rate for an allotment or pasture.

Mr. Steven Calkum
May 28, 2009
Page 4 - WER 9855

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Mark Zornes or Robert Keith of our Green River Regional office at 307-875-3225.

Sincerely,

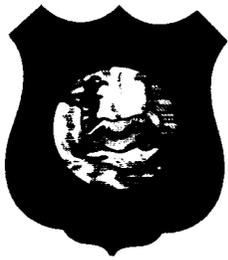


for John Emmerich
Deputy Director

JE: MF:gfb

cc: USFWS
Robert Keith
M. Zornes-WGFD, Green River

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WYOMING GAME AND FISH DEPARTMENT

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DIRECTOR
STEVE K. FERRELL

COMMISSIONERS
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MIKE HEALY
FRED LINDZEY

October 28, 2009

WER 9855
Bureau of Land Management
Kemmerer Field Office
Re-analyze
Grazing Permits for 10-year Permit Renewals
Carter Lease Allotment
Lincoln and Uinta Counties

Steve Calkum, Range Management
Bureau of Land Management
Kemmerer Field Office
312 Highway 189 North
Kemmerer, WY 83101

Dear Mr. Calkum:

The staff of the Wyoming Game and Fish Department has reviewed the 10-year Grazing Permits for Carter Lease Allotment in Lincoln and Uinta Counties. We offer the following comments for your consideration.

Please review our comments provided in our letter of May 28, 2009. Many of the issues such as fencing design, pronghorn winter range, and fisheries concerns still apply.

Most of the upland areas in the allotment receive 7-9 inches of precipitation annually. This results in a sagebrush grassland and salt desert shrub types that lack adequate and reliable water sources to successfully sustain a cattle grazing operation without further degrading existing riparian areas and corridors. The rangelands in this area are much more suited to winter sheep grazing.

The conversion from winter sheep to summer cattle could likely negatively impact riparian vegetation along the Black's Fork, and Muddy Creeks due to the lack of adequate riparian pasture fencing, lack of adequate alternative upland water sources, and the inability to effectively herd cattle away from the perennial water along the river and streams.

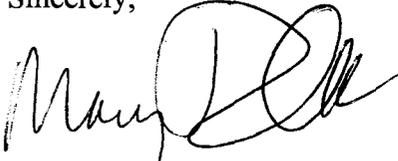
We ask that PFC be considered adequate before any conversion is granted. An adequate monitoring plan should also be in place to continue to monitor for PFC. Allotment management plans should be developed to sustain riparian areas at proper functioning condition over time,

and should encourage achievement of PFC's Desired Plant Community (DPC) for all riparian areas in the allotment. Riparian Greenline vegetation monitoring should also be established to collect trend information for evaluating the effectiveness of cattle grazing management in the allotment.

The proposal suggests a straight conversion of 2288 sheep AUMs to 2288 cattle AUMs. We have concerns with this straight conversion as a cattle AUM is not equivalent to a sheep AUM. Many of the areas used for winter sheep grazing are likely not suitable for cattle grazing because of the lack of reliable water sources, making a straight conversion impossible. We suggest that the BLM either conduct a cattle grazing suitability evaluation of the entire allotment based on distance to reliable water sources or utilize a GIS grazing models (if there is reliable data) to determine which areas of the allotment are suitable for cattle grazing and the appropriate stocking rates.

Thank you for the opportunity to comment. If you have any questions or concerns, please Robb Keith, Regional Fish Supervisor, or Mark Zornes, Wildlife Habitat Coordinator at 307-875-3225.

Sincerely,

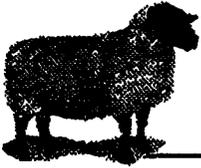


for
John Emmerich
Deputy Director

JE: MF:gfb

cc: USFWS
R. Keith, M. Zornes- WGFD, Green River

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Larson Livestock, Inc.



BOX 395 LYMAN, WYOMING 82937
May 27, 2009

Steve Calkum
Range Management Specialist
Bureau of Land Management
Kemmerer Field Office
Kemmerer, WY 83101

via FAX # 307-828-4539

RE: Scoping letter dated 4-28-09 (Carter Lease Allotment Permit Renewals)

Dear Steve:

We purchased a cattle grazing permit from Rodney and Nola Bluemel in 2003. We have sold all of our cattle, and request you convert our summer cattle permit to summer sheep, at the conversion rate of 8:1 as has been done in the past. The reason for this conversion ratio is due to the differences in the forage preferences of sheep as compared to cattle and recognized with the different "Proper Use Factors" used in the 1971 range adjudication for the Carter Lease Allotment.

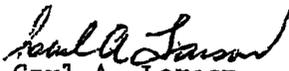
The adjudicated cattle AUMs for Lelan Bluemel, predecessor to Rodney and Nola Bluemel, dated by certified letter from the BLM dated July 16, 1971 was 237 AUMs of active Federal Range permitted grazing use with 37 AUMs of Federal Range Suspended Nonuse (representing the potential of the range with management). Also included in this Carter Lease adjudication of the grazing privileges was the season of use for this permit, which was from May 1 to October 31 of each year.

We request our above described cattle permit, using the conversion ration of 8:1 be shown as follows:

Class of Livestock	Federal AUMs		Season of Use		% Federal AUMs
	Active	Suspended	Start	End	
Sheep	379	59	5/1	10/31	100

If you have any questions, please let us know. Thank you.

Sincerely


Carl A. Larson
President



WYOMING GAME AND FISH DEPARTMENT

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October 28, 2009

WER 9855
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Re-analyze
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Lincoln and Uinta Counties

Steve Calkum, Range Management
Bureau of Land Management
Kemmerer Field Office
312 Highway 189 North
Kemmerer, WY 83101

Dear Mr. Calkum:

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Please review our comments provided in our letter of May 28, 2009. Many of the issues such as fencing design, pronghorn winter range, and fisheries concerns still apply.

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We ask that PFC be considered adequate before any conversion is granted. An adequate monitoring plan should also be in place to continue to monitor for PFC. Allotment management plans should be developed to sustain riparian areas at proper functioning condition over time,

and should encourage achievement of PFC's Desired Plant Community (DPC) for all riparian areas in the allotment. Riparian Greenline vegetation monitoring should also be established to collect trend information for evaluating the effectiveness of cattle grazing management in the allotment.

The proposal suggests a straight conversion of 2288 sheep AUMs to 2288 cattle AUMs. We have concerns with this straight conversion as a cattle AUM is not equivalent to a sheep AUM. Many of the areas used for winter sheep grazing are likely not suitable for cattle grazing because of the lack of reliable water sources, making a straight conversion impossible. We suggest that the BLM either conduct a cattle grazing suitability evaluation of the entire allotment based on distance to reliable water sources or utilize a GIS grazing models (if there is reliable data) to determine which areas of the allotment are suitable for cattle grazing and the appropriate stocking rates.

Thank you for the opportunity to comment. If you have any questions or concerns, please Robb Keith, Regional Fish Supervisor, or Mark Zornes, Wildlife Habitat Coordinator at 307-875-3225.

Sincerely,

for

John Emmerich
Deputy Director

JE: MF:gfb

cc: USFWS
R. Keith, M. Zornes- WGFD, Green River

Wyoming Department of Agriculture

2219 Carey Avenue, Cheyenne, WY 82002 n Phone: 307-777-7321 n Fax: 307-777-6593 n Website: wyagric.state.wy.us n Email: wda1@state.wy.us

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
Jason Fearneyhough Director

May 26, 2009

John R. 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 re-analyzing of Carter Lease Grazing Allotment for their 10-year permit renewal located within the Kemmerer Field Office (FO) 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 proposed project 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 proposed action intends to analyze the Carter Lease Grazing Allotment and 10-year grazing permit with no new restriction, along with analyzing the closing of the allotment to livestock grazing. Changes to the allotment will significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the project area.

The WDA does not support analyzing the closing of federal lands within the allotment to livestock grazing. The current Resource Management Plan (RMP) dated June, 1986, along with the revised RMP (August, 2008 – Record of Decision (ROD) pending), have already dismissed this alternative from further study. The reason for not analyzing the "No Livestock Grazing Alternative" was provided in the current RMP - Rangeland Program Summary of the ROD:

" An alternative of "No Livestock Grazing on Public Lands" was considered during the planning process. It was eliminated from detailed study because it was felt to be unreasonable. To prohibit all livestock grazing, the public lands would have to be fenced. This would not be practical or feasible, particularly where public lands are heavily interspersed with private lands. It would also not be feasible to require ranchers to control their livestock to keep them off unfenced public land. The costs would be too great for the ranchers and the Bureau. All lands would have to be marked and an intensive monitoring and enforcement program would have to be implemented."¹

¹ Record of Decision for the Kemmerer Resource Management Plan and Rangeland Program Summary Document. June, 1986. Bureau of Land Management. Page 2.

BOARD MEMBERS

Juan Reyes, District 1 ● Jim Hodder, District 2 ● Shaun Sims, District 3 ● Jim Bennage, District 4 ● Joe Thomas, District 5
● Bryan Brost, District 6 ● Jim Price, Jr., District 7

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Patrick Zimmerer, Southeast ● Dalin Winters, Northwest ● John Hansen, Southwest ● Bridget Kukowski, Northeast

In addition, the revised RMP under Section 2.3 Alternatives Considered, but Not Carried Forward for Detailed Analysis states in consideration of prohibiting or excluding livestock grazing in the planning areas:

“FLPMA requires the BLM to manage public lands and resources according to the principles of multiple use and sustained yield. Alternatives inconsistent with BLM’s multiple use mandate were not carried forward.”²

It is clear under the current RMP and the revised RMP that Livestock grazing is an approved activity and the “No Grazing Alternative” should not be re-analyzed under this planning effort. Management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. WDA particularly believes 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 environmental document. 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...” Many in the public are unaware of this Congressional policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource, and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. If the Kemmerer FO insists on analyzing the “No Grazing Alternative”, then we insist the Kemmerer FO provides an in-depth analysis of the adverse socio-economic impacts this alternative would create to the permittees, local community and the State. We urge Kemmerer FO officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of Agriculture, who conducted several studies showing how federal policies impact 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. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Sheep and cattle have grazed the landscape for over 100 years. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland 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

² Proposed Resource management Plan and Final Environmental Impact Statement for the Kemmerer Field Office Planning Area. August, 2008. Bureau of Land Management.

essential environmental, historic, and social values of livestock grazing should be included by the Kemmerer FO in the scope of the analysis.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The environmental document and analysis needs to include (1) the positive effects livestock grazing has upon the environment (Severson, 1990³; Urness, 1990⁴), and (2) how livestock grazing assists in achieving environmental objectives (Severson, 1990; Urness, 1990) and objectives set forth in the Kemmerer Resource Management Plan (RMP).

The WDA appreciates the efforts of the Kemmerer FO staff in working with interested permittees and strongly urge this practice continues with all permittees located within the allotment. We encourage Kemmerer FO officials to work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. Producers are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound. Thus, we strongly recommend Kemmerer FO officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring grazing permittees who are directly affected by this plan receive all notices about this renewal.

In closing, we must remember that livestock grazing is an approved activity, the Kemmerer FO decisions made in the proposed action should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions and be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims.

The WDA does not support the idea of evaluating the allotment as an “all or nothing” endeavor. The National Environmental Policy Act of 1969 (NEPA) requires that all reasonable alternatives be evaluated, however, we do not believe the no grazing alternative is a reasonable alternative since the current and revised Kemmerer RMP states that reductions, limitations or actions that

³ Severson, K.E. 1990. Summary: Livestock grazing as a wildlife management tool. p. 3-6 *In*: K.E. Severson. Can Livestock Be Used As a Tool to Enhance Wildlife Habitat. Gen. Tech Rep. RM-194. U.S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.

⁴ Urness, P.J. 1990 Livestock as manipulators of mule deer winter habitats in northern Utah. p. 25-35. 6 *In*: K.E. Severson, tech. coord. Can Livestock Be Used As a Tool to Enhance Wildlife Habitat. Gen. Tech Rep. RM-194. U.S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.

Kemmerer Field Office
Bureau of Land Management
Carter Lease Grazing Allotment & Permit Renewal
05/26/2009
Page 4

prohibit livestock grazing is considered an adverse impact. It is important the Kemmerer FO analyze potential identified issues in the analysis on a case-by-case basis while considering all the potential causal factors associated with a potential issue, rather than isolating or focusing on just livestock grazing.

We support the continuance of commercial livestock grazing on the Carter Lease Grazing 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 Planning 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
State Grazing Board



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4610

Web site: <http://gf.state.wy.us>

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AARON CLARK
JERRY GALLES
MIKE HEALY
FRED LINDZEY

FAX TRANSMITTAL

TO: Steve Calkum

FAX NUMBER: 307-828-4539

FROM: WILDLIFE HABITAT PROTECTION PROGRAM

TELEPHONE: 307-777-4506 FAX 307-777-4677

DATE: 5-28-09

PAGES: 6 (INCLUDING COVER SHEET)

NOTES: WER 9855

Please call (307) 777-4506 immediately if Complications develop

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May 28, 2009

WER 9855
Bureau of Land Management
Kemmerer Field Office
Scoping
Grazing Permits for 10-year Permit Renewals
Carter Lease Allotment
Lincoln and Uinta Counties

Steve Calkum, Range Management
Bureau of Land Management
Kemmerer Field Office
312 Highway 189 North
Kemmerer, WY 83101

Dear Mr. Calkum:

The staff of the Wyoming Game and Fish Department has reviewed the scoping for 10-year Grazing Permits for Carter Lease Allotment in Lincoln and Uinta Counties. We offer the following comments for your consideration.

Terrestrial Considerations:

This allotment contains a considerable amount of important habitats for the Carter Lease pronghorn herd, is (in-part) core habitat for greater sage-grouse, and has some (although limited) habitat of value for the Uinta and Wyoming Range mule deer herds. The Green River Region has the following concerns and comments:

1. The Green River Region recognizes the difficulty in managing this allotment given its checkerboard ownership status. When possible, and with neighboring landowner approval, partnerships designed to benefit wildlife and improve habitats should be pursued.
2. Winter sheep use in this allotment is significant. While much of the allotment is in functioning and relatively good condition, localized areas of significant concern occur. An example would be the recent impacts observed in and around the Carter Cedars. Use in this area has significantly altered vegetation health and composition. All vegetation classes, including sagebrush and junipers, have been significantly affected by sheep camp location and intense sheep use in this area. While this area once served (as late as the

mid-1990s) as winter mule deer habitat, few deer now use the area. We recommend sheep camps be constructed outside of this area and herding activities reduce sheep use for a period necessary to promote vegetation recovery. We suggest the BLM – Kemmerer FO facilitate an exchange between BLM staff, permittees and local WGFD personnel to seek solutions to these localized concerns.

Fencing in some areas within the Carter lease inhibit daily and seasonal pronghorn movements. We request the needs of this species be considered in any internal or external allotment or pasture fencing. Where possible, BLM standard three-wire fences that promote pronghorn movement should be employed. Our personnel are available to assist the BLM – KFO in identifying fences of concern. Fences that currently inhibit pronghorn movement, and that exceed minimum livestock and season requirements should be modified to allow pronghorn passage. Barring unrestrictive fencing, we recommend let down panels be employed on BLM lands throughout the allotment.

Aquatic Considerations:

Well-developed riparian zones provide a variety of benefits to fish and wildlife resources including bank stabilization, improved water quality, improved habitat quantity and quality, elevated water tables, increased bank storage capacity, higher late summer stream flows, and higher forage production (Platts 1991). Since riparian habitats comprise only about 3% of the land in the Rocky Mountain West, the importance of this habitat and its proper management cannot be overstated.

Generally, successful management of riparian areas requires management considerations encompassing the entire watershed. Enhancement and management strategies should center on the concept that healthy riparian areas are a product of sound upland as well as riparian vegetation management, which together provide a functional basin-wide ecosystem. This watershed approach will provide habitat for a higher diversity of fish and wildlife, while enhancing production and nutritional quality of forage for wildlife and domestic livestock.

- 1. General Utilization Guideline** Limit livestock grazing to utilization levels suitable for the time of year and current ecological site condition (Dietz 1988).
- 2. Riparian Areas in Good Condition** For areas in good to high ecological status, residual stubble or regrowth should be at least 4-6 inches to provide sufficient herbaceous vigor, maintenance, bank protection, and sediment entrapment (Clary and Webster 1989). Hall and Bryant (1995) suggested that one of the signs of impending cattle grazing damage to riparian areas was when stubble height of the most palatable species reaches 3 inches.
- 3. Utilization of Overgrazed or Degraded Riparian Areas** Riparian management literature (Clary and Webster 1989, Ohmart 1996, Schulz and Leninger 1990) recommends utilization rates of 20%-30% of current annual growth, or even complete rest for one or more years, to restore the vigor and health of degraded riparian areas. Livestock use in an overgrazed area should be limited to 30 days or less during each

growing season. After utilization limits are reached in all or a portion of a pasture, livestock should be removed from the pasture until after the next growing season.

Higher utilization rates are only suggested for areas in healthy condition, and then only in the early growing season or in areas receiving periodic rest. One year of rest and/or the following maximum utilization levels should be applied to riparian areas in less than satisfactory condition:

<u>Sedges</u>	<u>Willows**</u>		
Early Season (6/1 to 7/1)	50%	or 3" stubble height*	40%
Mid Season (7/1 to 8/1)	40%	or 4" stubble height	30%
Late Season (8/1 to 10/1)	30%	or 6" stubble height	20%

*Stubble height should be measured at least one foot back from water's edge.

**Monitor the frequency of plants (terminal buds) browsed. These criteria may be applied to other important, woody riparian species (e.g. aspen, cottonwood, birch, etc.).

Note: Seasons suggested (early, mid, and late) apply to mid elevation (5500' to 8500') sagebrush-grassland, mountain shrub, and aspen vegetation zones.

4. Rest Rotation Pasture System The primary justification for implementing a rest rotation pasture system would be to accelerate and simplify vegetation treatments. The time frame necessary to treat an allotment or watershed can be reduced significantly if treatments are planned in conjunction with rest periods in each pasture. Completing vegetation treatments prior to the designated rest year reduces the need for alternate means of livestock control (e.g., electric fences, herding). An accelerated rate of implementation will result in better distribution of herbivores over treated areas, and will reduce potential impacts that wildlife or livestock may have on smaller, more widely spaced treatment areas

5. Grazing Management Tools Use salting, herding, and upland water/shade development to reduce grazing pressure in riparian areas.

6. Improving Range Conditions We strongly encourage and support the improvement of range conditions as well as riparian conditions, since this improvement will reduce sedimentation and avoid or minimize related fishery impacts.

7. Watershed Stability We strongly support management decisions that will lead to improved watershed stability, enhanced vegetation conditions and riparian vegetation development. To meet these goals, we recommend the following strategies:

1. the use of riparian or other special use pastures (e.g. limited or closely controlled),
2. development of alternate water sources away from riparian areas,
3. location of stock driveways outside of riparian areas,
4. regular, systematic herding of livestock away from riparian areas ,
5. salting outside of riparian areas,
6. reduction of grazing intensity and
7. changing season(s) of use.

8. **Grazing on Steep Slopes** Grazing should be reduced in watersheds with steep slopes to improve soil stability in these areas.
9. **Limiting Grazing on Spring Pastures** On most pastures in good to high ecological status grazed in spring only, utilization of streamside herbaceous forage should be limited to about 65% of the current growth and livestock should normally be removed by July 15 to allow sufficient time for plant re-growth. On lower elevation pastures, the appropriate spring removal date may be substantially earlier (Clary and Webster 1989).
10. **Limiting Grazing on Summer Pastures** On pastures in good to high ecological status managed for summer grazing only, streamside utilization of herbaceous forage should not exceed 50% of the current growth (Clary and Webster 1989).
11. **Limiting Grazing on Fall Pastures** On pastures in good to high ecological status managed for fall grazing only, use of streamside vegetation should not exceed 30% and at least 6 inches of herbaceous stubble should be left at the end of the grazing period (Clary and Webster 1989).
12. **Limiting Season-Long Grazing** Season-long grazing in good to high ecological status should be limited to those situations where animal use and distribution can be carefully controlled to protect riparian areas and vegetation. For methods of limiting impacts to these areas, see the recommendations for Watershed Stability.
13. **Grazing Intensity and Stocking Rate compared to Grazing Management Systems or Apply appropriate stocking rates:** Holechek, et al. (1999, and 1999) reported that light to moderate stocking rates and subsequently proper utilization levels consistently produced both higher ecological conditions and higher livestock performance and financial returns than heavy stocking rates and high utilization levels, regardless of the grazing system used. Therefore, grazing systems should be adapted to each specific operation with an emphasis on setting stocking rates and implementing management practices that prevent heavy utilization rates. Holechek (1988) provides an excellent guide for establishing the appropriate stocking rate for an allotment or pasture.

Mr. Steven Calkum
May 28, 2009
Page 5 - WER 9855

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Mark Zornes or Robert Keith of our Green River Regional office at 307-875-3225.

Sincerely,

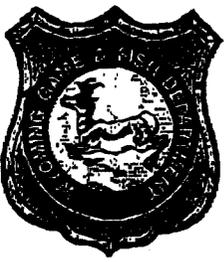


Per John Emmerich
Deputy Director

JE: MF:gfb

cc: USFWS
Robert Keith
M. Zornes-WGFD, Green River

Carter Lease Allotment # 11306 RIPS projects as of 5/13/2009									
Pjt Nbr	Improvement Name	Improvement Class	Improvement Type	Meridian	Township	Range	Sec	Subdiv	Allot #
001182	Section 4 corner crossing	Water Control/Development	Pipelines	6th Principi	18.25N	116W	4	SESE	11306
945122	ROBERSON SPRING	Water Control/Development	Springs	6th Principi	20N	114W	34	NW	11306
945123	ISOLATED HOLE SPRING	Water Control/Development	Springs	6th Principi	20N	116W	10	NENW	11306
945124	LITTLE ROUND MNT SP.	Water Control/Development	Springs	6th Principi	20N	116W	26	SESW	11306
945125	CARTER LEASE 32NW	Water Control/Development	Reservoirs	6th Principi	20N	115W	32	NW	11306
945126	CARTER LEASE 18NW	Water Control/Development	Reservoirs	6th Principi	19N	113W	18	NW	11306
945127	CARTER LEASE 28SW	Water Control/Development	Reservoirs	6th Principi	20N	114W	28	SW	11306
945128	CARTER LEASE 36NE	Water Control/Development	Reservoirs	6th Principi	19N	114W	36	NE	11306
945131	CARTER LEASE 26SW	Water Control/Development	Reservoirs	6th Principi	19N	115W	26	SW	11306
945132	CARTER LEASE 28NE	Water Control/Development	Reservoirs	6th Principi	18N	116W	28	NE	11306
945133	CARTER LEASE 28SW-18	Water Control/Development	Reservoirs	6th Principi	18N	116W	28	SW	11306
945134	CARTER LEASE 16NW	Water Control/Development	Reservoirs	6th Principi	17N	115W	16	NW	11306
945135	CARTER LEASE 24NE	Water Control/Development	Reservoirs	6th Principi	17N	116W	24	NE	11306
945136	CARTER LEASE 26SE	Water Control/Development	Reservoirs	6th Principi	18N	115W	26	E	11306
945137	CARTER LEASE 28NW	Water Control/Development	Reservoirs	6th Principi	18N	115W	28	NW	11306
945138	CARTER LEASE 28SE	Water Control/Development	Reservoirs	6th Principi	18N	116W	28	SE	11306
945139	CARTER LEASE 14SE	Water Control/Development	Reservoirs	6th Principi	18N	115W	14	SE	11306
945141	CARTER LEASE 10NW	Water Control/Development	Reservoirs	6th Principi	17N	115W	10	NW	11306
945142	MULKAY SPRING	Water Control/Development	Springs	6th Principi	18N	115W	18	SW	11306
945268	ZIEGLERS WASH MOWING	Vegetation Manipulation		6th Principi	19N	113W	2	S1/2	11306
945281	COW HOLLOW HERBICIDE	Vegetation Manipulation		6th Principi	21N	113W	14	S1/2	11306
945363	LINCOLN CO WEED AGR	Weed Control		6th Principi	19N	112W	1	ALL	11306
945407	UINTA CO WEED AGRMNT	Weed Control		6th Principi	18N	112W	1	ALL	11306
945426	HAMPTON MOWING	Vegetation Manipulation		6th Principi	18N	114W	18		11306
945427	HAMPTON HERBICIDE	Vegetation Manipulation		6th Principi	18N	114W	8		11306
945428	ZIEGLERS FLAT MOWING	Vegetation Manipulation		6th Principi	20N	113W	18		11306



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Please call (307) 777-4506 immediately if Complications develop

"Jonathan B. Ratner " <jonathan@westernwatersheds.org>

10/25/2009 04:28 PM

To

<Steven_Calkum@blm.gov>

cc

bcc

Subject

Part 22 of 22

Steve,

Be sure to carefully follow the BLM's 2004 sage grouse conservation strategy and evaluation regional SG populations and trend. Also the BLM needs to take a hard look at the cumulative impacts of oil and gas, grazing and fragmentation.

Please be sure to review the RMP for requirements for this area as well as for livestock conversions.

Please also note that the BLM must analyze actual use over the last 15-30 years and compare that to permitted use as if the BLM just assumes that current conditions are the result of permitted use when actual use may be only 60% of permitted. Using only permitted use will vitiate all the impact analyses.

Actual use and permitted use must be looked at by operator and combined for type of livestock by year.

Also we are concerned by a straight 1:1 conversion from sheep to cattle. This was done back in the 50's but we know better than to do that now.

Get parts 13 -21 from John Christensen.

Jonathan B. Ratner
Director - WWP Wyoming Office
PO Box 1160
Pinedale, WY 82941
Tel: 877-746-3628
Fax: 707-597-4058