



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

May 20, 2019

Bridger-Teton National Forest
PO Box 1880, 340 N. Cache St.
Jackson, WY 83001

Dear Ms. O'Connor

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Invasive Plant Management Draft Environmental Impact Statement (DEIS) for the Bridger-Teton National Forest (BTNF).

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 appreciates the BTNF's efforts to progressively identify management options to treat increasing invasive plant species across the entire forest. We support an adaptive management approach by allowing flexible management options to address future invasive species infestations. We offer the following, brief comments to consider for the DEIS and ultimate Final Record of Decision (FROD).

- Page 16: *"The preferred alternative would be implemented over the next 15 years and would treat approximately 5,000 and 15,000 acres annually. Of that, an estimated 5,000 to 10,000 acres could be treated using aerial application of herbicides."*

Page 27 – Table 4: Aerial Application of Herbicide, Alternative 2: "5,000 – 15,000"

Comment: WDA supports as much flexibility as possible, but the DEIS as proposed has conflicting acreages, which may lead to reducing the ability to treat larger areas. We support Table 4 which provides up to 15,00 acres of aerial treatment.

- Page 39: *Livestock can be penned on large cheatgrass infestations for a brief period in early spring when the grass is palatable and nutrition, provided the terrain is gentle enough and adequate water sources are available. The Bridger-Teton NF has few sites where this would be effective."*

Comment: WDA is concerned the BTNF is narrowing the ability to use targeted livestock grazing by a biased opinion of locations where terrain and adequate water is available. In addition, time of year should be considered for potential treatments; fall treatments/grazing are more effective and fit on/off dates more logically on Forest Service lands. Depending on each location, temporary electric fence, temporary stock water, salt and mineral placement, and herding are all management options to include in the DEIS. Additionally, the DEIS is certainly not clear whether or not these management practices

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are included in this analysis and would not require additional National Environmental Policy Act (NEPA) analysis. We would request this clarification is made in the Final EIS and FROD.

- Page 64: "Overgrazing by domestic sheep and goats could affect wildlife with low-mobility such as small mammals..."

Comment: WDA believes the statement is inconsistent with previous direction of allowing targeted grazing by any domestic livestock appropriate for each site. The key is to provide the Forest Service the most flexibility to address invasive plant issues. We would request the DEIS clarify and ensure the change is made throughout the document. See also page 80.

Comment: WDA is concerned the DEIS does not provide direction or certainty to utilize targeted grazing in a flexible manner. As proposed, the DEIS does not clarify how the grazing would occur, including using sheep or goats on a permitted cattle allotment to address weeds such as leafy spurge, or utilizing cattle for cheatgrass removal on a sheep allotment. We urge the future FEIS and FROD provide the flexibility to navigate each site with targeted grazing without the addition of expensive and time consuming NEPA.

- Page 64: "Consultation with WGFD will occur before domestic sheep or goat grazing will be implemented to prevent disease transmission to bighorn sheep."

Comment: WDA strongly opposes an additional consultation process, which is inconsistent with US Forest Service policy and regulation as well as the Statewide Local Working Group Plan. WDA requests removing this statement in its entirety.

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

Sincerely,



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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