



Wyoming
DEPARTMENT OF Agriculture

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

November 30, 2009

Julie Wheeler, Rangelands Staff
Black Hills National Forest, Bearlodge Ranger District
Box 680
Sundance, WY 82729

Dear Ms. Wheeler:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bearlodge 2010 Range Project Environmental Analysis (EA) scoping 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 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.

The WDA supports the continuation of livestock grazing by incorporating adaptive management on all allotments to meet Forest Plan direction. This allows BHNF personnel the flexibility to change livestock grazing management in a timely manner to maintain and improve rangeland conditions. In addition, we encourage a discussion of the importance of using livestock as a tool to achieve natural resource objectives, such as improving wildlife habitat (Anderson and Scherzinger 1975¹, Derner et al. 2009², Severson 1990³). Furthermore, we support the use and development of range improvement projects to achieve healthy rangelands for the benefit of livestock and wildlife.

The WDA does not support a no grazing alternative. Such an alternative would have negative and significant consequences on vegetative resources, wildlife habitat, and the local economy. In addition, it is clear under the current Forest Plan that analysis of a no grazing alternative is not necessary.

Management prescriptions in the EA must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on Forest Service-administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing needs to be specifically noted. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that...the public lands be managed in a manner...that will provide food and habitat for fish and wildlife and domestic animals..." Many in the public are unaware of this Congressional policy. Yet this policy is critical to the continuance of livestock grazing on public lands and should be expressed in this assessment.

¹ Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. *Journal of Range Management*. 28:120-125.

² Derner, J. D., W. K. Lauenroth, P. Stapp, and D. J. Augustine. 2009. Livestock as ecosystem engineers for grassland bird habitat in the Western Great Plains of North America. *Rangeland Ecology and Management*. 62:111-118.

³ Severson, K. E. 1990. Summary: Livestock grazing as a wildlife management tool. *In: Can livestock be used as a tool to enhance wildlife habitat. General Technical Report. RM-194 p. 3-6. U. S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.*

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Grazing on public lands represents a vital economic value to agricultural producers and to local communities. Impacts on this economic activity need to be included in the EA. In addition to its economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the EA.

The WDA appreciates the fact that BHNF personnel will use monitoring to determine if and when changes to livestock grazing management are needed and we strongly encourage joint cooperative monitoring continue. We recommend using the Wyoming Rangeland Monitoring Guide (2008) and specifically outlining monitoring schedules and methods for each of the allotments. It is particularly important that riparian area monitoring criteria are developed and methods for monitoring willow utilization are evaluated and clearly outlined.

We strongly encourage BHNF staff to work closely and consistently with all affected grazing permittees. Agriculture producers are intimately familiar with areas affected by this EA and possess irreplaceable long-term, on-the-ground knowledge. We highly recommend BHNF officials seek and address the concerns and recommendations of these producers. Moreover, it is imperative that BHNF officials continuously inform all livestock grazing permittees who are directly or indirectly affected by this EA of the issues, decisions, and resulting actions regarding this proposal.

Decisions in the proposed plan should allow BHNF officials, grazing permittees and private landowners the opportunity to work cooperatively. This EA should also allow flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

In conclusion, the WDA supports the continuance of commercial livestock grazing on the Addition, Beaver Creek, Divide and Oak Creek allotments. We appreciate the opportunity to comment on the scope of the proposed EA. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/jc

CC: Governor's Planning Office
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
Wyoming Wool Growers Association