

Crofts Sheep Company
C/o Joseph & Deanna Crofts
PO Box 226
Riverton, WY 82501

January 19, 2012

Department of Land Management, BLM
Lander Field Office
PO Box 589
Lander, WY 82520

RE: Resource Management Plan and Environmental Impact Statement for the Lander
Field Office Planning Area

On behalf of the family of Joseph P. Crofts, we offer these comments on the draft Lander RMP/EIS.

The size and complexity of this draft RMP/EIS is much too large for us to absorb within the time allowed for comment. Thank you for the 45 day extension of time provided for comment.

The tone of the draft RMP is very disappointing as well as the reduction in livestock grazing. Alternative D is unacceptable due to the proposed loss of over 51,000 permitted AUM's or 18%. Any additional reductions in AUM should be determined at the permittee level. Not one time have we read that if a permittee does the right thing for the resource, the AUM's would increase. We think the permittee should be given credit for the last 20 years. Most of the permittees are working on developing an allotment management plan if they do not already have one in place.

On page 1483, the economic analysis of livestock grazing from 1989 to 2008 indicated an average of 73% of available AUM's were actually utilized. On page 435, from 2000 to 2006 it was documented as a hydrological drought. Most permittees took a temporarily reduced stocking rate during the drought. Also on page 435, it was stated that the BLM is constrained in the ability to monitor and implement programs to improve rangeland conditions by limited funds and the availability of personnel. This had a direct impact on other permittees as well as ourselves.

For our ranch, we have been working on developing an AMP for 17 years. This continues to be a work in progress requiring a huge time commitment from the permittee as well as the range conservationist. When BLM resources and personnel are pulled to other duties, as has occurred in the past seven years, the process is slowed.

We would like to see a definition of the term that is utilized throughout the RMP, “comprehensive grazing management strategy.” How does this affect the grazing permittee? What timelines does this new strategy hold? Does it replace or add an additional layer to what is already being done?

The Crofts family is committed to have the AMP done so that we can reactivate our suspended AUM's. Any business evaluation should not take multiple years to complete to continue business practices. It is our concern that if the new term “comprehensive grazing management strategy” replaces the current AMP, how many more years will it take to complete the process. This process should not be a continuation from one generation to the next in a family business.

On page 25, we find the quote “People opposed to the development of range project infrastructure say their public lands should be managed for maintaining other qualities such as open spaces, free of additional infrastructure on the landscape, and not just as pastures for cows.” We are an example, as are many other permittees, of good stewards of the land. Without proper care of grazing lands, our business doesn't exist. Our improvements assist wildlife, as well as cattle grazing and water improvements. Collectively, if ranchers fail to have opportunity to graze public lands, the economy of Fremont County and the State of Wyoming will be negatively affected. Agriculture ranks in Wyoming's top economic contributors, and of that the cattle industry is by far the largest component of Wyoming Agriculture, accounting for 64 % of all cash receipts in 2010, per WY Ag Statistics 2011. Considering that cash receipts turn many times in a community, loss of the rancher will harm our economy.

For the past century, Crofts Family members have been on the land and through generations have seen many changes. As private land owners that live near our grazing lands, we see the needs of our allotments on a daily basis and are able to address those in a timely manner. It is imperative that the Resource Management Plan that is implemented in the Lander Field Office Planning Area continue to recognize the contributions the ranchers give on a daily basis to care and concern for a renewable resource, grazing lands for livestock.

We look forward to answers to the question we have raised in your proposed action.

Sincerely,

Joseph and Deanna Crofts
Riverton, Wyoming