



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

January 27, 2020

BLM Pinedale Field Office
Attn: Liz Dailey
Project Lead
PO Box 768
Pinedale, WY 82941

Dear Ms. Dailey,

Following are the Wyoming Department of Agriculture (WDA) scoping comments on an Environmental Assessment (EA) to address invasive vegetation management within the Bureau of Land Management, Kemmerer Field Office (BLM) Pinedale Field Office (PFO) boundary.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The WDA is a strong proponent of analyzing landscape scale treatment areas to proactively address resource conditions, especially invasive vegetation management, using biological, chemical, and mechanical control options. Invasive vegetation crosses federal, state, and private lands. We support the BLM collaborating with other federal, state, and private landowners by developing a comprehensive plan to assist in prioritizing resources and addressing invasive vegetation. In addition, BLM should utilize a full array of tools and methods at the same time to help eradicate or control invasive vegetation. Programs such as Good Neighbor Authority and Shared Stewardship are existing tools to consider for this project.

We urge the BLM to consider utilizing targeted livestock grazing as a biological tool to combat invasive vegetation. This will require consideration and temporary modification of grazing permits for season-of-use and livestock type to address different invasive species. Examples could include, utilizing goats to address leafy spurge or cattle grazing cheat grass in early spring.

We suggest BLM develops objectives for each site and include maps and pre and post monitoring of all targeted areas. Prioritization of targeted areas should either be in a downward trend or not meeting standards and guidelines. We recommend incorporating Ecological Site Descriptions and reference sites as part of the monitoring process.

We request BLM ensure a 2 year notification to livestock grazing permittees affected by the treatments. While we are strongly opposed to a mandatory 2 year rest of treated areas, we believe incorporating realistic objectives are important and working closely with the permittees to work towards meeting those objectives.

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Invasive Scoping PFO

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The BLM must include the potential to apply new and innovative chemicals as they become available. The EA should not prohibit chemicals or limit application to only currently available products to alleviate future and costly analysis under the National Environmental Policy Act.

WDA encourages the potential treatments apply to Wilderness Study Areas (WSA) including Lake Mountain and Scab Creek. The designation of WSAs should not prohibit the wide array of treatment options, including aerial spraying for invasive vegetation, while still meeting the original intent of the WSA designations.

In conclusion, we appreciate the opportunity to comment and look forward to working closely with your staff on the development and analysis of this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,

A handwritten signature in blue ink that reads "Doug F. Miyamoto". The signature is fluid and cursive, with a long horizontal line extending from the start of the name.

Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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Wyoming Association of Conservation Districts
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