



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

August 2, 2013

Melanie B Fullman, Acting District Ranger
Brush Creek/Hayden Ranger District
Medicine Bow-Routt National Forest
P.O. Box 249
Saratoga, WY 82331

Dear Ms. Fullman:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bud Project (Project) Notice of Proposed Action on the Medicine Bow-Routt National Forest (MBNF).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

We support the efforts of the MBNF to proactively manage forest lands and address the need to improve forest resource conditions in conjunction with restoring healthy ecosystem function. Reduction of high-hazard fuel deposits, overstory removal, and prescribed burning will increase forage suitable to wildlife and livestock, benefit wildlife habitat, and improve the ecosystem in the long-term. However, immediate impacts of the project may lead to adverse affects upon agriculture. For this reason, we offer the following comments.

WDA supports further analysis on lopping and scattering being considered as the "most desirable slash treatment" (pg 17). Sub-issue 1a (pg 5) illustrates the issue with treatment of slash piles by lopping and scattering, as it can cause an adverse affect upon large herbivore mammals in the area. Scattering slash piles may substantially reduce or impede wildlife and livestock's ability to forage for numerous years. The debris creates obstacles and cover to overcome, and may take years to decompose. We suggest the option of burning slash piles or "chipping" when possible to preserve forage availability for ungulates.

Livestock grazing should be considered and used as a tool to obtain vegetation objectives. Under issue 3 (pg 6), utilize livestock as a management tool to assist in accomplishing plant community diversity within the Bud Project area (Manier and Hobbs 2007¹). We advise MBNF work closely with grazing permittees and agriculturists who utilize the area to obtain objectives.

We urge MBNF make level 1 roads available to grazing permittees for administrative uses when possible. Due to decommissioning of roads as stated within the proposed action, WDA is concerned permittees will face reduced access to areas within the Bud Project. The Environmental Assessment (EA) should analyze the affects of decommissioning roads on permittees, as well as hunters, and we applaud the consideration under Sub-issue 2a.

¹ Manier, D.J. and N.T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: Livestock and wild ungulates influence structure and function. *Oecologia*. 152:739-750

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Under the section of "Other Resource Protections", bullet 16 (pg 20), the Bud Project plans for a 30 to 100 foot buffer for sensitive plant species. WDA insists peer-reviewed scientific data before we and support the potential buffers identified for the various plant species.

While the Project may have long-term beneficial effects for the allotment, the immediate impact upon permittees can be detrimental. We support the analysis of the decrease in Animal Unit Months (AUMs) in the treatment areas, along with other adverse impacts upon livestock grazing management and permittees. We encourage the identification of mitigation opportunities for the loss of AUMs due to disturbance of the allotment from prescribed burns, logging, and other described treatments. WDA also encourages the MBNF staff consider the possibility of an increase of AUMs within the allotment following treatments.

We advocate the analysis of increased road traffic due to proposed treatment projects for the allotment. Elevated traffic levels create an increase of dust in the area, causing a decrease of palatability of forage and vegetation. Increased traffic may result in collisions livestock and wildlife. We ask for the MBNF to analyze and consider mitigation.

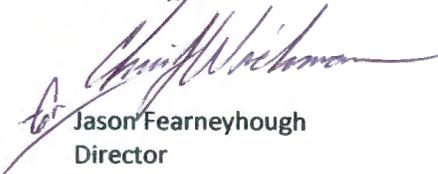
WDA insists on returning managed livestock grazing to treated areas at the first feasible opportunity. In order to lessen the immediate impact of vegetation treatments to permittees, a short timeline of deferment of grazing in the area will lessen the economic hardships they will face.

We strongly encourage the MBNF staff to work closely with all affected grazing permittees. Agriculture producers are intimately familiar with the area affected by the proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and forest health in the project area. We highly recommend the MBNF staff address the concerns and recommendations of these stewards of habitat, forage, and rangeland health.

As protectors of agriculture, we greatly appreciate analyzing needs for allotments in smaller areas. We support the MBNF making decisions on a case-by-case scenario. WDA would like to thank MBNF for analyzing the vegetation treatments in the smaller area of the Bud Project, rather than the alternatives under the larger project area of the Savery Analysis.

In conclusion, we support the MBNF's efforts to proactively manage forest lands and appreciate the opportunity to comment on the Notice of Proposed Action. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/jw/wm

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

Wyoming Game and Fish Department
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