



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

January 26, 2016

Medicine Bow-Routt National Forest
Brush Creek/Hayden Ranger District
Attn: Melanie Fullman
PO Box 249
Saratoga, WY 82331

Dear Ms. Fullman,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the North Savery Project (Project) on the Medicine Bow-Routt National Forest (MBNF) regarding 6,500 acres of salvage logging, pre-commercial thinning, and hazard tree clearing and decommissioning of 26 miles of roads in the Sierra Madre mountain range.

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 this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA appreciate the MBNF's proactive approach to capitalize on salvaging timber affected by insect and disease, which not only benefits the forest, but also the local economy, wildlife, and livestock. We offer the following comments to include in the future Environmental Analysis (EA).

The WDA encourages the MBNF staff to coordinate with livestock permittees prior to any treatments. Permittees contain irreplaceable, long-term, on-the-ground knowledge of natural resources and how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project areas and can offer recommendations which are both environmentally and economically sound. MBNF staff should openly communicate and utilize adaptive management practices throughout the project area.

We also encourage MBNF work closely with grazing permittees on their proposals regarding roads and fence reconstruction. The grazing permittees have an intimate knowledge of their grazing allotments, including current fence lines and conditions, as well as what roads are vital for their operations. Specifically, WDA discourages the reconstruction of Forest Service road 435, which would direct traffic onto a lower standard Bureau of Land Management road.

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Currently, many of the designated roads lead to illegally developed roads and trails by All Terrain Vehicles (ATV), causing resource damages and impacting water quality. We urge MBNF ensure the EA recognizes and addresses the illegal uses of ATVs in the Savery Project area. In addition, the EA must consider the potential for increased ATV use based on the Proposed Action and analyze the impacts to all resources.

The Proposed Action proposes to decommission 26 miles of roads to alleviate resource concerns and avoid duplications. WDA supports the Proposed Action, but also insists MBNF provides adequate law enforcement to alleviate on-going use of these decommissioned roads. WDA would advise reclamation plans are developed and implemented as part of the decommissioning. Natural revegetation will likely take too long and may convey to the public the road remains open.

Management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on federally administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing, needs to be specifically noted in the environmental document. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Many in the public are unaware of this Congressional policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The MBNF officials need to include impacts on this economic activity in the EA. We urge MBNF officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of Agriculture, who conducted several studies showing how federal policies impact agriculture and local economies throughout the state. The studies include the importance of Animal Unit Months, the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EA must include (1) the positive effects livestock grazing has upon the environment, and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Forest Management Plan.

Livestock grazing is an approved activity in the Revised Forest Management Plan. Reductions, limitations or actions prohibiting livestock grazing in the Project Area are considered an adverse impact. Decisions made in the Proposed Action should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions, based on long-term

monitoring data and not based on single incidents, isolated situations, and pressure by special interest groups or political whims.

We strongly support the continuance of commercial livestock grazing at the approved AUM level within the Savery Project area and appreciate the opportunity to comment on the scope of the Proposed Action. WDA requests interested party status following the Proposed Decision throughout the Objection Process. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
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