Wyoming
DEPARTMENT OF Agriculture

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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.

October 25, 2017

Mrs. Anne Davy, Project Manager
United States Forest Service
Black Hills National Forest
1019 N. 5th St
Custer, South Dakota 57730

Dear Mrs. Davy,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the United States Forest Service, Black Hills National Forest (FS) Draft Environmental Impact Statement (DEIS) for the Black Hills Resilient Landscapes Project (Project).

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, including Objections under 36 CFR 219.

Although Wyoming does not contain the majority of the Black Hills National Forest and does not appear to be as heavily impacted as the South Dakota side (EIS pg. 1), we provide the following comments for the document as a whole:

- Pg. 71-72: *"Fire suppression, grazing, and intensive forest management have trended the forest outside the historic range of variability, creating uniformly forested landscapes with numerous even-aged stands, many of which are dense or have thick carpets of pine seedlings and saplings (Hunter et al. 2007)"*
    - Comment: Grazing, by either wildlife or livestock, and intensive management would not likely result in the creation of even-aged stands. Please change to read: "Fire suppression, coupled with differences in stand management over time, have trended the forest...."
- Pg. 89: *"Removal of timber may unintentionally increase access for livestock and illegal off-road vehicle use. New use in areas increases not only the potential for unauthorized collecting, trampling, and other losses of individuals but also increase susceptibility to non-native and/or invasive plant species invasion."*

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- Comment: While the above statement is true, there is also the potential for increases in available light to lower levels due to canopy removal and therefore potential for increases in sensitive or rare plants. The FS should include potential positive impacts of treatments. Also see page 94 of the DEIS which states: *"Proposed road construction may allow livestock to access previously ungrazed areas, though this effect would be minimal..."* which seems to imply a limited impact, if any, contrary to the statements on page 89.

➢ Pg. 94: *"Aspen regeneration resulting from proposed activities may need protection from grazing...These activities would be coordinated with the range program managers to ensure that cattle distribution is not unnecessarily affected."*

- Overall, we support this paragraph when deferment from treatment areas is necessary. However, we would ask that activities be coordinated with range program managers and permittees and "protection" be clarified. Please add "and permittees" to the last sentence of this paragraph and add "temporary" before "protection" in the first sentence.

➢ Pg. 119: *"Threats to this species are habitat loss due to logging, grazing, forest fires...Timber harvest and grazing may affect snails by altering the amount of litter, soil moisture, or temperature (Anderson 2005)"*

- Please differentiate between proper and improper grazing. Properly managed grazing should have no impact to Cooper's Rocky Mountain snail habitat.

Overall, we appreciate the brevity of the DEIS and the FS's adherence to the topic at hand. We support the proposed project(s) and believe they will improve conditions on the Black Hills National Forest for multiple uses and user groups. We would appreciate being involved on future projects associated with this analysis that have the potential to impact forage for livestock.
We appreciate the opportunity to comment and look forward to working with you in the future.

Sincerely,

Doug Miyamoto
Director

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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
Wyoming Stock Growers Association
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