

Armada Ranches, LLC
Rob Crofts
458 Graham Road
Lander, WY 82520

16 January 2012
Lander BLM
Attn: RMP Manager
1335 Main Street
Lander, WY 82520



RE: Lander Plan Comment

Dear BLM,

The Lander Resource Area is primarily composed of Fremont County. Therefore, impacts will be greatest here in Fremont County.

It appears to me that the Plan will reduce available grazing preference by 28%, not the 18% that the Plan uses for a starting point in the economic analysis. A reduction of this size amounts to 78,400 AUMs (Animal Unit Month). From your document, Table L.9, p1486, and using a \$92.55 value per AUM with a multiplier of 7, as opposed to the 2.07 BLM uses, the annual impact to the economy of Fremont County would be \$50,489,600.

Studies completed by the University of Wyoming under Taylor and Thompson indicate that multipliers of this magnitude are appropriate when analyzing AUMs.

It appears that Plan makes range improvements difficult and is not designed to contribute to the ranching economy.

I hope that you reexamine your multiplier and reconsider your desire and need for a reduction in AUMs.

Sincerely,

Rob Crofts

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