

January 19, 2012

Bureau of Land Management  
 Attn: RMP Project Manager  
 1335 Main Street  
 Lander, WY 82520



RMP Project Manager,

This letter is to comment on the Resource Management Plan that was submitted for the Lander Field Office.

The document was so huge, cumbersome and burdensome that we, along with many others, did not read the entire document. These are our comments based on the information we were able to take out of the RMP. I am sure there are many more issues that we should be addressing, but it was physically impossible to read the entire document and continue to live our lives and make a living. Even if we had read the entire document it would be difficult for the average member of the public to absorb and understand the implications these monumental changes would have on our lives. With that said, these are our comments:

**1). Regarding the social and economic contributions of ranches to our communities:**

It is important that the BLM works towards the economic health of the local ranchers. Our family ranches in Lyons Valley, near Lander, Wyoming, as we have for the past 20 years, grazing our cattle on the Government Draw Allotment. Our ranch is a family business, encompassing three generations, and like most working ranches, contributes to our local economy on many levels. Directly, we provide four full time jobs and at least eight part time and seasonal jobs throughout the year. I do not agree with the RMP's findings regarding the local ranching financial contribution to our local economy. Within a five mile radius in Lyons Valley alone, ranches, dependent on federal grazing permits, support 14 families, along with various employees.

These viable cattle operations in Lyons Valley alone generate between \$2,500,000 and \$3,000,000 dollars in revenue per year. Due to the high input costs involved in the business of ranching, the majority of this revenue is spent on input costs in local businesses in Fremont County in the Lander Resource Area. The number of jobs these ranches indirectly support in Fremont county is substantial. According to the Secretary of Agriculture, Tom Vilsack, "one out of every 12 jobs in the United States is directly related to agriculture". Examples of local businesses ranchers support are (8) financial Institutions; all businesses in repairs, maintenance and parts; equipment and vehicle dealerships; livestock and veterinary services; ranch supply stores; trucking and freight companies; fuel distributors; fertilizer companies; legal and accounting businesses; Riverton Livestock Auction; Fremont County hay and grain

producers; along with food and clothing retailers; healthcare providers and government agencies, such as the BLM. The list could go on and on. If you use the numbers in this paragraph to represent the balance of the 162 permittees in the Lander RMP and the approximately 200,000 AUM's, the amount of money flowing yearly into the Fremont County economy is closer to \$80,000,000. Ranching is not just a "job" (as categorized by the BLM) it is a full fledged business.

Like our own ranch, these ranches not only sustain families, create outside jobs, and contribute directly to the local economies, they also provide life sustaining habitat for wildlife through all seasons of the year. Countless wildlife such as sage grouse, pheasants, deer, antelope and elk, as well as numerous other species, all benefit from the open, managed lands of these ranches. The management of our ranch for cattle is also incredibly beneficial to wildlife. Wildlife benefit from our crop lands, irrigation, water development and managed grazing practices. Because of our working cattle ranches, the public benefits from our open spaces and view sheds. Our Government Draw grazing allotment, deeded and state lands, are so intertwined, it would be impossible for us to continue ranching if even one of these important components were no longer available.

The economic viability of ranches should be at the forefront of the BLM RMP decision making process. Decreasing the permittees' ability to make range improvements (including water development and fences); decreasing AUM's available to ranches; and increasing rules and regulations all work to erode and destroy the economic viability of these ranches, thereby, reducing the benefits that prospering ranches offer to our communities and the public.

**2). Regarding the age of ranchers (page 4 DRMP):**

It is not necessary for the Lander RMP to even address the age of ranchers. On our family ranch, our college educated, married daughter with three children, has returned to run our family business when my husband and myself feel it is time to retire. We also have a school age son who intends to continue to work in the family ranching business when he is of age. Although my husband and I still have the controlling interest in this ranch, we have done the necessary paperwork to begin the process for the younger generation to take over our ranch. It is not unreasonable for us to imagine that our grandchildren will be the next link in our generational ownership. In Lyons Valley, where we ranch, every working ranch has upcoming generations who are involved in the ranch and working to transition from an older generation to a younger generation.

To encourage my young son and grandchildren to continue ranching, and thus, continue to help feed the world, the BLM should consider reducing the rules and regulations on grazing; instead of increasing the regulations and decreasing the AUMs available for grazing over the next two decades. Asking my children and grandchildren to ranch in an environment of increased rules and regulations; decreased tools for effective management; and decreased AUMs puts their business in a state of decline. As these proposals constrict the effective management of the ranch, these children will be more inclined to look towards profitable options for the ranch, including subdividing and fragmentation of the landscape.

Reducing AUM's is equal to asking every rancher to take an across the board pay cut. That pay cut may



be all it takes to take the profitability out of their ranching operation. Is the purpose of this RMP to put ranchers out of business, rather than provide a stable future for the next generation?

According to the BLM's RMP "only 2% of Fremont County is involved in agriculture". According to Secretary of Agriculture, Tom Vilsack, "only 1% of the United States is in agriculture". If 2% of Fremont County is involved in agriculture our county is double the national average! It is amazing that 1% of the population feeds 100% of the population in the United States and still manages to export \$32 billion worth of agricultural products. Viable agriculture businesses keep food costs low. In the United States, food cost comprises only 7-10% of the American workers paycheck. Beef is an important part of this equation. The BLM through this RMP has failed to recognize and take into consideration the importance that BLM grazing plays in contributing to the food chain and the low cost and ample supply of food in this country. Additional rules and regulations from Federal Agencies only contribute to higher food costs. We need more certainty in our business, not more rules and regulations!

### **3). Regarding Lands identified for disposal:**

There are lands which have been identified for disposal on both Maps 94 and 95 of Appendix B that are of critical interest to our ranch. These 160 acres of BLM lands 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.

These 160 acres are important to our ranch for several reasons. First, they are fenced into our ranch and are used by our family to graze our cattle – they have been fenced into the ranch for many decades. The topography on the identified land is mostly ridges and steep hillsides with rangeland vegetation. There is no water on the identified land. Second, in addition to using the land in our livestock management program, but we also use it in our management for wildlife and open spaces. If the lands are acquired by a third party, an additional fence of at least 1.25 miles in length would have to be added to the landscape to contain our cattle or prevent outside livestock from entering our property. Finally, 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.

If the identified BLM lands are to be disposed, we would be the logical choice to purchase 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 extensively for recreation by the public.

### **4). Regarding Recreation and Public Purposes Act Lease – Government Draw Coal Mine Draw**

It is inconceivable to us that the local, state and federal governments can throw literally millions of dollars into the preservation and conservation of the Sage Grouse and our local BLM office is proposing to take approximately 1300 acres of core sage grouse habitat and turn it into a concentrated recreation



free for all. Is this a tactic by the local BLM to limit the recreational use of the balance of the land managed by the Lander Field Office covered under this RMP?

We can not come up with one good reason why the RMP would want to include a concentrated, intensive, recreation area that would pose health and safety concerns for the public and neighboring land owners. We feel that private landowners in the area will endure additional noise pollution due to more intensive shooting and off road vehicle use, thereby potentially having a negative impact on their land values. Not only will the neighbors be impacted, but it becomes a public safety and health concern when it is proposed to combine intensive OHV and intensive shooting in the same concentrated area.

This proposal will also be detrimental to the permittees of the Government Draw allotment because it would be another reason for the BLM to reduce the number of cattle the permittees are allowed to graze in this allotment. Fremont County consists of only 15% deeded ground, therefore leaving recreationalists plenty of land in Fremont County (the second largest county in the United States) in which to recreate. There is no reason to try to concentrate all of their activity on 1300 acres.

**5). Regarding any Proposed ACEC's (page 465, DRMP, Table 3.61.):**

There is no reason to impose additional ACEC's for the purpose of protecting sage grouse. The State of Wyoming has already taken the steps to create rules which are intended to benefit sage grouse and sage grouse habitat. The BLM needs to take into consideration that although there have been cattle and range improvements on these allotments for well over 100 years we still have more sage grouse than any other place in America. This reflects that cattle, range improvements and sage grouse can all live in harmony together without imposing an ACEC.

These are our comments pertaining to the Lander RMP. We hope that as the planning process moves forward you will give serious consideration to these comments, namely the negative impact your current plan will have on ranching and the positive impact that ranching has on our community, state and country both economically and socially.

Please feel free to contact us if you have any questions.

Sincerely,

*Steve A. Pokorny and Susan Pokorny*

Steve and Susan Pokorny

307-332-2227



