

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



Wyoming Department of Agriculture

March 31, 2009

Misty A. Hays, Deputy District Ranger
Douglas Ranger District
Medicine Bow National Forest
2250 East Richards Street
Douglas, WY 82633

Dear Misty Hays:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to prepare an environmental document under the National Environmental Policy Act (NEPA) proposing to continue commercial livestock grazing on 22-grazing allotments located within the Horseshoe/Cottonwood Analysis Area (HCAA) of the Laramie Peak Unit on the Medicine Bow-Routt National Forest and Thunder Basin National Grassland.

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 we be kept informed of proposed actions and decisions and continue to be provided the opportunity to express pertinent issues and concerns.

The proposed action in the Scoping Document intends to analyze the 22-grazing permits within the HCAA. Changes to any of the allotments will significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the project area. The WDA requests the Douglas Ranger District analyze the following impacts.

Management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing, needs to be specifically noted in the environmental document. 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 and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The Douglas Ranger District needs to include impacts on this economic activity in the analysis. We urge Douglas Ranger District officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of

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Agriculture, who conducted several studies showing how federal policies impact agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Sheep and cattle have grazed these allotments for over 100 years. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Douglas Ranger District should include losses of these essential environmental, historic, and social values of livestock grazing in the scope of the analysis.

The WDA appreciates the efforts of the Douglas Ranger District staff in working with interested permittees and strongly urge this practice continues with all permittees located within the 22-grazing allotments. We encourage Douglas Ranger District officials to work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge that should be utilized to its full advantage. Producers are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound. Thus, we strongly recommend Douglas Ranger District officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring grazing permittees who are directly affected by this plan receive all notices about this renewal.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The environmental document and analysis needs to include (1) the positive effects livestock grazing has upon the environment, and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Forest Management Plan.

We must remember that livestock grazing is an approved activity in the Revised Forest Management Plan (2003). The Douglas Ranger District decisions made in the proposed action should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions and be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims.

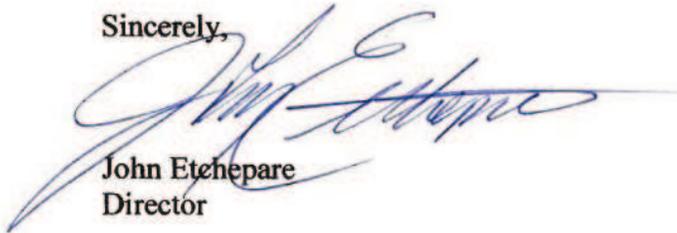
The WDA does not support the evaluation of a "No Grazing Alternative" in the environmental document because livestock grazing has already been analyzed and approved in the Revised

Douglas Ranger District
Medicine Bow-Routt National Forest and Thunder Basin National Grassland
22-Grazing Allotments
Horseshoe/Cottonwood Analysis Area and Vegetation Management Project
03/31/2009
Page 3

Forest Management Plan (2003). Reductions, limitations or actions prohibiting livestock grazing in the HCAA are considered an adverse impact. It is important the Douglas Ranger District analyzes potential identified issues in the analysis on a case-by-case basis while considering all the potential causal factors associated with a potential issue, rather than isolating or focusing on just livestock grazing.

We strongly support the continuance of commercial livestock grazing on the 22-grazing allotments. We appreciate the opportunity to comment on the scope of the proposed action. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Etchepare", is written over a printed name and title.

John Etchepare
Director

JE/cw

CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
State Grazing Board