Wyoming
Department of Agriculture

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April 20, 2006

U.S. Forest Service
Big Piney Ranger District
Mr. Greg Clark
Fisherman Creek Aspen Treatment
P.O. Box 218
Big Piney, WY 83113

To Mr. Clark:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the proposed Fisherman Creek Aspen Treatment project.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the treatment of aspen stands has major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, it is important that the WDA remain involved in all actions and decisions affecting the agriculture industry and that we have the opportunity to express pertinent issues and concerns.

Continued decline in the condition and acreage of aspen stands and the encroachment of conifers and sagebrush into these communities will increasingly have adverse effects on livestock grazing. We support efforts to restore the vegetative and age-class diversity of a fire-adapted ecosystem to aspen and sagebrush stands in Wyoming.

The WDA supports the mechanical and commercial removal of conifers from aspen stands to improve ecological conditions and restore the health and function of aspen stands. We support the jackstrawing of decadent aspen to promote aspen suckering and regeneration. However, in the event that fencing of regenerated aspen stands may cause (1) a significant reduction in available forage for livestock; (2) the removal of available water for livestock; and for (3) an increase in fence maintenance costs for the permittee, the WDA is not in support of the Fisherman Creek Aspen Treatment project. We strongly encourage the Big Piney Ranger District, U.S. Forest Service (FS), to address the following issues raised by the WDA.

Livestock Exclusion Fencing and AUM Reduction

If fencing is proposed, surrounding areas of jackstrawed decadent aspen, the WDA is concerned the cost and labor for fence maintenance will fall on the livestock permittee. Livestock permittees want to maintain fences on their allotment to ensure a sustainable grazing pattern. This maintenance is currently a cost to their livestock business, and additional costs are not welcome.

Using fencing to protect aspen regeneration removes available water for livestock, thus altering the grazing pattern in many allotments. Removing available water for livestock can

create an undesired grazing impact within the allotment. We recommend the FS explore the development of alternative water sources in allotments where aspen stand fencing is utilized.

Ultimately, fencing aspen stands lowers the available forage in a livestock allotment. Are the AUMs per allotment going to be reduced? Are the livestock permittees responsible for any resource damage that occurs within an allotment, which may be caused by other ungulates?

Cooperation with Livestock Permittees

We ask the FS to continue working with all livestock grazing permittees who may potentially be adversely affected by these projects. We suggest conversations and inclusion in the project remain forefront to ensure the recovery of the treatment area, while not negatively impacting the economic viability of the grazing permittee. On-the-ground cooperation with the grazing permittee to identify smaller project areas and share resource knowledge will contribute to the success of aspen regeneration. We request the duration of time needed after treatment be evaluated on a case by case basis in cooperation with the grazing permittees, rather than adhering to a predetermined nationwide policy.

Multidisciplinary Site-specific Review Team

If proposed, the WDA is interested in inclusion within the multidisciplinary site-specific review team to evaluate the treatment needs of aspen communities. When post-treatment management includes livestock exclusion, it is important to keep livestock grazing in mind when selecting aspen stand regeneration projects. We offer our expertise and services to your disposal. Please continue to include the WDA as an interested party in this analysis. Send all future information to:

Wyoming Department of Agriculture
Natural Resource Section
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Economic Impact to Agriculture

The inventory value of livestock in Sublette County alone exceeds $35,580,000 per year (NASS-USDA, 2003). Any negative impact or alteration to the livestock industry can lead to a significant decrease to the value of agriculture. An important aspect of ranching in the Rocky Mountain area is that summer grazing on public lands has no viable substitute during that season. Therefore reducing public lands grazing makes other forage sources less available because of conflicting seasonal uses. Private meadows are hayed for winter feed and cannot be used as a summer grazing alternative (Taylor, Coupal, Foulke and Thompson, 2004).

Wyoming ranchers and their private ranch land rely on federal grazing for social and economic productivity. The ability for ranchers to graze federal lands is critical for their operation to remain economically viable. The loss of ranchlands is a very crucial issue, as

the impacts of subdividing private ranch land in the surrounding area will have an extreme-demonstrative effect on the wildlife populations, their prey base, and available open space and habitat. This subdivision of private ranchland is far worse on the ecosystem, especially when compared to the minuscule utilization of forage by livestock in an allotment. If grazing permits are permanently removed, the FS can count on the eventual removal of habitat on the private ranchland.

Agricultural land is being converted into rural residences at an unprecedented rate in the Inter-mountain West. Survey data have been collected for Sublette County, Wyoming concerning preferences for private land use and land use controls (McLeod, Woirhaye, Kruse and Menkhaus, 1998).

Because agriculture is the dominant private land use in Wyoming, the future of open spaces on such land in the state will depend to a large extent on what happens to agriculture. A number of factors adversely affect the retention of agricultural land in Wyoming. One factor is the continued uncertainty about livestock grazing on federal lands (Taylor, 2003).

Sublette County, Wyoming policy encourages conservation of agricultural and ranch lands and related land uses through various voluntary and incentive-based programs and policies (Sublette County Comprehensive Plan, 2003).

As an impact from alternative uses and ecological improvements on federal land is imminent, ensure that the efforts of the FS will not have a significant adverse financial impact on ranching, and, therefore a potentially devastating impact on wildlife and the natural resource base.

Thank you for the opportunity to comment.

Sincerely,

John Etchepare

JE/mh

CC: Governor's Planning Office
Wyoming Farm Bureau Federation
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Game and Fish Department
Wyoming Board of Agriculture