



September 17, 2015

Mrs. Amy Ormseth, District Ranger
United States Forest Service
Tongue Ranger District
2301 Eastside 2nd St
Sheridan, WY 82801

Dear Mrs. Ormseth:

Following are the Wyoming Department of Agriculture (WDA) comments pertaining to the United States Forest Service, Tongue Ranger District (FS) proposed designation of a motorized trail, Lodge ATV Connector Trail Project (Project) and the associated Environmental Analysis (EA).

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.

Overall, there is an inappropriate correlation being drawn between livestock grazing, wildlife and the proposed trail. The EA has strayed from the Project and is analyzing issues entirely unrelated. Unless the FS provides specific information tying livestock grazing to the trail project, there should be little to no mention of grazing or grazing practices. The FS should refocus their efforts on the Project at hand - a new ATV trail and increased traffic. Along with this major flaw, the following specific issues should be addressed:

- **Pg. 12; Table 2:** *"Monitoring Question: Is trail use impacting livestock distribution and forage utilization? Are Tongue AMP standards for forage being met?; Monitoring Type: Riparian Stubble Height..."*

The EA clearly articulates the impacts to livestock distribution, even if they are minor. The height of riparian vegetation is not an appropriate metric to determine whether or not livestock distribution and forage utilization are impacted by the trail. Further, we do not believe there is any latitude within this document allowing the FS to change allocations based on what may or may not be related. We insist the FS applies "Riparian Stubble Height" the appropriate level (Allotment Management Plan, etc.) and remove this from the EA.

- **Pg. 14; Table 3:** *"Action: Livestock Grazing; Date and Description: Some unquantified level of grazing occurs on the private land located on both sides of U.S. Highway 14."*

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Private lands should not be analyzed by the FS. Remove this statement.

- **Pg. 24, 25; Water Quality:** *"...seasonal fluctuations in bacterial concentrations during times of livestock grazing. This is based on four years of water quality data collected on the North Tongue River on the forest (unpublished)."*

The FS cannot definitively identify livestock grazing as a causal factor for fluctuations in bacterial levels. The lack of author and date can only lead us to assume this was not collected by someone with the proper expertise. Perhaps even more important is the lack of relevance these statements have within an EA that should analyze impacts of increased vehicle traffic on water quality. Remove these statements.

Additionally, the FS should coordinate with the Sheridan County Conservation District on all water quality issues. We also recommend the FS use peer-reviewed sources and clearly list them under a "References" section.

- **Pg. 25; Wetlands and Riparian Areas:** *"...and livestock grazing have impacted the South Tongue River watershed. An ecosystem assessment by Winters and others suggests riparian areas and wetlands...have been substantially altered..."*

This seems to be opinion. The statement implies there is baseline data on the original condition of riparian and wetland areas. Further, there is no way to determine what Winters et al. 2004 actually says since the EA is lacking a "References" section. Remove these statements.

- **Pg. 28; Cumulative Effects:** *"Based on past effects of livestock grazing and the continuation of livestock grazing in the future, this action was considered in the cumulative effects analysis."*

This is speculative. Remove this statement.

- **Pg. 32; Table 5: "Actions-Livestock grazing; Effect(s) – Can affect food sources. Streambank trampling."**

There is an important distinction between proper and improper livestock grazing which is not clearly portrayed by this statement. The statements portray all livestock grazing as having a negative influence on wildlife habitat. Proper livestock grazing can improve habitats, while improper grazing may negatively influence them. Change to read "Can affect food sources and habitats (positively or negatively)".

- **Pg. 35; Cumulative Effects:** *"...livestock grazing on NFS and on a 580-acre private inholding..."*

The EA should not analyze private lands or actions on them.

- **Pg. 35; Cumulative Effects:** *“Livestock grazing on the private inholding in the project area has greater potential to affect water vole habitat...”*

The EA should not analyze private lands. The statements in this paragraph are not only speculative but inflammatory. The paragraph also seems to imply that there is better habitat on private lands than FS which would be contrary to other portions of the paragraph. Remove this section.

- **Pg. 39; Table 7, Blue Grouse:** *“Livestock grazing can affect grass and seed production which can be food sources. The cumulative impact of project effects and effects from these other actions would be potentially higher mortality for individual blue grouse.”*

Livestock grazing has again been portrayed as only producing negative impacts to wildlife. Again, we fail to see the relevance of these statements in regard to a trail project which will only increase the number of vehicles moving through the area. Any changes in livestock distribution due to the increased traffic on the trail will not impact blue grouse, especially in terms of “individual mortality”. Remove the statement regarding livestock grazing.

- **Pg. 40, Table 7, Merriam’s turkey, cont.:** *“Hunting, livestock grazing, and recreation could also affect turkeys...Livestock grazing can affect grass and seed production which can be food sources. The cumulative effects of these activities and the proposed route would likely be displacement of turkeys or a shift in their use of the landscape.”*

Displacement of turkeys due to hunting would be short-lived during the hunting season. Long-term displacement would be a result of increased traffic on the proposed trail. Livestock grazing doesn’t even constitute a disruption. Similar to above, grazing should not be a part of this discussion. Remove the statements regarding livestock grazing. For both Merriam’s turkey and Blue grouse we recommend reviewing the Moose section for a logical summary of effects.

- **Pg. 44; Second Paragraph:** *“Loss of grazeable acres would concentrate the same livestock numbers on fewer acres than were used to calculate carrying capacity of the allotments. The additional grazing pressure would make it more difficult to meet allowable use standards and achieve desired conditions. Loss of grazeable acres would also increase the management intensity, which would increase the cost for the permittee. Riders would have to spend more time trying to get livestock to use areas of altered distribution because livestock would not instinctively use them.”*

The paragraph before this states: *“...effects would reduce the rider’s time spent distributing livestock...”* yet the second paragraph contains conflicting statements. There also seems to be an underlying assumption that the allotments are operated at full carrying capacity now but the EA does not state this. Remove this.

- **Pg. 45, 46: Last Paragraph:** *"...the cumulative loss of grazeable acres would concentrate existing permitted livestock on fewer acres. Without a corresponding reduction of permitted numbers, the increased grazing intensity would make it difficult to achieve desired conditions..."*

This EA is not the proper mechanism for determining what permitted numbers should be. Additionally, it is unknown what level the allotments have been stocked at (actual use) and whether or not a reduction would be necessary. This is opinion and has not been analyzed. We insist this statement be removed and are entirely opposed to any reductions in livestock numbers. If a reduction is deemed necessary the permittees must be compensated for this loss.

Aside from our specific comments above, we are very concerned that this EA has not truly assessed the impacts to permittees. While few vague references are made, we do not feel the EA has adequately analyzed how this could impact permittees' livelihoods. If there will be changes to livestock distribution, increased work required of riders, and a change in forage availability to any allotment, as the EA implies, a full economic impact analysis should be completed to assess the actual cost to permittees. Additionally, the lack of a Reference section within the document, and using references such as "unpublished" is highly concerning.

In conclusion, we 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
Wyoming Wool Growers Association