



WYOMING WOOL GROWERS ASSOCIATION

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March 27, 2014

Lisa Solberg Schwab
Bureau of Land Management
Pinedale Field Office
P.O. Box 768 1625
West Pine Street
Pinedale, Wyoming 82941

Dear Ms. Schwab:

The Wyoming Wool Growers Association (WWGA) appreciates the opportunity to comment on the proposed Greater Sage Grouse Draft Land Use Plan Amendments and Draft Environmental Impact Statement for Wyoming. The WWGA serves to protect, preserve, promote and enhance the interests of sheep producers and other livestock owners in Wyoming. A top priority is to ensure the interests of private landowners, including those who hold BLM and Forest Service grazing permits. Incorporated into this priority is the goal to enhance and ensure Wyoming's natural resources. The Wyoming Wool Growers Association was formed with these goals in mind in 1905, the same year the US Forest Service (FS) came into existence and long before the Taylor Grazing Act and the eventual creation the Bureau of Land Management (BLM). So our interest in these issues is longstanding.

Like many others, we have reviewed the draft EIS and land use plan amendments. The concerns outlined in the following comments address primarily the prescribed treatment of livestock grazing management and permit renewals, the role of the Governor's Executive Orders (EO-2011-05 and EO-2013-3) and the often confusing and ambiguous language used throughout the extensive document. We mention a few other areas of specific concern as well. Although we limit our comments here to these concerns for the purposes of brevity, we associate ourselves with and endorse the well documented concerns described in comments submitted by others, including the Governor's office, the Wyoming Stock Growers Association (WSGA) and Cole Creek Sheep Company.

Livestock Grazing Management and Permit Renewals; Use of Livestock Trails: We are dismayed that livestock grazing is listed as a threat when it is well established that proper livestock grazing management is not a threat to sage grouse or its habitats. All livestock grazing across the state does not need to be indicted if a situation occurs where improperly managed livestock grazing appears to have a negative impact. We would suggest that it would be more accurate to indicate that *improper* livestock grazing management *may* pose a risk and indicate that if such situations develop, they will be addressed as they occur. We concur with the WSGA in their comments supporting voluntary cooperative grazing management strategies (Action Number 45). We further agree with their concern that too often such cooperative grazing management strategies are driven by the federal agency management demands rather than as a method for determining economically sustainable strategies for the permittee/lessee.

We are concerned about, and object to, the language regarding permit renewals and the use of "Annual Operating Instructions" (AOI) and as a tool in assessing or evaluating range land health. AOIs are cooperatively agreed to each year as a strategy for an operation's grazing management and are not used to determine whether range land health standards are met. We strongly object to the use of AOIs in this capacity. Furthermore, under newly adopted FS regulations, AOIs are no longer appealable by the permittee. We urgently request that this language be removed from the document.

The decision to incorporate provisions of the National Technical Team (NTT) report is also alarming to us. The NTT report was not available for public comment or participation, and it did not receive independent scientific peer review. Furthermore the NTT report never analyzed the issue of whether existing regulatory mechanisms governing livestock grazing and range management were adequate to protect sage-grouse prior to developing alternatives. Therefore we find the report to be lacking credibility and it should not be used.

Livestock Trailing: The discussion of livestock trailing is a major concern to the WWGA. The use of livestock trails is essential to sheep producers. Many of the livestock trails in use today have been in existence since before either the Taylor Grazing Act or the creation of BLM, - in some cases even before the creation of the WWGA. Any changes in their use could be economically detrimental to Wyoming's sheep industry. Closure of or limited use of livestock trails should be carefully considered and only implemented in rare circumstances, and only following extensive collaboration with the parties that use the trail. The impact that a closure would have on users must be given priority consideration. This must be incorporated into the plan amendments.

Impact of Predators: It amazes us, and deeply disturbs us, that the Draft EIS fails to recognize the significant and observable impacts that predators have on sage-grouse. Substantial evidence exists that show the damage predators do to Sage Grouse populations yet the language in the document refers only to ambiguous and vague actions like "minimize the threat that predators pose" and "minimize impacts from predators". The Draft EIS shows virtually no support for management of predation species that aggressively target sage-grouse. The idea that predators, which thrive on sage grouse eggs, pose a lesser threat to sage grouse populations than long-standing land use practices, such as livestock grazing, borders on absurd.

Role of Wyoming Governor's Executive Orders EO-2011-05 and EO-2013-03: The State of Wyoming has already implemented a comprehensive sage grouse management plan. While some landowners, including some WWGA members, have been negatively impacted by the Governor's plan, the WWGA would prefer to see the Governor's plan more fully incorporated into the BLM/FS approach. By incorporating the State's existing plan, which is by now familiar to most landowners, there is less likelihood for confusion and distrust. We believe this would help minimize further negative impact on Wyoming landowners.

Wyoming's comprehensive plan has been endorsed by the US Fish and Wildlife Services. The BLM and FS would be better served to use Wyoming's existing plan as the foundation for the federal plan to address Sage Grouse. When discussing the "Preferred Alternative", that is Alternative E, the approach is said to be consistent with existing guidelines but a thorough reading of the full document reveals a lack of real recognition of the State's direction on sage grouse management. This is particularly true with regard to treatment of areas located outside of core sage grouse habitats. Under the Governor's Executive Orders, the management of areas outside core habitat are not managed at the same level as those areas within designated core areas (another reason for the need for defined terms, as mentioned earlier in these comments). Further, in various places throughout the BLM/USFS document, there is only reference to coordination with "state game and fish agencies" but under the Governor's Executive Orders, responsibility for Sage Grouse rehabilitation is placed within all "applicable state agencies", not just Wyoming's Game and Fish Department. We request that the BLM/FS incorporate the State approach in any land use amendment regarding sage grouse.

Confusing and Ambiguous Language: We found the language throughout the document to be confusing, and its presentation fragmented. It is difficult to determine if it inadequately reflects or incorporates current and existing management practices. Part of this may be due to the fact that many of the document's components are used in proposals for other states and not just for the state of Wyoming. The lack of clear definitions or descriptions of several important terms is an example. It is stated in Chapter Two that the terms "core habitat" and 'priority habitat' are considered to have the same meaning and are interchangeable throughout the document. There is no

other definition included for these terms. We argue that they do not have the same meaning and therefore need to be defined. Furthermore, the term “core area” is not defined, though the various ways in which states currently use the term is included. We recommend that the established and well accepted definitions that have been used by Wyoming in its Sage Grouse Management plan (as defined in the EOs) be incorporated into BLM and USFS plan for Wyoming.

The document also does not clearly differentiate public and private land areas. The terminology is alarming, particularly in Action Number 40 where it reads “BLM/USFS would retain public ownership of core habitat”, with only narrow exceptions defined in Alternative E. This is very concerning to us. Notwithstanding the unrecognized fact that protection and enhancement of sage-grouse habitat is often accomplished on private lands (and sometimes more effectively than on federal lands), the statement implies an increase in federal land ownership under the guise of sage grouse protection. The WWGA stands in strong opposition to increased acquisition of lands by the federal agencies. Further, we strongly oppose any acquisition of lands by federal agencies that is not based on clear multiple use benefits, including livestock grazing. We cannot lend our support to any alternative that does not acknowledge and respect private land ownership.

Conclusion: As indicated in both our comments and the comments that we associate ourselves with, (i.e., those of the Wyoming Governor’s office, Wyoming Stock Growers Association and Cole Creek Sheep Company), several changes are necessary to make any of the alternatives acceptable. Notwithstanding Alternative A (No Action), the only alternative that could begin to be an acceptable choice for the WWGA is Alternative D, which at least attempts to incorporate the current state management plan, but contains other problematic provisions. We encourage greater coordination with the widely accepted Sage Grouse Management Plan already being implemented in Wyoming. This greater coordination needs to also involve permittees/lessees and local governments. Doing this would place the preferred alternative of BLM and USFS (Alternative E) in a more compatible position with current and established multiple use of Wyoming’s public lands. Safeguards must be included to ensure effective input from these entities so that federal agency input is not the only driving factor behind management decisions. Further, more recognition and incorporation of traditional public land use as part of Wyoming’s culture and lifestyle is needed. In our case, livestock production, particularly sheep production, has been an integral part of Wyoming’s socioeconomic culture since before the state was formed. We have cohabitated with wildlife to the benefit of both for over a hundred years. This must be considered and respected in any approach to wildlife and range land management in Wyoming.

We appreciate the opportunity to express our thoughts on the 9 plan. If you have questions or need further input, please don’t hesitate to contact us.

Sincerely



Amy W. Hendrickson
Executive Director

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