Jack Corbett
1090 Graham Road
Lander, Wyoming 82520
(307) 544-2357

Bureau Land Management
Lander Field Office
Box 589
Lander, Wyoming 82520

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RE: RMP/EIS

To Whom It May Concern:

Having received a computer disc concerning the draft RMP/EIS my computer would not print it, so I have had to request a hard copy, which I have received and I am grateful for that. However, due to the size of the document and the lengthy narratives there in I fail to see how myself or anyone else could make a comprehensive comment on the entire document or even parts of it.

On the subject of healthy rangelands (pg. XLIX), it is the opinion of most rangeland experts that reduction of domestic livestock AUMs does not in itself contribute to the health of rangeland. We as livestock permitees on federal land believe that the whole management plan has more to do with healthy rangelands than reduction of numbers.

This writer cannot find in this document any mention of "Allotment Management Plan", instead we are now being introduced to an "Activity Plan" or most recently a "Comprehensive Grazing Management Strategy " (CGMS). These approaches may be helpful but have not been developed in a thoughtful fashion and appear to this writer to be a "smoke and mirrors" avenue to cause more red tape, concerns, delays and roadblocks to developing healthy rangelands.

The reduction of AUMS available to livestock operators is an approach that we as operators whole-heartedly disagree with on the grounds there are other causes for rangeland down-turn in the way of "wild" horses for instance, recreational use, oil and gas pipelines, weather and other causes that can and do contribute (pg. 24) to standards not being met.

(Pg. 37) This writer does not support the concept of ACECs and opposes the inclusion of these in the RMP documents, as they are a left-field approach to de-facto management as if these ACECs were "Wilderness Areas".

(Pg. 100) (Alternative D) This supposes that developing a water source in "Critical Winter Habitat" for wildlife would be detrimental. Since most wildlife drink water and do so a good share of the time at the livestock operators expense how could

this be detrimental? I offer this – suppose that since a huge share of "Critical Winter Habitat" is on the river bottoms where most ranches are located that this may be "Critical Livestock Winter Habitat".

(Pg. 111) The Wild Horse and Burro Act of 1971 states that no horses or burros will be allowed outside of existing Herd Management Areas. No expansion of these HMAs should be allowed or even suggested in this RMP.

(Pg. 223) (Alternative D) Any land use plan should contain "impacts on Quality of Life and Local Customs and Cultures" but I contend that reduction of grazing AUMs will have more than a "moderate" adverse affect on the local culture and the health of the agriculture community. It seems that throughout this draft there is an underlying tone of negativity concerning public land grazing and the ranching community. My contention in that the ranching community does contribute to a very high degree to the well being of the western economy.

(Pg. 905) With regard to developing a "Comprehensive Grazing Strategy" before any range improvements can or may not proceed amounts to another roadblock in the management of a healthy rangeland. It seems to me that an AMP is completely adequate to accomplish the objective without the potential of more bureaucratic red tape and should be contained in the final RMP.

(Pg. 995) Stubble height and/or utilization on riparian areas especially do not paint a true picture of the health of an allotment. Using 1% or 2% of the land area for measurement is not an accurate yardstick.

In the final RMP there should be included a table which illustrates the Preference level, any inactive AUMs and AUMs in temporary suspended use, if any, and the AUMs generated by private and state lands unfenced that lie in the allotment. I think this would paint a more accurate picture of the status of the allotment.

(Pg. 1015) I know of no regulation or part of the Taylor Grazing Act that gives BLM authority to develop "forage reserves". This paragraph should not be in a final RMP.

(Pg. 1320) Livestock roundups and other historic and necessary activities should not be considered "disruptive activities". These activities are a necessary tool in the management of a healthy allotment. This paragraph should be stricken.

(Pg. 1338) We contend that all range improvement activities are not necessarily "surface disturbing activities". Building a road or a petroleum pipelines through an allotment is a "surface disturbing activity".

(Pg. 1446) With respect to the culture and well-being of the people in this study area, I contend that the Land Use Plan developed by Fremont County should be adhered to and complied with in the final RMP.

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I believe the following paragraph should indeed be included in these statements. From my perspective of this document I believe that in the grazing section, this narrative has been written by people who have no real knowledge of how a ranch must be operated so as to be a viable business, be able to be profitable and to be able to sustain itself. I think that more coordination with the ranching community should have been done and should be done.

Thank you for the opportunity to comment on this draft RMP, It is my hope and prayer that this document, when final, will reflect a workable and just plan for the people who reside in this planning area.

Respectfully submitted
Jack Corbett

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