

Pokorny Ranch FLP
Timmetry (Pokorny) Hellyer
99 Coal Mine Road
Lander, WY 82520

January 16, 2012

Lander RMP Planner
Kristin Yannone
1335 Main Street
Lander, WY 82520



Dear Kristin,

I am writing this letter to comment on the Draft Lander RMP.

I am the second generation of my family to ranch on our ranch east of Lander. I ranch with my Dad, Mom, younger brother, and my children. We are a cow-calf operation; we calve our cows in the spring and they grow their calves throughout the summer on range grass. In the fall the cows and calves return to hay meadows at our headquarters and the calves are weaned and sold. The cows graze on the hay meadows and we feed hay throughout the winter and spring months. Our ranch is our family business and in addition to financially and socially supporting our families, it also plays a vital role both socially and economically in our community.

My comments are concentrated on the following identified issues:

- Lands identified for disposal

On Maps 94 and 95 of Appendix B, DRMP, 160 acres of BLM lands are identified for disposal. The acres to which I am referring are in Sections 25 and 26 of T33N, R99W. These identified lands comprise the Blue Ridge Allotment #1813 and that allotment is held by the Pokorny Ranch Grazing Association, which is owned by our family ranch - Pokorny Ranch FLP.

The identified lands are fenced into our ranch and are used by our family to graze our cattle. The lands have been fenced into the ranch for many decades. These lands do not have public access; they share a border with a parcel of State of Wyoming land, but even the parcel of State Land is land locked and neither the State Land nor the BLM land that we are referencing has any public access via public roads or public land. Attached is a map of the ranch boundary.

The topography on the identified land is mostly ridges and steep hillsides with rangeland vegetation. There is no water on the identified land. As mentioned before, we use the land in our livestock management program, but we also use it in our management for wildlife and open spaces. If the land is acquired by a third party an additional fence would have to be added to the

landscape to contain our cattle or prevent outside livestock from entering our property. The additional fence would have to be at least 1.25 miles long.

If the identified BLM lands are to be disposed, we would like to acquire them because of their location within our ranch boundary and the role they play in our management program. We would entertain purchasing the land from the BLM. Alternatively, we would be willing to work through a plan to trade a portion of the land that is located in Coal Mine Draw, R98W, T33N, Section 8 S1/2NE1/4 which is used for recreation by the public.

- Recreation and Public Purposes Act Lease – Government Draw Coal Mine Draw

Record # 6105 on page 153, DRMP references the Coal Mine Draw Area. This Record identifies approximately 1,300 acres of land that is proposed to be used as “a cross-country OHV and intensive target shooting area.” A small portion of this land is currently used by the public for shooting and off road vehicle activities and it is currently heavily utilized. If this land is to be advertised as an “intensive” use area it will cause many health and safety concerns, as well as private property rights issues for the surrounding landowners.

Private landowners will endure additional noise pollution due to more intensive shooting and off road vehicle use, and potentially the additional nuisance of the intensive recreational area will have a negative impact on land values for the adjacent private land owners.

Health and safety concerns include increased traffic on Coal Mine Road – a dirt county road which can not be adequately maintained when it is exposed to extensive travel in wet and muddy conditions - the conditions in which many OHV users prefer to recreate. Currently, the use of Coal Mine Draw for off road vehicles has created large areas of bare ground and during wind storms it creates large dust clouds. Increasing the intensity and volume of traffic in this area will only create more larger areas of bare ground that will add to the dust (page 1518 DRMP indicates that the area of bare ground could grow to 1280 acres). Given the level of scrutiny the Lander RMP affords Air Quality in the planning area (4.1.1. Air Quality, page 539, DRMP) it seems absurd that the BLM would suggest concentrating recreation is such a way that dust (particulate matter) would occur at an exponentially higher rate than if the recreation were more dispersed.

Intensive target shooting provides an even larger threat to the people who live in the area. The current levels of shooting already occur during all hours of the day and night, increasing the amount of shooting puts both the recreationalist and the local landowners at risk for injury, or even death. Intensive use by OHV combined with an intensive use for shooting is a recipe for danger – public safety will be compromised.

The potential for lost AUMS to the Government Draw Permittees is also a genuine concern: our ranch is a permittee in this allotment. We do not desire to surrender additional grass for grazing cattle to intensive recreational purposes. Furthermore, eliminating these acres from the grazing plan of the Allotment can potentially disrupt the dispersal and grazing of the cattle, as well as



disrupting the management practices of the permittees. As the intensive recreation progresses, vegetation will be lost and erosion will become more pervasive.

Furthermore, this intensive recreational area falls within the core sage grouse management area. With the scrutiny that the area already incurs due to its active sage grouse habitat, I am amazed that the BLM would entertain such an intensive use of the designated core management area. If the BLM views intensive OHV recreation and an intensive shooting area as harmless to the sage grouse, then it only makes sense that range improvements and all management activities of livestock grazing should also be harmless to sage grouse.

Advertised and promoted increased shooting and OHV, off road vehicles, in the Coal Mine Draw area will cause an undue and unnecessary risk and nuisance to the landowners in the area and to the permittees in the Government Draw Allotment. OHV and shooting recreation should continue to be a more dispersed activity instead of an intensive use of the land.

- “Changing demographics such as an aging population in the livestock grazing industry” (page 4 DRMP)

The age of ranchers is not a relevant topic for any decision making conversations that happen within the planning process of the Lander RMP. Ranchers age at the same rate as all other classes of people and as they become an age where they choose to no longer ranch, then transitions will be finalized – transitions that are often already in the process of moving forward.

On my own family’s ranch, I returned to the ranch - our family business - after earning my degree at the University of Wyoming. I also have a younger brother who has plans of returning to the ranch when he is older. Our parents are the controlling interest in the ranch, but the process has already begun for the transition from my parents to the next generation. Likewise, when my children are old enough to return to the ranch they will potentially be the next link in our generational ownership. In the valley where we ranch, every working ranch has one or even two generations in line for the transition from an older generation to a younger generation.

Furthermore, if the BLM is sincerely interested in the age of ranchers and the entrance of younger people into ranching, then the logical approach would be to reduce the rules and regulations on grazing, instead of increasing the regulations and decreasing the AUMs available for grazing over the next two decades. The proposed decrease in AUMs will not encourage any young people to be involved in ranching because the decrease in AUMs equates to a decrease in the businesses ability to be financially viable – declining businesses are not profitable businesses and there is little incentive to work in a business that is not profitable.

A decrease in available AUMs will not only discourage young people from entering the ranching business, but it will be potentially fatal for many ranches. If ranches fail economically they will also cease to provide so many of the benefits that an economically viable ranch contributes to the community, including: a substantial contribution to the local economy, open spaces, wildlife habitat, and desirable viewsheds.



- “Proposed ACECs” (page 465, DRMP, Table 3.61.)

Proposing new ACECs for the purpose of protecting the sage grouse is an unnecessary and burdensome proposition. There are many measures already in place - including all of the rules covering the core sage grouse area - which are intended to protect the sage grouse. Adding an ACEC to protect the sage grouse essentially paralyzes any further range improvements within the area and does not take into account that the State of Wyoming has already taken the necessary steps to create rules which are intended to benefit sage grouse and sage grouse habitat.

- “Management decisions on BLM-administered lands have the potential to impact surrounding communities and state and private lands, and the BLM must consider such impacts.” (page 473, DRMP)

There are many convincing and important reasons for the BLM to want to help work towards the economic health of local ranches.

The ranches which graze cattle on BLM lands are the same ranches which provide life sustaining habitat for wildlife through all seasons of the year. Wildlife such as sage grouse, pheasants, deer, antelope and elk, as well as countless other species, all benefit from the open, managed lands of these ranches. Our ranch implements many practices such as irrigation, crop lands, water development and grazing which are meant to benefit cattle and are also beneficial to wildlife. Also, these ranches, collectively and on a singular basis, provide open spaces and view sheds which benefit the public. Countless acres of private deeded land are left undeveloped and open to viewing by the public because these acres are a part of a working cattle ranch.

Furthermore, these ranches are all businesses which contribute to our local economy. While the BLM categorizes each ranch as a “job” (page 1185, Table 4.49), it is important to note that they are full scale businesses. Our ranching business, like countless others, adds hundreds of thousands of dollars to the local economy each year by purchasing vehicles, equipment, parts, supplies, fuel, fertilizer, groceries, livestock supplements, hay, paying taxes, and the list goes on and on....

The beneficial contributions of ranches to the lands managed by the BLM and to the surrounding landscapes are noteworthy enough that the economic viability of ranches should be at the forefront of decisions made by the BLM and the future plans laid out in the RMP.

Decreasing permittees’ ability to make range improvements (including water development and fences); decreasing AUMs available to ranches; and increasing rules and regulations all work to erode and destroy the economic viability of these ranches. Thereby, eroding the benefits that economically viable ranches offer to our communities and the public.

The current tone of the Lander Draft RMP offers no balance to the necessary components of multiple use on BLM-administered lands. Grazing on these federal lands contributes



exponentially to the success of the landscape and the success of the management plan. The management of grazing must follow reasonable protocols that allow our ranching businesses to remain economically viable and continue to contribute positively to wildlife, open spaces, view sheds and our economy.

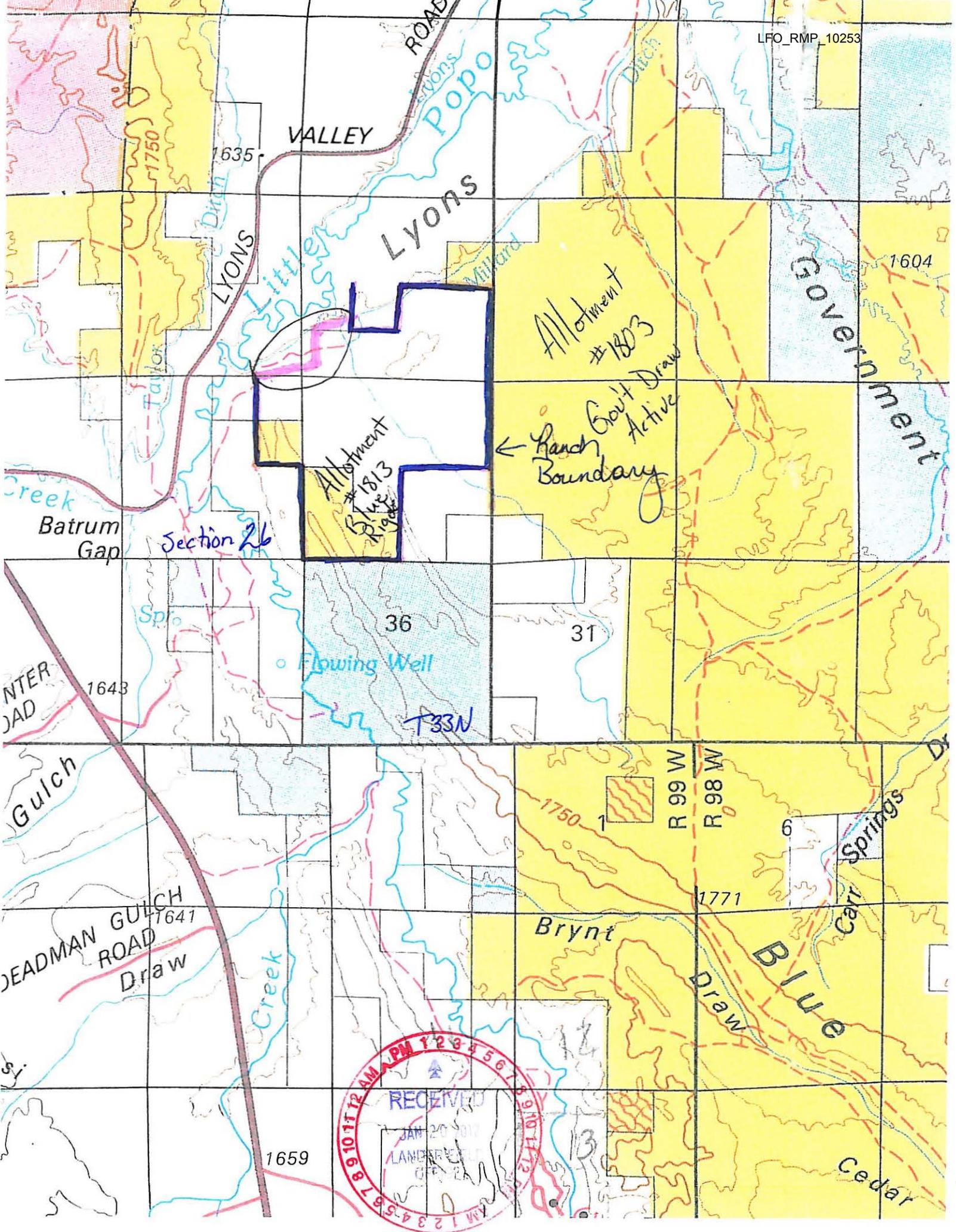
Please feel free to contact me if you have any questions. I look forward to meeting you.

Sincerely,



Timmery (Pokorny) Hellyer
For Pokorny Ranch FLP
(307)349-2297





VALLEY ROAD

LYONS

Government

Allotment #1803

← Ranch Boundary
Govt Draw Active

Allotment #1813
S. 1/4
R. 1/4

Section 26

Batrum Gap

36

31

Flowing Well

T33N

ENTER ROAD

Gulch

R 99 W
R 98 W

DEADMAN GULCH ROAD
Draw

Brynt

1771

Draw
BLUE

Cedar

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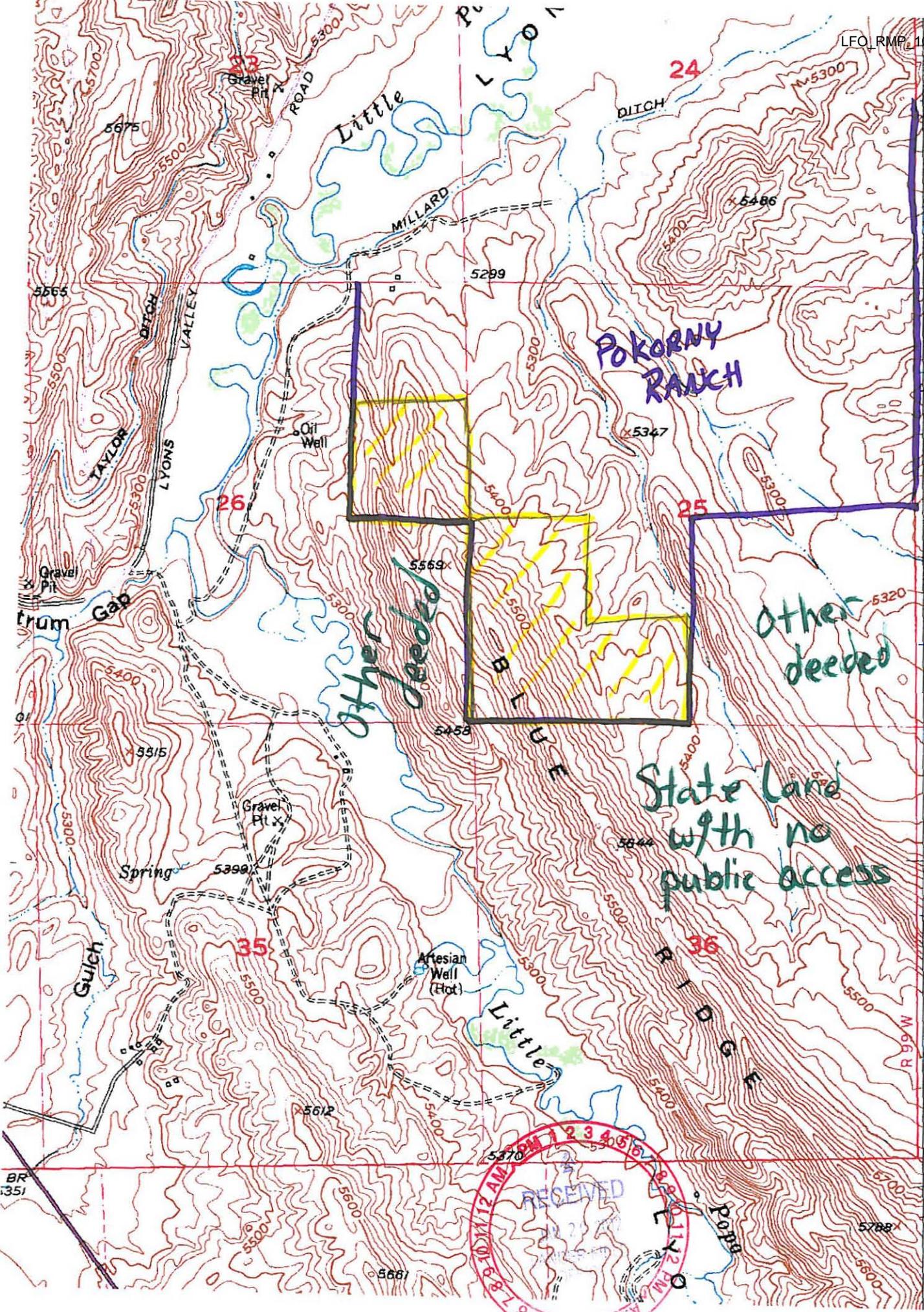
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