



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

March 14, 2016

Mrs. Deb Lozinski
United State Forest Service
Bighorn National Forest
2013 Eastside 2nd St
Sheridan, WY 82801

Dear Mrs. Lozinski:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the Bighorn National Forest's (FS) proposal to thin small diameter conifer trees in previously harvested areas.

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 support the FS's proposal to thin small diameter trees. Scientific literature and existing silvicultural practices show that thinning smaller trees not only allows for growth release in larger, adjacent trees, but may also aid in strengthening remaining trees, improving their ability to fight off infection or infestation from parasites and bark beetles¹ and increase resilience when faced with wildfire.^{2,3} Thinning can also provide for additional understory growth and may increase forage for wildlife and livestock.^{4,5} While we support chipping, lopping and scattering, and mastication, we also believe there is a need to leave some felled trees entirely intact. These intact felled trees can provide habitat⁶ and nutrients over time to the forest floor.⁷ The FS should also consider removal of larger diameter trees (7-12" DBH) that are unhealthy or pose a safety risk.

¹ Mitchell, R.G., Waring, R.H., Pitman, G.B. Thinning Lodgepole Pine Increases Tree Vigor and Resistance to Mountain Pine Beetle. *Forest Science*, Vol. 29, No 1, pp. 204-211. 1983.

² Agee, J.K., Skinner, C.N. Basic principles of forest fuel reduction treatments. *Forest Ecology and Management* 211, pp. 83-96. 2005.

³ Graham, R.T., Harvey, A.E., Jain, T.B., Tonn, J.R. Effects of Thinning and Similar Stand Treatments on Fire Behavior in Western Forests. USDA Forest Service, Pacific Northwest Research Station, General Technical Report PNW-GTR-463. 1999.

⁴ McConnell, B.R., Smith, J.G. Response of Understory Vegetation to Ponderosa Pine Thinning in Eastern Washington. USDA Forest Service, Pacific Northwest Research Station. 1969.

⁵ Moore, M.M., Deiter, D.A. Stand density index as a predictor of forage production in northern Arizona pine forests. *Journal of Range Management*, Vol. 45, No. 3, pp. 267-271. 1992.

⁶ Converse, S.J., Block, W.M., White, G.C. Small mammal population and habitat responses to forest thinning and prescribed fire. *Forest Ecology and Management* 288, pp. 263-273. 2006.

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BHNF Thinning

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In conclusion, we support the proposal and thank you for the opportunity to comment.

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 Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association

⁷ Fahey, T.J. Nutrient Dynamics of Aboveground Detritus in Lodgepole Pine (*Pinus contora ssp. latifolia*) Ecosystems, Southeastern Wyoming. Ecological Monographs, Vol. 52, No. 1, pp. 51-72. 1983.