



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

July 24, 2017

District Ranger Adriene Holcomb
Kemmerer Ranger District
Kemmerer Field Office
308 US Highway 189 North
Kemmerer, WY 83101

Dear Ranger Holcomb,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the US Forest Service (USFS), Kemmerer Ranger District's proposed project titled Kemmerer Grazing and Rangeland Management 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.

We appreciate the opportunity to comment and support the USFS proposal to renew the seventeen grazing permits listed. The Kemmerer Ranger District is one of the few remaining districts on the Bridger Teton National Forest with domestic sheep grazing. The WDA strongly supports continued grazing of domestic sheep on these lands and offer the following comments to include in the analysis.

Create Flexibility

WDA encourages the USFS ensure flexibility in the analysis for future management of livestock, vegetation, and range improvement projects. As the scoping notice states on Table 1, the Normal and Maximum Operating Season is very restrictive. WDA would support a much broader season of use to increase flexibility for future management, including high intensity short duration grazing, using livestock as a vegetation management tool, etc. In addition, we urge the USFS ensure adequate overlap dates with Bureau of Land Management grazing allotment dates. Changes in weather such as drought or high snowpack will require grazing permittees to adjust their seasons of use. If these permit dates are too restrictive and inflexible, the permittees may experience a negative impact to their operations.

Adaptive management practices should create a suite of options. WDA discourages the USFS from turning voluntary practices such as Adaptive Management Practices, mitigation measures, or Best Management Practices into Terms and Conditions.

Develop Ecological Site Descriptions (ESDs)

WDA supports the use of ESDs to determine site potential and Desired Conditions as proposed in Table 4. Many of the Desired Conditions in Table 4 include very specific statements, such as "effective ground cover at or near >85% of potential." Potential is determined utilizing ESDs, inclusive of soils, precipitation, and vegetation. We would oppose including restrictions or unobtainable goals in the permits without adequate data determining site potential based on ESDs.

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Avoid Darby Mountain Bighorn Sheep

WDA strongly opposes any analysis or adverse action against domestic sheep grazing on the Kemmerer Ranger District and the Darby Mountain Bighorn Sheep herd. The Bighorn/Domestic Sheep –Risk Management Strategy (Strategy) for Wyoming Herds on the Bridger-Teton and Caribou-Targhee National Forest includes 15 of the 17 allotments in the Strategy. Aspen Springs and Trespass Creek were not included in Table 6. Darby CHHR-Evaluation of risk of contact by foraging bighorn sheep and domestic sheep allotments.

The Strategy along with the State-wide Bighorn/Domestic Sheep Interaction Working Group Final Report identifies the Darby herd as a herd within a bighorn sheep non-emphasis area. It also states on page 14: *“these areas are the lowest priority areas where existing bighorn sheep populations will not be protected at the expense of domestic sheep grazing. The Forest Service does not anticipate addressing risks that domestic sheep may represent to this herd by means that would involve adverse permit actions.”*

All allotments identified in Table 6 in this project have a low modeled risk of contact. WDA emphasizes the risk of contact is not nose-to-nose, but the potential for a bighorn sheep to physically reach the boundary of an active domestic sheep allotment. The Response Strategy on page 18 states: *“No additional management provisions will be required in these allotments unless additional issues are identified...”*

The Darby bighorn sheep is an augmented herd, consisting of only animals transplanted in the late 1980s. This is not a core-native herd and therefore, the USFS should not analyze viability of the Darby herd in the Kemmerer Grazing Project.

Include the WDA

The WDA is very interested in serving as a Cooperating Agency with the Kemmerer Grazing Project. We respectfully request the USFS include us in the earliest stages of development, identification of a range of alternatives, and collaboration with grazing permittees. We genuinely want to support the USFS in their efforts to successfully analyze and issue a final decision in support of continuing domestic sheep grazing on the Kemmerer Ranger District.

We 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,



for 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
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department
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