



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

September 8, 2015

Rob Hoelscher
Pinedale Ranger District
PO Box 220
Pinedale, WY 82941

Dear Mr. Hoelscher:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Grazing Authorization for the Raid Lake, Cross Lake, and East Fork Allotments (Allotments) on the Pinedale Ranger District, Bridger Teton National Forest (BTNF).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is 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 appreciate the BTNF providing us the opportunity to comment on the three Allotments. We strongly oppose closing the three Allotments to domestic sheep grazing. Specifically, the WDA Board of Agriculture's (BOA) policy states; *"Grazing is a tool to enhance natural resources to meet desired goals. Therefore, the BOA desires grazing land management to protect the no net loss of AUMs. No net loss includes, but not limited to drought, the ability to sell permits, and historical sites."*

The domestic sheep industry has drastically and continually declined due to many factors, including market conditions, difficulty hiring skilled labor, and most recently discussion of the Region 4 Risk Assessment Model to ensure viability of bighorn sheep. While the BTNF has not implemented the Risk Assessment Model, domestic sheep producers are selling their sheep, considering permit buyouts, or in this case waiving their permits back to the US Forest Service (USFS) in anticipation of an adverse decision.

The USFS has actively participated in the development and implementation of the Statewide Bighorn Domestic Sheep Interaction Working Group Plan (Plan) since 2004. The Plan is a successful, collaborative approach to guide the Wyoming Game and Fish Department's (WGFD) management of bighorn sheep, while ensuring protection of Wyoming's domestic sheep industry. One of the Plan's goals is a *"no net loss of domestic sheep industry AUMs in Wyoming."*

We understand the State of Wyoming and the USFS is drafting a Memorandum of Understanding, which proposes the USFS accept the Plan as the appropriate management for bighorn sheep in Wyoming, as well as clearly identifying WGFD as the managing agency of the state's wildlife species.

Currently WGFD manages the area surrounding these three Allotments as a Cooperative Review Area. A Cooperative Review Area is an area *"of suitable bighorn sheep range where proposed changes in bighorn sheep*

Equal Opportunity in Employment and Services

BOARD MEMBERS

Jana Ginter, *District 1* • James Rogers, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*
Bryan Brost, *District 6* • Kevin Schieffer, *District 7*

YOUTH BOARD MEMBERS

Kendall Roberts, Southeast • Richard Schlenker, Northwest • John Hansen, Southwest • Cameron Smith, Northeast

9/8/2015

Page 2 of 2

management or domestic sheep use will be cooperatively evaluated." A Cooperative Review Area does not favor bighorn sheep over domestic sheep, but rather finds a compromise for management of both.

USFS Region 4 staff has assured WDA, WGFD, Wyoming Livestock Board, domestic sheep producers, and others of their intent to identify vacant allotments and forage reserves prior to enforcing the Risk Assessment Model and no final decisions to close allotments will occur. We urge the BTNF to refrain from making any decisions on these Allotments prior to making them available to other domestic sheep producers.

We strongly urge the BTNF avoid making any decisions on any allotments until existing grazing permit holders have the opportunity to consider all possible solutions to address the Risk Assessment Model findings, if in fact there is habitat overlap or proven conflict between domestic and bighorn sheep.

The notice to comment states the intent is to *"consider resource impacts" or "potential resource issues that should be considered and are of concern to you."* We urge the BTNF to ensure neutral scientific data is collected and analyzed prior to making any decisions regarding "resource impacts" and avoid using personal biases or opinions of domestic sheep grazing incompatibility in Wilderness Areas. Domestic sheep grazing pre-dated the designation of the Wilderness Area. The Wilderness Act of 1964 states *"the grazing of livestock, where established prior to September 3, 1964, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture."* Therefore, we support domestic sheep grazing as a compatible, multi-use within the designated Wilderness Area.

We also ask BTNF consider and analyze the economic impacts to the community and ranching industry, as well as the possible impacts to wildlife and open spaces. Federal grazing permits are crucial to a commercial livestock operation. The cumulative impact of federal agencies reducing or eliminating livestock grazing on public lands could include increased subdivision and loss of open spaces.

We support the BTNF working closely with the WDA and members of the Statewide Working Group to avoid making any premature decisions on these Allotments. We ask the BNF to include us in all future planning meetings pertaining to these Allotments Please feel free to contact Justin Williams, Senior Policy Analyst at 307-777-7067 if you have further questions or concerns.

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