

January 19, 2012

Dustin Citron
Stacia Citron
317 Agate Flats Rd
Rawlins WY 82301

Bureau of Land Management
Lander Field Office
Box 589
Lander WY 82520

RE: RMP/EIS

To Whom It May Concern:

We are a small family operation that turn out cattle in Allotment #1636, Allotment #1625, and have in the past had interests in several other allotments in the RMP study area.

We would like to first note that the scope of this document makes it nearly impossible to give interested public time to comment, even with this extension. The limited available format to the public will have a significant impact on responses, especially from the livestock industry. We submit this document could have been greatly simplified to save time, paper and resources to all involved, to ensure the public and multiple-use interests could equally contribute.

One of our allotments, Granite Mountain #1636, has not had an Allotment Management Plan in place. The permittees held up their end of the agreement from 1993, however, the BLM has not done their part, so as a result, we feel the 1993 agreement is voided and are awaiting a new plan. It is impossible to comment properly on this RMP without completion of the AMP.

We find this entire document to be extremely biased against livestock grazing. This could be construed as a deliberate tactic to sway the public against this industry. We believe this is an extremely unprofessional method. This includes labeling Alternative D, an alternative particularly disruptive to our business, as the 'preferred alternative'. Comments on **page 4** about 'emerging concerns and aging population' in the ag community are not only false, but degrading and should be stricken from this document.

The Farm Bureau Young Farmer/Rancher Program and many other programs through Farm Service and Farm Credit Agencies have provided assistance to an increasing number of young people starting out in the livestock industry. We ourselves are both under 40 raising children that choose to adhere to this lifestyle and we are surrounded by neighbors that are younger and many others far from retirement. This statement appears to be an attempt to justify reduction in AUM's, when no other reason can be found.

Throughout this document, paragraphs begin with citings of 'a citizen suggested' alternative to removal of oil and gas and livestock grazing, but nowhere in this document does it cite 'citizen suggested' promotion of livestock grazing or oil and gas, though we are all aware many supporting these industries have made these suggestions. This just lends toward the overall bias of this document.

On **page 23**, the idea that closing certain allotments to 'resolve conflicts' suggests that all conflicts can be resolved by this action and is grossly misguided. There are no studies to prove that doing so would resolve any conflict. In essence, the livestock industry has become the 'whipping boy' for every disagreement on public lands. Grazing reduction or closure seems to be a priority of this department, yet grazing is not the problem. For example, feral (so-called *wild*) horses are extremely detrimental to grazing and riparian areas, yet their management does not seem to be a priority.

The statement on **page 25** that propose 'high stocking rates that require intensive management ...or improved rangeland health by much lower stocking rates' is another extremely biased and leading statement that has no basis in fact. All prejudice comments of this nature should be stricken from this document.

It is not acceptable to state that 70,000 acres are non-negotiable, plus now another 13,000, with no explanation. You choose to analyze allotments based on a short-term riparian area study, yet lump 83,000 acres into 'resource conflict'? The problems in these areas *must be specifically identified*. The term 'resource conflict' is inadequate and does not identify actual conflicts, or which resource, but seems to be the 'go to' term for removal of livestock grazing. Considered 'problem areas' should be mapped so this agency, permittees, and any interested public can work to improve them- that is if the interest of this agency is actually to improve conditions and not just remove livestock.

There are many terms in this document that seem to be blanket terms with hazy definitions. 'Resource conflict' is one; 'resource concerns'(which allows the majority of allotments to fall in the 'I' category); also 'disruptive activity'(which seems only to apply to livestock grazing, not to wild horse grazing, hiking, rock climbing, four wheeling, hunting, or any other 'recreational' activity); 'best management practices', and 'viewshed'.

'Viewshed' is subjective. It is a personal opinion, essentially-'beauty is in the eye of the beholder'. Some people like rocks and desert, some prefer to see mountains and trees. Some people like to see animals of any kind, including cattle, grazing and living in their natural environment. We consider old corrals and windmills ('rangeland improvements'),

a symbol of this area's history and culture in the cattle industry, a worthy 'viewshed'. Regulation based on this arbitrary term would be the same as government regulation of the Arts. It is another term that is too broad and has the potential for misuse by the administering agency.

Table 2.3 on page 34 and 37 shows a dramatic increase in protected acreage for Sage grouse in Alternative D. We believe Sage grouse should not be included in an ACEC. An ACEC definition states that it is to be used if threatened with 'irreparable harm'. Nowhere in this document or in any research does it show the potential for 'irreparable harm'. Somehow this term has become interchangeable with 'resource concerns'. This should not be. We have the largest sage grouse population in the country, clearly suggesting that grazing and multiple-use has little effect on their habitat.

Pg 55 in Alternative D suggests the removal of fences that prohibit wild horse herd movements. This should be unnecessary, as they are supposed to be in pre-existing management areas which should not change according to this proposal. Issues with 'herd health' should be based on sustainable herd numbers and not how far they can travel.

The statement on **pg 896** saying that rangeland improvements automatically have an adverse effect on wildlife is a false generalization. Wildlife in general has greatly benefited from operator maintained water improvements and shelter. We also provide 'critical winter habitat', the majority of which is on state and private river-bottom land.

M, I, C **pg 1448-'C'** ...riparian/wetland areas adversely affected by livestock grazing.' Feral horses do more damage to a riparian/wetland area than domestic livestock. Wildlife can also over-use riparian areas. Rangeland improvements, including fencing, have been proven to have a positive impact on riparian areas, but are under-utilized by this agency. Any land in any of these designations should be mapped and areas of concern selected for case-by-case enhancement.

According to **Table K-1, pg 1448-** Suspended AUM's are not included in the total AUM study. All cattle, horse and sheep permits should be included, as they were in the previous RMP. Our allotment is already at 53% of its original capacity, and it is not acceptable to use 47% as a starting point for further reduction.

Table K-2, pg 1463-The #1636 - 'I' designation in this allotment, or in any allotment for that matter, should be specific to each area of concern. An arbitrary term in such a large area needs to be backed up by *unbiased* scientific data to ensure this term is not abused. *An entire allotment should not be failed in any standard based on one small short-term study area.*

The amount of economic impact in our county and state based on a reduced grazing program is greatly underestimated. In our allotment alone, a 35% across-the-board reduction can potentially result in a 2.5 million dollar reduction of money in Fremont

County in one year. Considering our allotment is already at 53% from previous years, there is a significant amount of monies lost to our county and state over the last 20 years. *We propose that the drop in numbers from the 'aging population' is actually a BLM-induced event because of the economic impact to an operation by the steady reduction in AUM's.*

We submit that a whole management plan rather than an automatic reduction in numbers would have a greater impact on the health of rangeland in general. There is no evidence to support an across-the-board reduction will improve health, though there is plenty of data to support a management plan. I believe Fremont County's plan for rangeland health is a better alternative. Perhaps closer consultation with Fremont County Commissioners, State Grazing Board, Conservation Districts, and permittees would save time and resources in the future.

Without the use of these lands, we could not continue our culture's long traditions of living in the west and raising our young family on a ranch. A simple fact is misuse of the land would have a negative effect on our business, wildlife, and the economy of our county and state, so good stewardship is a reward for everyone. We also appreciate wildlife and the recreational aspects of this land and gladly share with others, but have difficulty constantly defending our livelihood against someone else's desire for amusement.

If livestock grazing was viewed from an unbiased perspective, this agency could see the service it provides such as habitat and water resources for wildlife, and the livestock owners pride in guardianship of our natural resources, general stewardship of the land and protection of a historic and beloved way of life. We ask that this document be re-evaluated with a fresh and unbiased approach to whole rangeland management.

Respectfully submitted,

Dustin Citron
Stacia Citron

Jeffrey City, WY

Electronically submitted by Stacia Citron