

Moffat County Farm Bureau
Jackie Osburn President

469 Yampa Ave.
Craig Co. 81625

January 30, 2005

Bureau of Land Management
Little Snake Field Office
Attn. Jeremy Casterson
455 Emerson St.
Craig Co. 81625

Dear Jeremy Casterson

On behalf of our members and our associations we wish to provide the following comments on the revision of the Little Snake Resource Management plan (LSRMP).

Multiple Use

We support the multiple use of public lands which includes Livestock grazing. Grazing has been one of the longest sustained uses of public land in the Little Snake Resource Area predating the BLM. Grazing is an important component of this area's custom, culture and economic diversity. Grazing on public lands is intricately tied to the maintenance of private land open space. We support the responsible use by other industries and recreational users so long as they are held to the same standards for public land health and responsible for their impacts as the grazing users are.

Livestock Grazing

The Taylor Grazing Act requires the BLM to manage public lands to provide for the sustainability and the viability of the livestock industry and their associated communities. The Public Range Lands Management Act (PRIA) and Multiple Use and Sustained Yield Act (MUSYA) also direct the BLM to manage rangelands for the benefit of the industry through sustained yield. We request that all lands historically used for grazing remain open for grazing and that the BLM RMP retain the full historic livestock grazing preference AUMS. We request that the BLM implement a plan to manage the desired plant community and the desired future condition of the range lands to support the historic grazing preference of allotments and enhance the viability of our industry.

Special land designations

We are opposed to any special designation of lands that would adversely impact permittees or private property. We are opposed to any designation of BLM lands that would impair, or restrict the ability of Permittee to create new range improvements or adopt new technologies that would sustain and enhance the range resource or the permittee's AUMS (ACEC, Wilderness, Wild and Scenic, SRMA etc.). Any special designation of lands must specifically provide for the full continuation of grazing and the supporting infrastructure development needed to sustain grazing (new and existing) for the life of the designation. All special designations must honor valid existing rights and recognize any impacts that they have on the designation

Wild horses

We are opposed to any expansion of wild horse herds or herd areas. Future management of horse herds must react to drought in the same manner that is required of grazing permittees.

Wildlife

Wild life populations must be set based on the ranges carrying capacity and the recognition of other uses, especially livestock grazing. The BLM must not reallocate livestock AUMS to wildlife or other special status species. If additional capacity is desired then a desired plant community plan should be developed to provide for both the wildlife and livestock grazing needs.

Valid existing rights

We support the recognition by BLM that valid existing rights exist on public lands within the LSRA some of which predate the creation of the BLM. These include but are not limited to: Public rights of ways, Water rights including ditch and reservoir, the prior right of use by grazing permittees (Preference), Specific rights associated with the BLM leases or permits and Utility corridors.

Outcome based management

We encourage the BLM to reject the prescriptive form of management and adopt a RMP based on desired outcomes. The RMP should allow the flexibility and the use of adaptive management to achieve those outcomes. This will lessen the regulatory burden place on permittees and encourage innovation as well as cooperation.

Net effects

BLM lands are intricately linked with the private lands and the social and economic aspects of our communities. An example of this relationship is when private lands are retained in open space, which benefits wild life and are in many permittee's cases, directly attributable to continued access to grazing on public lands. Therefore the concept of net effects needs to be taken into account when analyzing decisions.

Local plans

We support the BLM in being consistent with local plans. Specifically, Moffat County's Land Use plan, Right to Farm Ordinance, Weed management plan and Fire plan.

Socio Economics

The BLM is required by NEPA to assess the socio and economic impacts of all alternatives and proposed decisions. We request that the BLM fully and completely address the range of impacts proposed decisions would have on Moffat County and our industry's economy. We also support the development of an ongoing economic model that will allow decision makers to understand their role in maintaining the viability of our industry and local economy

Land Boundary adjustments

Where there are agricultural trespass situations we support the BLM selling or exchanging those lands with the effected land owners.

Respectfully Submitted

**Sharon Andrew
Secretary, Moffat County Farm Bureau**