

January 19, 2012

Frank Philp  
Philp Sheep Co.  
313 S. Hidden Valley Road  
Shoshoni, WY 82649

Lander Field Office  
Bureau of Land Management  
1335 Main Street  
Lander, WY 82520

Dear Sirs:

I am writing to express my views as well as those of Philp Sheep Company, a family owned Wyoming Corporation, on the Lander Resource Management Plan Revision.

My family has been involved in grazing and other multiple uses in the Lander Resource Area since my Grandfather immigrated to Wyoming from Scotland in 1907. Knowledge and wisdom of grazing and an appreciation of the land has been passed down in my family from my Grandfather and Father, John to me and my Brother and Sisters. The Lander Resource Management Plan very much affects us as our ranch and a ranch we lease are made up of several grazing allotments with intermingled private, state and federal land.

Wildlife that utilize habitat and water on private land are an important component of our ranch. We value the wildlife and our ranch is complementary to their wellbeing. Water development on private and federal land has benefited wild life for many years. We recently completed, with help of the NRCS, nearly 4 miles of pipeline with tanks to help with distribution of livestock. The project is entirely located on state and private land, deliberately avoiding Federal land. It does benefit wildlife however, on adjacent Federal land.

We have had inquiries at various times from people wanting "ranchette" sized portions of the ranch. We have not done that because of our concern for the affect it would have on grazing management and for our concern for the negative impacts on wildlife. Subdivision of ranches makes them less functional ecologically both for grazing and for wildlife.

We have allowed public access to our private lands and allowed public access across most of our private lands adjacent to Federal and state land. Only a small part of our land, near my brother's house is closed to hunting. We have allowed easements for natural gas produced on federal land to be transported across our private land. We have also donated without charge to Fremont County easements for county roads.

I am concerned that restrictions on Federal grazing will have an adverse cumulative impact on Philp Sheep Company. This is likely to influence future decisions about access and whether we would subdivide portions of the ranch. Subdivision of our private lands would negatively impact adjacent, intermingled Federal and state land. Intact ranches make Wyoming an enjoyable place by protecting open space. This document does not adequately address cumulative impacts to wildlife or to the enjoyment of open space by the public.

I have had a lifelong interest in livestock, grazing and range management. I graduated with a Bachelor of Science degree in Range Management from the University of Wyoming in 1970.

I have received awards for grazing accomplishments from the Wyoming Game and Fish Commission and the Wyoming Section of the Society of Range Management while serving as Chairman of the Midvale Grazing Association. Midvale Grazing Association manages grazing on Bureau of Reclamation administered land west of Boysen Lake in the Sand Mesa area.

Serving on the United States Department of Agriculture's Grazing Land Conservation Initiative (GLCI) National Steering Committee has given me a broad perspective of grazing across the country. I received recognition from the Secretary of Agriculture for my service at GLCI.

I am very familiar with the Lander Resource Area as my family holds grazing permits in the Lysite and Gas Hills areas of Hot Springs and Fremont Counties. In the past we have leased grazing rights in many allotments in Eastern and Southern Fremont County as well. Trailing livestock and helping neighbors gather has given us knowledge of most of the Lander Resource Area.

As an elected member of the Wyoming House of Representatives District 34 from 1993 until 2011 I am very aware of the importance of multiple-use and sustained yield of federal lands to the economy of the State. State and local Revenues largely depend on use of federal resources, especially Federal Mineral Royalties that are shared with the State. I learned through my Legislative service that many jobs and small businesses depend on the use of Federal lands and resources. This document seems to minimize the socio-economic affects of decisions like this on the economies of the counties and the State.

This is a very difficult document to comment on because of its shear size (about 1700 pages) and the lack of availability of hard copies. Additionally the computer disc I received contained a list of titles of maps but no maps. I respectfully request that the BLM start over and produce a document that is more concise, factually based and better organized. Hard copies of the document and maps should be delivered to grazing permittees and affected mineral interests.

Determining the cumulative affect of BLM management as a result of the management plan/EIS is impossible to determine because of the size of the document and the lack of hardcopy information.

I will attempt to comment on the document, but I do not believe anyone could realistically read and comprehend the entire thing within the short comment period.

Page 24,

The BLM's assertion that only 131,000 AUMs could be authorized without conflicts is arbitrary and reflects BLM'S bias against livestock in favor of wildlife. Historically wildlife has thrived along with grazing. Big game numbers in almost all areas in Wyoming are either at or above desired population levels, according to the WGFD.

Approval of improvements would be better done on a case-by-case basis at the allotment level rather than a "comprehensive planning effort " as BLM suggests. Most range improvements have minor negative impacts to soil and water but have many positive benefits to all resources. Water development, for example, always benefits wildlife.

Page 31,

The term "comprehensive grazing strategy" is used as requirement before improvement projects could be authorized. How long would this take to be implemented on all allotments? What exactly is this process and what is involved? I realize "comprehensive grazing strategy" is defined in the glossary but very little explanation is given as to the process involved or how one would be developed. (I will identify a potential error in the description of "comprehensive Grazing Management" in the glossary later in my comments.) There can be nothing "balanced" by this concept as is stated by BLM in this paragraph.

Page 48,

On this page the document asserts that "the BLM seeks to actively minimize adverse socioeconomic impacts" with Alternative B. Nothing could be further from the truth. Making it more difficult to develop resources can only be harmful to large segments of the population of the area.

Page 258,

Range improvements, while they may cause soil compaction in small areas in certain soil types, would have an impact on relatively small areas of the district. In large part range improvements would improve range conditions over large areas and thereby improve soil condition because of better distribution of livestock. Range improvements almost always improve livestock distribution.

Page 338,

Halogeton should be added to the list of potentially poisonous plants. I can remember several instances when we lost sheep after they grazed halogeton. I know of two occasions where cattle died as the result of eating halogeton.

Page 344,

Russian Olive is another introduced species invading cottonwood and willow dominated wetlands.

Page 358,

Predators, especially coyotes, have been largely responsible for the demise of the domestic sheep industry in the planning area. This has certainly caused large-scale conversions of sheep allotments to cattle or large amounts of nonuse in the case of the Green Mountain common allotment. This is a management problem for BLM and should be pointed out in the document.

Page 378,

The document states: "Wider dispersal of livestock grazing through range developments puts stress on upland range forage, providing competition to wild horses." This statement is completely erroneous and ignores the fact that horses also benefit from better, more uniform grazing by all species; rather than concentrating animals around a few watering sources. Horses actually could access more forage with the development of more water and would be dispersed away from riparian areas, which primarily occur, on private and state land.

Pages 385-386,

The document is correct in stating the problems (vandalism) were caused by improvements made to Castle Gardens by BLM starting in the 1970's. The BLM states:

At that time, it was thought that increased access and fencing would slow the damage, and a road, parking lot, toilets, picnic tables, fences around panels, and signs were installed. However, instead of decreasing the vandalism, the development caused it to increase. Today the site is damaged but retains much of its character and spiritual value.

I first visited Castle Gardens in the 1960's when almost all of the hieroglyphs were intact. I have been dismayed by the almost total destruction of this ancient art by gunshots and graffiti.

This document offers no solution to the most serious problem at Castle Gardens—**VANDALISM.**

Establishment of an ACEC will not stop the vandalism and will draw more attention to the area and attract more vandals to the site. The establishment of such a large ACEC on an area that is already fenced off (approximately 2 sections) from livestock grazing will do nothing to protect the actual site. This proposed ACEC should be dropped from consideration. Any "spiritual value" the site may have had has already been destroyed by BLM "improvements".

Pages 389-391,

It is impossible for me adequately comment on the historic roads and trails as there are no maps on the compact disc I received. The Bridger Trail does cross one of our grazing allotments and our private land but there are conflicting opinions and reports as to where the trail went. It did not cross the Bridger Mountains near what is now known as Bridger pass but it can still be plainly seen where it crossed the top of Copper Mountain several miles to the west.

This document seems to refer to Copper Mountain as Bridger Mountain in some places and Copper Mountain in other places. In the last 100 years it has been Copper Mountain. Recently BLM documents have begun referring to it as Bridger Mountain. We prefer the name we have always used, "Copper Mountain." BLM should at least be consistent in its documents.

The Casper to Lander road may cross one of our allotments but is impossible to comment on because of the lack of maps.

The "Yellowstone Park to Park Highway"--Is this a typo? I know of two different Yellowstone Highways. This name is used for the same highway in Casper. The first, North of Lysite, crosses several of our allotments and intermingled private and state lands.

My Father, John Philp remembers tourists in cars headed from the East to Yellowstone Park. He also recalls one enterprising rancher who lived at the bottom of a steep gumbo hill. When it rained he would augment his income pulling cars of wealthy tourists up the hill with a team of horses.

The second Yellowstone Highway that I know of ran from Casper to Moneta and on to Shoshoni across the divide between Badwater Creek and Poison Creek south of Lysite. Again without maps the affect on my family and Philp Sheep Company is impossible to determine.

Page 392,

Listing Cedar Ridge as an ACEC will only attract vandals and looters and result in the same destruction as has occurred at Castle Gardens.

PAGE 484,

THE EIS STATES "...ranching today makes a relatively small contribution to the economy IN the study area..." This statement could not be further from the truth. I would ask the BLM to check current prices for livestock, which are at or near record highs, with strong demand for beef, lamb and wool both in the US and from abroad.

The BLM should refer to studies of the value of AUM's to the area's economy by Dr. Tex Taylor of the University of Wyoming College of Agriculture Department of agricultural Economics. The work clearly showed that ranching has a large contribution to the economy of Fremont County.

Page 995,

Under the fourth bullet I would comment that all improvements are not surface disturbing.

Rangeland monitoring should be scientifically sound, measured over time to determine trends and should not be limited to stubble height and or utilization.

Page 995,

There should be clarification by BLM at the allotment level what permitted use numbers are and whether nonuse is suspended or by agreement with the permittees.

Page 1014,

Grazing management as described under Alternative D would be linked to "a Comprehensive Grazing Strategy." I looked this up in the glossary (page 1320) to get some understanding of what Comprehensive Grazing Management is.

The second sentence of the description on page 1320 does not make sense. I believe where it says, "species intensified" it should read, "species identified."

Even with that change it is hard to know exactly what this process is, how it is established, who is involved, or if it has ever been done. This document gives very little explanation of what comprehensive grazing strategy is. I cannot evaluate the affects of "Comprehensive Grazing Strategy" with the information given here.

The BLM has not been able to implement AMP's on a widespread basis so I wonder how they will implement this new process when they seems to be difficulty even with the renewal of permits on a timely basis.

After reviewing this plan I support Alternative C. Even so, I am dismayed at BLM's utopian view expressed. The BLM goes so far as to tout the success of one private company (National Outdoor Leadership School). It is commendable what NOLS has

done, but BLM then seeks to minimize the contribution of ranching and the hundreds of jobs and the economic stability provided by animal agriculture to the local economy.

The BLM even defines livestock roundups as “disruptive activity” to cause further harm to ranchers. I am concerned that herding of sheep or cattle would be construed as disruptive. Herding of livestock is an absolutely essential management tool. The inability to have roundups on a timely basis would seriously harm the resource and cause undue economic loss to the ranchers. I should not have to explain that roundups and herding are essential for good animal husbandry and timely marketing of animals.

I cannot overemphasize the importance of consideration of the Fremont land Use Plan. It has had extensive public input in it’s development and should be given utmost consideration in furthers versions of this plan. I did not see any evidence that any county land use plan had been seriously considered in development of this document.

Federal law requires consideration of county land use plans and cooperation with the county. Most of the impact of this plan is on Fremont County. Fremont County Commissioners are, as duly elected officials, the closest government to the people and should be given full cooperatoor status as provided for in law. It is hard to find any recognition of Fremont County Commissioners or the Fremont County Land Use Plan in the Lander Resource Plan draft EIS. I support the input of Fremont County Commissioners to this document.

I also would support comments by the Central Committee of the Wyoming State Grazing Board who represent the views of livestock grazers.

Thank you for the limited opportunity for me to comment for myself, my family and for Philp Sheep Company.

Sincerely,

Frank Philp  
Vice-President  
Philp Sheep Company