

January 20, 2012

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

Dear Lander Field Office:

Wyoming Farm Bureau Federation (WyFB) represents more than 2,600 agriculture producing members. Our comments regarding the Lander Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) address the concerns of our members affected by the management of BLM lands; and support the policy they have adopted to address the management of BLM lands in Wyoming.

Livestock grazing is an important tool for reaching and maintaining rangeland health. Grazing and the range improvements that come with it tend to increase life enhancing opportunities for wildlife, livestock and the humans using the landscape.

Animal Unit Months decrease over time under every alternative (Table on page 221; Chapter 2 and on page 1000 Chapter 4); and the discussion about range improvements is confusing.

All alternatives have the potential to limit range improvement projects. This seems counterproductive – isn't improving the range the goal? Slight to moderate disturbances created by the construction of range improvements can be, and are, far outweighed by the long term benefits of well thought out improvements. The fear of these short term disturbances seems to be all that is needed to say no to improvements. Improving the range with fencing, water facilities, cover and foraging areas, etc. benefits all uses and users. How do you lose AUM's by improving rangeland health? Creating access to previously under utilized areas of rangeland is beneficial to wildlife as well as livestock. Increasing the acreage of forage and habitat availability would seem to be a management goal.

In the preferred Alternative (D), a new concept is introduced: a 'Comprehensive Grazing Management Strategy' (CGMS) will have to be in place to develop range improvements such as water development or fences. There is no reason for this extra layer. The Allotment Management Plan is the grazing strategy agreed upon by the permittee and the BLM; the CGMS looks like a way to discourage the construction/implementation of range improvements – something that would seem counter to the goals laid out this country's land management laws that govern your actions.

We request a table be included in the Final RMP stating the preference level of federal AUMs that were adjudicated to the private lands serving as base property for grazing permits. There should also be documentation of the amount of suspended AUM's that may become available in the future. AUM's in each category (preference level, suspended use, if any, and the active use level for all allotments) need to be included in the final RMP.

The draft document makes some assumptions that are unwarranted. It is not within your authority to decide that ranching is a declining industry – especially not when the management actions taken by your agency can make that a pre-determined outcome. Deciding people who move

here or buy ranches here will not have so much use for grazing land is also not under your authority or even necessarily insightful – how do you get to this conclusion? (page 995; Chapter 4).

Our members in the area have voiced the opinion that there are too many special designations for land in the Lander BLM. We agree. Wilderness Study Areas, Areas of Critical Environmental Concern; Wild and Scenic Rivers (we oppose this proposed designation on sixteen miles of the Sweetwater River); buffers for view sheds (5 mile view shed requirements for both sides of the Oregon Trail are extreme). This protection of ‘viewsheds’ after more than 100 years of continuous use by wildlife, livestock and humans doesn’t make much sense. The huge buffer zones also affect private lands – protecting views on private lands does not fall under your authority. These and other designations remove land from most uses or constrain uses through special management schemes. We feel that generally there is not enough scientific data to actually justify the withdrawal of these specially designated lands from active management producing needed goods and services for our locally affected communities, the state of Wyoming and eventually the nation as a whole.

BLM must work with local governments to ensure that management strategies complement the affected county’s Land Use and Management Plans. The county plans should be included in the Resource Management Plan for the Lander Field Office. The local governments are the best equipped entities to protect the history, custom, culture and economy of the counties affected by this RMP. Continuing to work with permittees developing creative and innovative allotment management plans will go a long way toward reaching the goal of healthy rangeland.

The job of Wyoming Farm Bureau Federation is to protect agriculture in this state; take appropriate actions to protect private property rights and help our members to achieve an equitable return on their investment in production agriculture. As such we are expressing a preference for Alternative C.

Natural resource use and management is the economy of the area. Agricultural use; timbering; oil and gas exploration and development; water development and all other rangeland uses have been historically employed in the area. Consistency of management with local governments and citizens using these lands for their livelihoods or personal enjoyment is demanded by federal management laws; citizens living in communities affected by the management of these lands should expect no less.

Sincerely,

Suzy Noecker
Field Services & Public Relations Director
Wyoming Farm Bureau Federation