



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

August 27, 2010

Julie Wheeler
Black Hills National Forest
Bearlodge Ranger District
101 South 21st Street
Sundance, WY 82729

Dear Ms. Wheeler:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Environmental Assessment (EA) for Bearlodge 2010 Range Project on the Bearlodge Ranger District of the Black Hills National Forest (BHNF).

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 EA 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.

The WDA supports Alternative 2 (the Proposed Action) to continue permitting livestock grazing by incorporating adaptive management on the Addition, Beaver Creek, Divide, and Oak Creek allotments to meet Forest Plan direction. This alternative allows BHNF personnel the flexibility to change livestock grazing management in a timely manner to maintain and improve rangeland conditions. Furthermore, we support the use and development of range improvement projects to achieve healthy rangelands for the benefit of livestock and wildlife.

Following are the WDA's specific comments to the EA:

Table 5. Alternative 2 proposed actions by allotment, pages 19-24:

Table 5 discusses the desired conditions, existing conditions, and adaptive management options for each benchmark or area of concern. The WDA does not support the possible reduction of Animal Unit Months (AUMs) in areas currently meeting desired conditions with no overutilization. It is our belief BHNF personnel and livestock grazing management is appropriate AUMs in these areas and reductions in AUMs are not necessary.

Table 8. Summary of environmental impacts, page 40:

The relevant resource tracking issue of soil and water describes the impacts of Alternative 1 (No Action/No Livestock Grazing Alternative). The WDA recommends noting in this table that some trampling will still occur under Alternative 1. Areas of high wildlife concentration will show signs of trampling.

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Environmental Consequences, Alternative 1 – No Action, Direct and Indirect Effects Common to All Allotments, Water, page 55;

Wildlife and other animals will deposit feces in streams or upslope areas.

Environmental Consequences, Alternative 2 –Proposed Action, Direct/Indirect Effects Specific to Each Allotment, Cumulative Effects, page 81:

The WDA appreciates the discussion including effects of recreation *on* livestock and livestock grazing management. However, the discussion states “When added to livestock grazing, these uses may have an overall negative effect...” The WDA strongly recommends this language be removed, as effects due to recreation will continue to occur with or without livestock grazing on BHNF lands.

Cumulative Effects Analysis:

The EA fails to identify the possible effects of fencing private lands if Alternative 1 (No Action) is chosen. It is important to fully analyze the effects of additional fencing on livestock production, rangeland health, wildlife habitat and movement, recreation and open space.

The WDA appreciates the use of references and monitoring trends in the EA. Peer-reviewed science and on-the-ground observations make the document stronger and justifies the BHNF decision to continue livestock grazing with adaptive management in place on each of the allotments.

In conclusion, the WDA supports the continuance of commercial livestock grazing in each of the four allotments. We appreciate the opportunity to comment on the proposed actions. 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/jc

CC: Governor’s Planning Office
Rocky Mountain Farmer’s Union
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association
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