



1/16/2012

Lander Field Office RMP/EIS
BLM Lander Field Office
P.O. Box 589
Lander, Wyoming 82520

First off, let me describe to you why we are commenting on your RMP, and who we are. We hold 14 of your grazing permits, totaling 168,447 public acres, a total of almost 15,000 AUM's, within your Lander Field Office RMP Planning area. Our private and public acres surround several of the special designated areas listed specifically in your RMP proposal. Those sites include but are not limited to, Sweetwater Rocks, several NHT sites, Split Rock, sage grouse core, and Green Mountain areas. We are a Wyoming entity called Schiff of Wyoming LLC. In 1945, our grandfather founded Schiff Farms Inc. Our operation has expanded from a small poultry farm into a vast diversified company within the agricultural industry. We encompass over 15,000 acres in row crop production, and have a 52,000 acre ranch in Nebraska. It focuses on a commercial cow herd breeding program and the raising of stocker calves. Not to mention our properties in California, that produces grapes for wine, our grain elevators, and feedlots. Our ranch in Wyoming is over 200,000 acres of BLM, State, and private, with 640 acres of Alfalfa. Our interest in expanding in Wyoming is significant.

We employ two families, plus several area people, for seasonal day help. Economically we purchase and are clienteles of a huge amount of businesses, within your RMP planning area. On an annual basis, we are looking at about \$1 million to be spent locally. Our management has worked very closely, with your agency to improve our allotments from past mismanagement and is on an upswing trend. Which, we are very proud of. Our comments on your Draft RMP for the Lander Field Office Planning Area are as follows.

Our first comment relates to obtaining a hard copy of Draft from your office. It is our understanding that the BLM issued a decision to offer this Draft to the public in a computerized form, instead of a hard copy. It is also our understanding that your decision limited the distribution of hard copies, favoring the computer form instead. We disagree with this decision and strongly suggest offering it in a hard copy form. This Draft is much too large to review within the time allowed for comment, even with the extension of time provided

to comment. It took you a large amount of time to come up with this draft and the public should be allowed a reasonable time frame as well.

In volume 1, page lii, you are quoted as saying "While minority and low-income populations exist in the planning area, no particular BLM actions proposed under any of the alternatives would result in disproportionate adverse impacts to these populations." By your own wording on page 4, you state that "Changing demographics such as an aging population in the livestock grazing industry and a continuation of the shift from labor income to non-labor income such as retirement and investments may have changed the demand." So our understanding is that your draft is putting the agricultural society in the minority and low-income demographics. We strongly disagree, with this comment. We ask that we be removed from that line of thinking in this Draft. Our industry is not aging as you claim, and have not been able to see statistic proof of your claims. Our average age in this company is 30. And we have been able to find many instances in your proposed Draft that directly limits the livestock grazing industry and has posed them as a threat.

We agree with the WSGB that "proposed changes to existing Preference levels of AUM's must be based on long term, science supported trend data monitoring that concludes with a high level of certainty that the original Adjunction of that level of Preference to the base property owned or controlled by the permittee was incorrect. Such a proposed Decision must also provide irrefutable proof that those original Preference AUM's can never be made available in the future for livestock grazing on a sustained yield basis. In addition, any changes must be proposed to be accomplished in the Rules and Regulations that govern the legal process of Adjunction of grazing Preferences to these base properties."

On page 25, second paragraph, you state that AUM reductions are the way for resolving "problems and conflicts". It is our opinion and the Range Science Community, that reductions in AUM's contribute very little to improving land conditions. We feel that it is the entire management plan that has the most effect on meeting resource objectives. We could find no published literature, to support that AUM reductions had any positive effect on achieving BLM's Rangeland Health Standards. Also on page 25, fourth paragraph, it is stated, "range project infrastructure sometimes fragments wildlife habitat and adversely affect recreational values." It should also state that, range project infrastructures also contribute to other resources. By controlling livestock grazing, maintaining wildlife habitat, and for preserving a social and cultural



demographic. A comprehensive grazing management strategy that includes serious consideration of ALL tools available to rangeland managers is the ONLY strategy, which can resolve documented resource concerns. The third paragraph on page 24, clearly contains a bias against legitimate multiple use of BLM lands. The price, of the full use of range tools, does come at a price, but not the price that is conveyed in this paragraph. It should be stricken from the Final RMP. In Alternative D, page 107, it says that water development to only those that will improve sage grouse habitat, is NOT a multiple use management tool. We support the protection and enhancement of all resource values, but FIRMLY believe that this goal cannot be met by a bias in the RMP that is consistently negative against the grazing permittees. We want a RMP that proposes to enhance the viability of grazing WITH the other multiple uses on the same land.

Page 24, fourth paragraph, shows extreme bias against the livestock industry. "The BLM estimates that only 131,449 AUM's are sustainable over the long term if new projects that adversely affect other resources are excluded." Does this mean that the BLM is not able to apply mitigation to insure compatibility? This reduced level of AUM's is a 35% across the board cut. This would only accommodate an unfounded bias against the livestock grazing industry and viability of local ranching families

On page 31, we ask the question about "comprehensive grazing strategy" (CGS) and how it relates to range improvements and their authorization. We do not know what a CGS contains or even looks like. Our company feels that this RMP should recognize the AMP as the preferred procedure to develop a CGS. And that all 10 year permits be recognized.

On page 147 and 1145, the Sweetwater Rocks are accessible by primarily crossing private land. We feel this statement should be considered when talking about hiking, backpacking, climbing, and wildlife viewing. This is not always open to public traffic.

In Table 2.3, page 32, the fourth box shows the number of "Total Surface in The Planning Area" and "BLM Administered Surface" (in acres), that will have "Greater Sage Grouse Nesting Habitat Protective Buffer". We do not feel that this table can impose restrictions on any acres that they do not control. "Total Surface Acres in The Planning Area" should be removed from this table as the BLM has no control or jurisdiction. On page 36 and again on page 107, the Alternatives A, B, C, and D are stating seasonal protective orders for all "suitable" nesting habitats of the sage grouse in the "core area". The core area and the Wyoming Governor's Executive Order do not support the seasonal



restrictions for all "suitable" nesting habitats. ALL Alternatives in this RMP, should be consistent with the Wyoming Governor's Executive Order and should not be allowed to have different criteria spread amongst the different alternatives.

Pages 55, 111, and 378, proposes removal, of existing fences to allow free movement of the wild horse herd. We feel that the final draft of this RMP should have this action excluded. We feel that this is not consistent with a multiple use management plan. Page 758, under the Summary of Impacts, "Impacts from wildlife and wild horses are more localized and site specific than the broad impacts from livestock grazing." Again, the bias against livestock grazing is unfounded. What scientific study standards, to make that statement used? We request that these types of statements be removed as there is not ANY scientific study standards to prove your statement. Opinions and assumptions without data is dangerous ground to tread, and sets grounds for lawsuits. The assumption on page 55, that livestock grazing in Alternative D is the cause of not meeting a standard range objective, when there is no collection of data of other sources. The scenic loop for horse viewing is already in use and do not see a use of adding more. Page 22, 2.4.7, states that it is considered an option to consolidate all seven wild horse herds to the Green Mountain Common Allotment. That consideration is NOT even a remote option in the area. Not only is it not an economically viable option it is not a range management option. The data is not there to support such an option. The economic ramifications are staggering to the livestock grazing permittees currently on the Green Mountain Allotment but also to the neighboring allotments.

Page 484, first paragraph, the entire paragraph is inaccurate and totally bias. Ranching makes a large contribution to the economy in the study area. The culture and history of ranching is the foundation of the study area. The statement "Increasingly, these permits are held by out-of-state owners with no historic ties to the community", is complete bias and holds no basis. The majority of the gas industry is from out- of-state businesses but it is not listed. Being from out-of- state holds zero bases for anything and how does the RMP assume that no historic ties are attached? If we are to assume historic ties are critical, then that assumption needs to be held to all multiple uses including the wild horse program, ATV use, and gas and oil production. They have all changed over the years and many hold NO historical ties. This ENTIRE paragraph is inappropriate and should be stricken from the Final Draft.



On page 1461-1466, discusses the Livestock Grazing Allotments and Range Improvements. The existing RMP Category and the Proposed New Category relate how? How are these categories defined? Why is it not listed what area within the allotment failed? How can they change already without studies and data? The wording should be changed to say that range improvements could be used, to help correct the specific reason why a portion of an allotment failed the Standards. We comment that grazing management should be based on rangeland monitoring, which must be more than just stubble-height and utilization. Especially when management plans are in use. How are the categories not expected to improve? Thought that was the idea of a management plan?

Page 1471-1475, Table K.5. Summary of Range Improvements 1986-2009. It is staggering how inadequate the range improvements are in correlation to the amount of years. This could be directly tied to some grazing issues not being resolved. This also hugely affects wildlife habitat, streams, and overall range health. This table shows a direct relation to management NOT using tools available to make a sustainable viable multiple use area!

Page 1486, Tables L.9 and L.10, we believe these assumptions are not correct. Prior to the Final Draft we propose that the most current and accurate information be used on this subject. We want an RMP that enhances the sustainability and viability of the local ranching industry as it does to the other multiple uses. We would like to help make the study area a viable multi use area. Not one that is constantly bias to one industry over another. Page 223, Alternative D, Impacts on Quality of Life and Local Culture”, is way off base with stating that the impacts would be “Moderate Potential”. The impact of an AUM reduction, of what you are proposing will have “Red Flag Debilitating Potential” to the quality of life and local culture within the study area. Statements such as this in the RMP along with all the others throughout the RMP, conveys a negative attitude on the use of all tools available to rangeland and livestock grazing permittees. The negative attitude throughout the RMP is that the livestock industry will be less important to the culture and quality of life within the RMP area.

It has taken several generations of success and hard work to have the ability to purchase and stock a ranch such as the historic Split Rock Ranch. This in itself speaks volumes of our passion. We came to Wyoming, in search of a ranch, because it is one of the few states that provide the resources that are required to be able to support the product that hits most every family table,



BEEF. The Split Rock Ranch with its allotments allows us to economically function in a self-sustaining manner. If the AUM's are reduced, the negative impact on the land and people associated with it will be catastrophic. The things that will go first will be the esthetic things and that is what most of the general public will see and secondly the money spent locally on services and goods, related to our operation will be non-existent.

As the managers of the Split Rock Ranch we, Travis and Jennifer Stevenson, have a few comments to add. We are a YOUNG family that have been on the Split Rock Ranch for eight years and have EVERYTHING vested into it! We have seen huge improvements in all areas of the ranch, under our tenure. We ask that you seriously consider these comments and re-consider harming our way of life! Our children will be the next generation, after us, to continue our way of life, and we ask you to leave their heritage intact in the livestock industry.

We ask that you consider our comments while finalizing a Final Draft.

Respectively,

**T.J. Schiff
Owner/Operator
Schiff of Wyoming, LLC. /Split Rock Ranch**

**Travis and Jennifer Stevenson
Manager
Schiff of Wyoming, LLC. /Split Rock Ranch**

