

Bureau of Land Management
Lander Field Office

attn: RMP Project Manager



My preferred Alternative is A, or perhaps a combination of A & C.

Page 30, Alternative A, establishes rangeland improvement projects on a case by case basis and establishes allotment stocking rates to maximize the utilization of forage in areas preferred by livestock while achieving standards. Things have changed but there is room in this alternative to meet these changes. It seems like when the BLM starts making changes it is anti-ranching. Alt A allows livestock grazing on 2,324,934 acres. The BLM presently authorizes 280,813 AUMs, page 1484. The other alternatives want to reduce AUM's to solve the range problems. Page 221, shows the total permitted AUM's lost, and Alternative A shows 1,414. Ranchers need to be able to use all their permitted AUM's to keep their ranches sustainable and to help the local economy, page 223. Cattle numbers have never been the problem. Grazing management practices (tools?) are the answer we need to be working toward. Page xiix the primary impacts to livestock grazing result from management that alters the area available to grazing, constrains the placement or types or range improvements, changes the number of AUM's available to cooperators, alters rangeland health, or changes the cost associated with livestock grazing management. Alternative B would result in the greatest adverse impact to livestock grazing. Alternative A would apply management on a case by case basis.

Horses

Page 41, Alternative A, does not establish scenic loops for wild horse viewing.

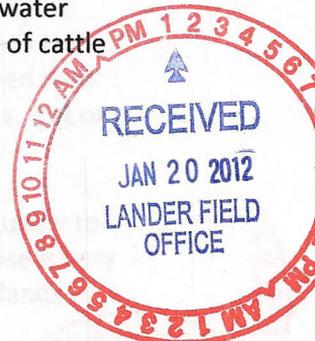
Page 111, Alternative B, wants to establish a scenic loop, what restrictions will be in place for scenic loop for Antelope Hills to Cyclone Rim. We don't need this loop. There are plenty of roads available to see wild horses. Is the BLM going to fence and provide water for horses in the scenic loops so the public will be assured to view a horse? The horses don't usually stay near roads. The horses can be viewed sometimes now.

Page 375, the management levels for wild horses must be kept in control by roundups and every 4th year the mares should be vaccinated. I'm not sure what is meant by scenic viewing loops? Page 378, there is ample room for horses on upland forage even if range developments were approved which could put more grazing on the uplands. The horses could benefit from the water developments. There would still be forage for winter.

Riparian

Page 1445, riparian – an area of land directly influenced by permanent water. It has visible vegetation or physical characteristics reflective of permanent water influence.

Page 343, riparian-wetlands make up less than 3% of the BLM administered lands and are important to wildlife and non-game species, but I believe that BLM puts too much importance on these areas. I'm concerned that the 3% riparian acres control the management of the other 97%. I believe the BLM should fence the riparian areas and build spring source protection fencing. The fences could be built so as to protect the riparian areas while providing water for livestock, wildlife, horses, grouse, etc. I know cattle/horses like the riparian areas in the hot season but will move to upland forage when it cools off if given the opportunity and not kicked off the allotment. If the cattle were allowed to scatter themselves there would be smaller groups to drink on the riparian areas and not as much trampling. The water projects could be smaller and cheaper to build and maintain, instead of herding large bunches of cattle to projects that can't handle large bunches.



Pages 758-762, major adverse impacts to riparian resources arise from surface disturbances associated with mineral resource development, motorized vehicle use, road construction and grazing. Impacts from wildlife and wild horses are more localized and site specific than the broad impacts from cattle grazing. BMP's can address these impacts, also rotational grazing and fencing.

Wildfires

Page 710, Alternative A lets the public use the forest products and allows timber sales. Management of forest insect and disease outbreaks are implemented on a case by case basis. Something needs to be done with the beetle killed timber and that can happen with Alternative A. Full suppression of wildfires is likely under Alternative A. I'm sure USFS also has a say in forest management.

Energy

Page 711, most of the planning area remains open to oil and gas and other mineral development. We need more oil and gas development to help the U.S. be more independent and to help the local economy. Alternative A also has most of the planning area open to wind energy, but I heard on the radio December 2011 that Fremont County wasn't a county that was being considered for wind energy.

Page 24, livestock grazing management actions are designed to enhance rangeland health, improve forage for livestock and to meet other multiple use objectives. Livestock grazing is a FLPMA authorized use of BLM administered lands.

Page 64, Soil Reclamation requires that a site specific reclamation plan be developed and approved prior to any BLM authorized surface disturbing and disruptive activity. Soil management is identified in the Wyoming Reclamation Policy and is not an RMP decision.

Alternative B&D have so many restrictions that at times it sounds like the BLM doesn't want the public to enjoy the public lands. The public has been doing a pretty good job of using and protecting the public lands.

Page 484, states that ranching today makes a relatively small contribution to the economy in the study areas, it is an important part of its culture and history. However on page 496 it states that Fremont County had the highest inventory of cattle 105,000 in 2007. Seventy four percent of Fremont counties farming and ranching income is from livestock and livestock products. A University of Wyoming 2000 study showed that the average Wyoming ranch activity generates about twice as much income for community services as if requires in expenditures from community services. So the above statement is confusing.

Page 433, states that the riparian-wetlands in the Atlantic City common allotment has improved with increased water flow and holding capacity, along with new willow growth and stabilized banks. Yet on page 1468 you say that the allotment is not meeting standards, I'm wondering why?

Page 428, livestock grazing is an authorized discretionary use of public lands by people who qualify to hold a grazing permit/lease under federal grazing regulations. Holding a grazing permit or lease is very important for most ranching operations in the summer time since there is little or no private lands available to lease.



Page 47, Alternative B, allows for the establishment and management of future common forage reserve allotments and on page 50 acquired lands are available for grazing. I'm not sure what these two statements mean?

I think this RMP is too long and complicated to really comment on wisely in the time frame we had.

pg 433 - There are currently 250 allotments or 59% of the planning area that have not been assessed, so I'm not sure BLM knows the true range conditions.

Agriculture has to feed the world and we will need an increase in beef production in the future so we don't have a food crisis. Fremont County can help in the future if BLM doesn't keep reducing AUM's WWP doesn't contribute one thin dime to the Fremont City economy where farmers, ranchers, hunters, and recreation, do.

I'm not sure what CGMS entails but it sounds like restrictions on projects that could help the permittees improve the range. I believe that before the CGMS is developed all the permittees, Wyoming State Lands and the county commissioners need to be consulted.

Thank you for the extended time period
Armstrong Ranch Inc.

