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Lander Field Office RMP/EIS
BLM Lander Field Office
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I am writing as a permittee on the Green Mountain Common Allotment and on behalf of the five other family members whose livelihood will be affected by this document. We offer the following comments on the Draft Lander RMP/EIS:

Our first comment is directed at the overall negative attitude towards the livestock industry in the preferred Alternative, Alternative D, and throughout this entire document. The RMP/EIS should not contain the non science based attitude that the overall health of the rangelands in the Lander Field office can be improved by primarily proposing a reduction in the permitted livestock AUM's. The reduction of AUM's along with the reduction in acreage available, the added constraint on range improvements. The added burden to all permittees affected by the decision proves the very negative impact on the livestock industry and the clear intent of this Field office to place more burden upon the permittees in hard economic times and thus run them out of business. The effects on the livestock industry and the local ranching community from these AUM reductions may not be seen right away, but as these family business loose their operations and are sold to be subdivided, the impacts that the RMP will cause to the culture of Fremont County will be a great loss of the historic ranches that the communities were founded on and supported by.

On Pg. 23, last paragraph, we agree that an RMP decision to close areas to livestock grazing without supporting data would be arbitrary and without scientific basis. However, we do not support the idea that a reduction in AUM's without scientific data is any less arbitrary towards the livestock industry, nor will it prove any greater increase in rangeland health as this document is assuming.

On Pg. 24, we are in great disagreement with the extensive language throughout this page stating that livestock AUM reductions are the best and only way to solve problems and conflicts across the entire Lander Resource Management area. This document has with a biased opinion singled out livestock grazing as the problem with all rangeland health issues on the allotments within this office. We comment that cutting livestock AUM's has no scientific data proving that it will resolve conflicts with other resources or rangeland health. It is thus an arbitrary action on behalf of the BLM to place such reductions in AUM's in this RMP and believe that in doing so all problems will be solved with no detrimental harm to the livestock industry. It is the duty of the BLM as defined by FLPMA to provide management on federal lands that will sustain the livestock industry, this is just a great a priority resource as the rest of the resources that the BLM is to manage.

On Pg. 25, paragraph 3, we comment that the BLM should not be insufficiently trying to convey the opinions of livestock grazing advocates on what is necessary to meet rangeland health standards. Furthermore, the assumption that additional infrastructure will come with a higher economic productivity on part of the BLM is without a thorough examination of the real economic cost and effect. As permittees on the Green Mountain Common Allotment, our family alone has developed five well projects in the past three years at no monetary cost to the BLM. Over the past ten years we have equipped several other wells on our allotment as well as building several riparian area enclosures at little to no cost to the BLM, we also continue to provide the maintenance on all these projects. The true economic burden is placed on the permittees to build and maintain these range improvements. The money that we use to equip these projects all goes back into the local economy where the supplies are bought and/or the people hired to build the infrastructures. The cost on average to equip one water well project is \$10,000, that is \$50,000 that has been spent in our local economy just from the five well projects that we recently equipped for livestock water sources to be able to utilize more forage and take pressure off the riparian areas, thus improving the health of rangelands. This is just a small portion of money boosting our economy from our allotment, not to mention the other areas on our allotment and the several other allotments in the Lander grazing district doing the same thing. If the BLM takes away the permittees AUM's, they are taking away the ability of the permittee to boost the local economy and support many businesses in Fremont County, thus causing a real loss in the economic input.

It is our experience on the Green Mountain Common Allotment that every water source that we have developed has been successful in dispersing grazing animals, thus reducing concentration and overuse to other areas of the allotment. Also, where riparian enclosures have been placed, horses and livestock alike are allowed use of these areas in a controlled fashion, stopping grazing during the growing/hot season and allowing it during the cool season when forage has reached its potential. In our experience horses have reduced the stubble height below the BLM requirements prior to and eliminating the rotation of livestock into that use area. This would be eliminated by strategically fencing sensitive areas that require more intensive management to meet BLM standards. It is unacceptable for the BLM to continue managing the livestock and shortening our season of use/livestock numbers based on the inability of the BLM to manage the horse utilization. If it is made acceptable for horses to graze an area, then the same area should be available for livestock and livestock should not be punished for the effects of the horses on the forage. Overall, range infrastructures provide great benefits to the health of the land by doing the following:

Providing new locations for all grazing animals to drink and forage by developing new water sources.

Providing rest to areas with natural water sources by providing offsite water.

Providing complete rest to natural water sources from both horses and livestock, by placing either permanent or temporary fencing around these areas on the BLM lands



On Pg. 25, paragraph 4, we comment that this entire paragraph be stricken or revised for the Final RMP as it is lacking in complete scientific data and only based on the opinions of a few individuals. The actual facts are that wildlife friendly fences are proven to not impact the movement of wildlife. The proof that wildlife do not have a problem going through fences or grazing with livestock can be seen every year as the deer, elk and antelope flood onto the family ranches to enjoy the pasture that has been irrigate and the hay that is being fed to the cattle. Therefore, the real impact to wildlife will be far greater when these ranches are forced into selling, because of the decrease in AUM's and increase in input, and many of them subdivided because of their prime real estate locations, the wildlife will not have the open winter sanctuary that they now enjoy. In addition, the range improvements that the permittees place on the BLM lands also benefit the horses and wildlife as they place water in new locations with better forage and horses and wildlife alike can use the wells as water sources.

My next comment is in regards to the "large segments of public that do not want to open multiple gates or see additional infrastructure." We would like to see the hard facts of these numbers of people complaining, because the #2 reason for people coming to Wyoming is to see the Cowboy and Ranching lifestyle and experience it fully. We know that hunters do not complain as we allow them hunting access on our private lands and they are mindful to close gates. In addition, the number of people seen actually walking the NHT in the Green Mountain Common Allotment is a small minority, on average each year I will see maybe 5 people walking the NHT, everyone else uses the main roads, which are not obstructed by gates.

As for the comment on "management of other resources besides pasture for cattle," We would comment that the livestock industry is the only resource within these allotments where the livelihoods of the families involved are personally impacted by the outcomes of BLM policies. Therefore, the bias of the BLM in this RMP towards the livestock industry shows the lack of understanding for what is given back to the economy for every livestock AUM that is run on BLM land. According to your table on pg. 1486, every AUM produces \$92.55 into the economy. If these numbers are true, this is \$1,110 that each cow produces for the economy yearly. This means that for every AUM that is lost per allotment, the direct impact to the economy has the potential to cost a loss of \$1,110 per cow every year. For this document to convey and assume that the loss of AUM's is not a great economic impact, shows that the real facts have not been fully examined. Collectively it costs us upwards of \$500,000 per year to keep our ranching operation in order, this number only continues to get larger as the price of supplies continues to rise. This money is spent here in Fremont County at the local grocery stores, the fuel stores, the local hay producers, the ranch supply stores, veterinarians, BLM, the local sale barn and numerous other businesses. Every AUM that is lost to the permittees is a direct loss to the economy, as the AUM's produce money to support our operations which in turn gets spent on the needed supplies for operation, boosting the local economy. During the hard economic times that our country is facing right now and the increasing loss of jobs, it is critical that every business that is self sustaining be kept in operation. The RMP should reflect the necessity of the livestock industry to the economy and the urgent need



to keep livestock grazing on public lands viable now and in the future and we are concerned to find that it is reflecting the exact opposite.

On Pg. 31, paragraph 2, Alternative D, we disagree with the narrative that states that range improvements will only be authorized under a “Comprehensive Grazing Strategy,” as this term is not clearly defined in this document, as to what it would entail or how long it would take to develop. Furthermore, the Final RMP should characterize exactly what an CGS is and how it will be developed. It is important to us as permittees to be involved in such processes that affect the land where my cattle are run and especially the ability to improve the usage of forage on my allotment through range improvements. We strongly advise the BLM to define the CGS in the final RMP and to work with the permittees, state and local governments when producing such documents.

On Pg. 35 under Livestock Grazing. we comment that there is no reference to where the numbers on this table are coming from or as to why these acres will be closed to livestock grazing. As permittees on the Green Mountain Common Allotment, our operation is greatly affected by any loss in AUM’s or areas of pasture. If the BLM plans to just cut the AUM’s across the board on all allotments, they had better have hard facts and evidence that the cut will automatically improve the rangeland health, which at this point you do not. Furthermore, the rest of the literature citing that further cuts may be made if the health standards continue to not be met is also alarming to my operation, if all rangeland health standards are going to be met by the reduction of livestock AUM’s, the cutting will never stop as there is no scientific data that proves cutting AUM’s will indeed increase the rangeland health, so it should come as no surprise when the rangelands have not changed due to the livestock reductions and a new plan will need to be put in place. We encourage the BLM to revisit the RMP and all literature that cites the livestock AUM reductions as the cure to rangeland health issues and come up with a more realistic, scientifically based plan that includes long term trend monitoring data for the final RMP.

With regards to the footnotes on Pg. 36, applying to the increase in acreage of suitable nesting habitat and the seasonal restrictions to be applied. It is in our understanding that the stipulations stated here in regards to sage grouse are not consistent with the Wyoming Governor’s Core area concept and Executive order. Since the lands that the Lander BLM office are managing are within Wyoming, the guidelines that are used for sage grouse in this document should be direct agreement with the Wyoming Governor’s Core area concept and Executive order. Also, the criteria should be the same between all the alternatives, it does not make sense to do otherwise. We also do not support the language that defines grazing as a “disruptive activity” in reference to sage grouse. It is well known that the Sweetwater watershed has the best sage grouse numbers, where the grouse have coevolved with herbivory. If grazing were truly disruptive the sage grouse would not have gone into extinction long ago, as grazing has been around as long as the grouse have. Grazing as a “disruptive behavior” should be taken out of this document.



On Pg. 37, start of table 2.4 ACEC, we do not support the increase of acreages to any of the existing ACEC's. The definition of an ACEC as defined by FLPMA is that an ACEC should only be applied to federal lands in situations where it is necessary to protect those lands from "irreparable harm." Nowhere has this document stated that any of the proposed ACEC's in this RMP are to protect the lands from irreparable harm. The reasons listed, wildlife, scenic values, etc. are not reasons of irreparable harm as these resources can be properly managed to provide uses for all of the multiple values and they are not under irreparable harm. Therefore, until the proof that there is irreparable harm is provided, no ACEC's should be proposed in this RMP.

On Pg. 53, paragraph 2 of Physical resources, we object to the literature of this paragraph that states the BLM will manage areas based on the aesthetic values of an area and the WSA areas. This is further proof of the negativity towards the livestock industry in this document and further proof of trying to use everything possible to remove livestock from the public lands when it is indeed the job of BLM to provide sustainability for the livestock industry on public lands.

On Pg. 55, bottom paragraph, we do not support the statement that Alternative D will increase restrictions on livestock grazing assuming that it will increase management practices to improve rangeland health. We also do not support the continued assumptions and literature that state a cut in livestock AUM's will directly and automatically improve the rangeland health. Nowhere in this document, nor in the Range Science Community is there any science based data to support this concept of a direct increase in rangeland health due to livestock AUM reductions. What research does support is that grazing with proper management is healthy for the plants and land as a whole. Therefore, making these assumptions in this RMP that will greatly impact our ranching viability is seemingly that the BLM is acting arbitrarily towards the livestock industry.

On Pg. 106, Special Status Wildlife, we comment again that the narratives in this section need to be changed to be in full compliance with the Wyoming Governor's Executive Order on the Grouse. Also, the restriction of water developments to only ones that improve grouse habitat is managing for only a single species, not multiple use management which is required of the BLM by Law.

On Pg. 111, 4121, we disagree with the suggestion of this RMP to remove or modify existing fences to allow free movements among herd populations, as it is not in compliance with the 1971 Horse Act, which states the BLM's horses should Not be managed where they did not reside in 1971. If horses are found out of their HMA, there should be an immediate action taken to gather the horses outside the HMA.

On Pg. 142, 6063, we comment against the statement that range improvements will be implemented based on CGMS as we do not know what this encompasses. Also, the literature stating to avoid projects that would expand grazing on the landscape without a CGS, this is again very negative toward the livestock industry, which is in conflict with the BLM's responsibility to provide for sustainability of the livestock industry dependant



upon public lands for livestock grazing. The livestock industry viability should be as much a priority of the BLM as any and all other resources.

On Pg 163,7007, we comment against the literature stating to not authorize projects within 3-5 miles of the NHT. We would like this to read in accordance with the NSO stipulations of a 3 mile controlled surface use to allow siting of range improvements along the trails and a ¼ mile buffer of no surface disturbance.

On Pg, 169, 7020, we comment that the BLM should not continue to manage WSA's under WSA management policy if congress releases those lands back to multiple use. The return of lands to multiple use should be effective immediately on the date of release by Congress.

On Pg. 221, Potential to limit new range improvements. we disagree with the statement that reads Range improvement must result in net beneficial outcome to rangeland health and it should be removed. There is no research to show the correlation between the effect on rangeland health and range improvements. One area of the allotment is not going to have an adverse affect on all other areas of the allotment as a whole. The BLM needs to develop a map to show where our allotment either passes or fails one or more of the Health Standards and how the BLM came to the conclusion. Once this happens, then we could work in cooperation on the areas that are failing and deserve priority from other areas. Range improvements could be a great improvement to some of the areas not meeting healthy standards by taking pressure away from areas that are heavily utilized because of water availability. We believe it is poor management practice for the BLM to manage the entire allotment based on a small percentage of the resource not meeting the healthy rangeland requirements.

On Pg. 1485, in Table L.8, it is not clear as to where these AUM's are coming from, are they including currently suspended, active and preferred AUM's of each permit and we comment that this needs to be clarified. We also comment that any further AUM reductions be considered temporary non-use.

On Pg. 1460, Allotment #32001, Green Mountain Common, there is not a breakdown of the AUM's, there are no cattle AUM's shown, only sheep. This needs to be clarified in the Final RMP.

On Pg. 995, bullet 13, we comment that if the BLM plans to close an area due to site-specific issues, they must consult with the affected permittees to evaluate the area to be closed and reach a conclusion in consultation with the affected parties.



It is important to note and take into great consideration that our family operation alone is currently supporting seven individuals who are dependant upon the BLM grazing permits in the Green Mountain Common Allotment as pasture for our cattle. Our combined family operation is currently running about 1,700 head on five permits in the GMCA and on the attached private lands when not in the GMCA. These cattle use the renewable resource of the forage they graze and turn it into a usable product by way of meat, leather, milk and many other goods used daily all over the world. In this difficult economic environment with global food scarcity, it is foolish for any government agency to stifle the efforts of small producers from bringing renewable resources to the market, which would be the result of an implementation of the policies contained in this Draft Lander RMP/EIS.

Thank you for considering my comments on this Draft Lander RMP/EIS. I would request that the BLM in the future consult with us and all other affected permittees when writing such documents, especially when they plan to impact the viability of our ranching operations so negatively.

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