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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.

May 7, 2014

Forest Supervisor
Medicine Bow – Routt National Forests
2468 Jackson Street
Laramie, WY 82070-6535

Dear Forest Supervisor,

Following are the Wyoming Department of Agriculture (WDA) comments pertaining to the United States Department of Agriculture Forest Service Medicine Bow – Routt National Forests (FS) Draft Environmental Impact Statement (EIS) for Invasive Plant Management.

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, objections or appeals and continue to provide us the opportunity to communicate pertinent issues and concerns.

We support the Proposed Action in concept, including aerial application, but have concerns regarding the analysis. We feel the FS has failed to properly analyze impacts in Chapter 3. Chapter 3 details direct and indirect impacts but fails to relate those impacts to the different treatment types from each alternative. Impacts, direct or indirect, should be correlated to treatment types and their different effect on the environment.

Incongruous evaluations of livestock grazing impacts to wildlife such as Canada lynx and snowshoe hare imply an inappropriate amount of emphasis placed on indirect impacts. For example, the FS states:

"In riparian areas within lynx habitat, grazing may result in reduced winter browse for snowshoe hares. Grazing may also impact plant communities that connect patches of lynx habitat and could modify the structure and composition." (Ch. 3, pg. 91, "Grazing and browsing")

We fail to see how this is related to a weed management plan or the cumulative effects of such plan. A very indirect impact to lynx as a result of improper or uncontrolled livestock grazing may be overutilization of vegetation resulting in weed encroachment which leads to changes in snowshoe hare habitat and reduction in prey availability for lynx. However, this is not related to targeted grazing by sheep and goats to control invasive plant species as outlined in the plan.

These analyses are well outside the scope of a plan, which should be directed towards the treatment, removal or suppression of invasive plant species, and how the different treatment types will affect the surrounding environment. The FS should only analyze livestock grazing under "Management Tools" as identified in Chapter 1. Analysis of the direct and indirect impacts on wildlife and habitat should be linked to herbicides and their direct contact with species and the treatment of weed infestations.

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In conclusion, while we do support the Proposed Action in concept, we do not agree with the analysis of impacts and find it difficult to fully understand the comprehensive impacts of the range of alternatives, including treatment methodology. We thank you again for the opportunity to comment and look forward to working with you in the future.

Sincerely,

for 
for Jason Fearneyhough
Director

JF/jb

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

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