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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.

May 13, 2011

Tracy Hollingshead, District Ranger
Kemmerer Ranger District
Bridger-Teton National Forest
308 U.S. Highway 189 North
Kemmerer, WY 83101

Dear Ms. Hollingshead:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the proposed LaBarge Vegetation Restoration Project (Project) Environmental Assessment (EA) for the Kemmerer Ranger District (KRD) of the Bridger-Teton National Forest.

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 vegetation restoration 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 provide us the opportunity to express pertinent issues and concerns.

The WDA understands the need to improve forest resource conditions in conjunction with restoring healthy ecosystem function. Tree removal, mechanical treatments of conifers and aspen, along with prescribed fire will open the canopy, increase herbaceous vegetation and assist in achieving desired resource conditions. These proposed management actions will benefit ecosystems, wildlife habitats and forage for wildlife and livestock.

The Purpose and Need for this Project is to accomplish resource goals and objectives and move the landscape toward the Desired Future Conditions (DFC) established in the 1990 Land and Resource Management Plan (Forest Plan). The majority of the project area consists of DFC 10 and DFC 1B, with only minor portions of other DFCs present in the project area as identified in the Forest Plan. DFC 10 specifically states its management emphasis is to; "...managed in balance with timber harvest, grazing, and mineral development." While its vegetation: range prescription states; "Range is managed to maintain and enhance range and watershed conditions while providing for forage for livestock and wildlife." DFC 1B's management emphasis; "...is on scheduled wood-fiber production and use, on livestock production, and other commodity outputs." We recommend the proposed actions in the EA align with the appropriate goals and objectives set forth in the Forest Plan, and provide an explanation on how each proposed treatment will accomplish the DFC.

The Scoping Letter does not address the DFCs directly and neglects to include livestock grazing in the analysis. The WDA urges the KRD to analyze the following effects upon livestock grazing in the EA: introduction and spread of noxious weeds, mitigation and reclamation of disturbed areas, impacts upon livestock grazing by vegetation treatments, impacts from new and modified roads, increased number of vehicles in the project area causing harm to livestock and livestock operations, gates left open, and other detrimental social and economic impacts upon livestock operators and livestock management operations.

We request the KRD evaluate treated areas and the duration of time needed before grazing can occur on these areas, and these areas be evaluated on a case-by-case basis in cooperation with grazing permittees rather than adhering to a

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predetermined nationwide policy. Managed livestock grazing is encouraged at the first feasible opportunity. We do not support resting an allotment prior to a prescribed fire, but strongly recommend KRD staff work closely with permittees before and after a proposed treatment to limit impacts to livestock grazing operations.

We encourage KRD officials continue socio-economic analysis of livestock grazing operations in the vicinity of the project area working with all livestock grazing permittees who may experience adverse affects created by the Project. Grazing on public lands is of significant economic value to agricultural producers as well as local communities. The impacts created by the proposed Project could initially decrease revenues for grazing permittees and other agricultural producers. We ask the KRD to consider these additional concerns in the EA, along with a thorough.

The proposed Project should allow Forest Service officials, grazing permittees and private landowners the opportunity to work cooperatively. We encourage the KRD incorporate flexibility into the environmental document to manage/mitigate impacts and make decisions using the best available science and site specific monitoring data. The KRD should also make decisions on a case-by-case basis in the best interest of the affected resources throughout the life of the proposed Project.

In conclusion, the WDA appreciates the opportunity to comment on the scope of the proposed Project. We encourage continued attention to our concerns and look forward to hearing and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/cw

CC: Governor's Planning Office Wyoming
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