Wyoming
Department of Agriculture

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March 31, 2005

Shoshone National Forest
North Zone – Clarks Fork Ranger District
Marty Sharp
NEPA Coordinator
203 A Yellowstone Ave.
Cody, WY 82414

RE: Bald Ridge II Vegetation Management project

To Marty Sharp:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the scoping document to address forest conditions on the Clarks Fork Ranger District of the Shoshone National Forest (SNF).

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 forest treatments have major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, it is important that the WDA remain involved in all actions and decisions affecting the agriculture industry and that we have the opportunity to express pertinent issues and concerns.

Continued decline in the condition and acreage of healthy forests and the degraded condition of grassland, shrub and aspen communities by conifer encroachment will increasingly have adverse effects on livestock grazing. We support efforts to restore the vegetative and age-class diversity of a fire-adapted ecosystem to forest stands in Wyoming. We are pleased to see forest and range health considered at a broad scale, versus at a much smaller and individual project scale.

We ask that the SNF continue to work with all livestock grazing permittees who may potentially be adversely affected by this project. We ask that conversations and inclusion in the project remain forefront to ensure the recovery of the treatment areas, while not negatively impacting the economic viability of the grazing permittees. We request the duration of time needed after prescribed burning be evaluated on a case-by-case basis in cooperation with the grazing permittees, rather than adhering to a predetermined nationwide policy.

If fencing is required to ensure vegetative regeneration following treatments, the WDA is concerned the cost and labor for fence maintenance will fall on the livestock permittee. Livestock permittees want to maintain fences on their allotment to ensure a sustainable grazing pattern. This maintenance is currently a cost to their livestock business, and additional costs are not welcome.

Using fencing to protect forest regeneration treatments can remove available water for livestock, thus altering the grazing pattern in many allotments. Removing available water for livestock can create an undesired grazing impact within the allotment. We recommend the SNF explore the development of alternative water sources in allotments if and where fencing is utilized.

Ultimately, fencing lowers the available forage in a grazing allotment. Will the AUMs per allotment be equally reduced? Are the livestock permittees responsible for any resource damage that occurs within an allotment, which maybe caused by other ungulates?

Wyoming ranchers and their private ranch land rely on federal grazing for social and economic productivity. The ability for ranchers to graze federal lands is critical for their operation to remain economically viable. The loss of ranchlands is a very crucial issue, as the impacts of subdividing private ranch land in the surrounding area will have an extreme-demonstrative effect on the wildlife populations, their prey base, and available open space and habitat. This subdivision of private ranchland is far worse on the ecosystem, especially when compared to the minuscule utilization of forage by livestock in an allotment. If grazing permits are decreased, the SNF can count on the eventual decrease of wildlife habitat on the private ranchland.

Please continue to include the WDA as an interested party in this analysis. All future information should be sent to:

Wyoming Department of Agriculture
Natural Resource and Policy Section
Matt Hoobler, Sr. Policy Analyst
2219 Carey Ave.
Cheyenne, WY 82002

wdapolicy@state.wy.us

We appreciate the opportunity to comment.

Sincerely,

John Etchepare
Director

JE/mh

Cc: Governor's Planning Office
Wyoming Game and Fish Department