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

January 4, 2019

Mr. John Shivik, Sage-grouse Coordinator  
United States Forest Service  
Intermountain Region  
Federal Building  
324 25<sup>th</sup> St  
Ogden, UT 84401

Dear Mr. Shivik,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the United States Forest Service (USFS) Environmental Impact Statement (EIS) for proposed changes to the Greater Sage-grouse Land Use Plans in Wyoming.

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.

We applaud the USFS's approach to this amendment and appreciate your continued commitment to working closely with our agency and others. Due to this close work with cooperators, our comments are limited. We support Governor Mead's letter and the comments contained therein. However, we have three additional comments for your consideration:

**1. Table 2-9. Wyoming – Comparison of Alternatives, pg. 2-15, GRS-G-LG-GL-037-Guideline:**

*"In greater sage-grouse habitat, if livestock grazing is determined to be a primary causal factor limiting achievement of desired conditions for seasonal habitats on capable sites, adjust livestock management, as appropriate, to address species life requirements (e.g., cover, food, shelter)."*

**Comment:** Please add a reference to Cagney et al., 2010<sup>1</sup> at the end of this Guideline. We suggest the addition of a sentence that reads: "Refer to Cagney et al., (2010) when considering adjustments to livestock grazing management."

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<sup>1</sup> Cagney, J., Bainter, E., Budd, B., Christiansen, T., Herren, V., Holloran, M., Rashford, B., Smith, M., Williams, J. "Grazing Influence, Objective Development, and Management in Wyoming's Greater Sage-Grouse Habitat with an Emphasis on Nesting and Early Brood Rearing" March, 2010.

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**2. Table 2-9. Wyoming – Comparison of Alternatives, pg. 2-17, GRSG-LG-GL-041-Guideline:**

*"To minimize collision risk associated with fences, existing fences within 1.2 miles of leks should be modified through removal, marking, laydown, or other design features. New fencing within 0.6 miles of a lek would not be constructed March 15 through June 30, or on the lek itself"*

**Comment:** While this Guideline closely aligns with our Executive Order, we feel minor changes could improve consistency. Please revise the language to read:

**"To reduce collision risk in PHMA, existing fences within 0.6 miles of occupied leks should be modified through removal, marking, laydown, or other design features. New fencing within 0.6 miles of an occupied lek would not be constructed March 15 through June 30 or on the lek itself; new stretches of fence with high potential for collisions should be marked."**

**3. Appendix F – Wyoming, pg. F-3, Footnotes.**

**Comment:** The footnotes listed do not appear to match the table. Specifically, Footnote 12 is missing and there are two Footnote 13's. It appears the first Footnote 13 (referring to "...desired conditions for riparian areas/wet meadows...") should actually be Footnote 12. We suggest the USFS check all Footnotes again for accuracy and also ensure there are none missing from the Appendix.

Thank you for the opportunity to comment and we look forward to working closely with you in the future.

Sincerely,



Doug Miyamoto  
Director

DM/jb

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming County Commissioner's Association

Wyoming Game and Fish Department  
Wyoming State Grazing Board  
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