

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.



Dave Freudenthal, Governor
John Echepare, Director

August 26, 2008

Jay L. Dunbar, District Ranger
Greys River Ranger District
Bridger - Teton National Forest
P.O. Box 339
Afton, WY 83110

Dear Mr. Jay Dunbar:

Following are the comments of the Wyoming Department of Agriculture (WDA) on your Scoping Notice for a proposed Environmental Assessment (EA) for the Little Greys Cattle & Horse Allotment in the Greys River Ranger District of the Bridger - Teton National Forest.

Our comments are specific to our mission: to be dedicated 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 that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

The proposed revisions to the Allotment Management Plan (AMP) will significantly impact grazing permittees, agriculture producers, and landowners, in and near the Little Greys Cattle and Horse Allotment. These impacts must be included in the analysis.

Consider comments regarding the scoping statement dated March 25, 2008

We encourage the Bridger-Teton National Forest (BTNF) to consider our comments regarding specific areas of the Scoping Statement. The WDA comments are as follows:

- **Background Information Section** (Page 1) states that the allotment is located within DFC-1B and DFC-12. DFC-1B is "...managed for commercial activities with many roads and moderate to occasional emphasis on other resources. Management emphasizes scheduled wood-fiber production, livestock production, and on other commodity outputs." DFC-12 is "...managed for high-quality wildlife habitat and escape cover, big-game hunting opportunities, and dispersed recreation activities."
 - The Purpose and Need Statement does not consider the differences in management of each pasture as it relates to the BTNF Land and Resource Management Plan (Forest Plan). It is intuitive that these two management areas have differing strategies and output measures and should not be treated as having the same allowable-use standards.
 - The analysis in the EA must consider the differences in the two management areas.

BOARD MEMBERS

Juan Reyes, District 1 ■ Jack Corson, District 2 ■ Jim Mickelson, District 3 ■ Jim Bennage, District 4 ■ Joe Thomas, District 5 ■ David J. Graham, District 6 ■ Gene Hardy, District 7
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- Purpose and Need Section (Paragraph 1, Page 2) states “The existing livestock grazing management program on the allotment has evolved over several decades that has allowed for the upward trends in rangeland conditions.”
 - Give the permittees credit for their stewardship and proper management to allow for the improvement of the rangeland conditions.
 - Do not penalize the permittees for ecological factors beyond their control, such as severe drought conditions, limited fire frequency, high sagebrush canopy cover, and encroachment of aspen, etc.
 - Consider the recent improvement in rangeland conditions that has occurred during severe drought conditions, and consider all other ecological factors that affect rangeland conditions.

- Desired Conditions Section (Paragraph 1, Page 3) states “...some of the resulting ecological conditions (e.g., high sagebrush canopy cover) may currently limit recovery of some plant communities more than the current effects of livestock grazing.”
 - It is clear by this statement that the allotment has several issues regarding its current conditions and livestock grazing is only one of many factors needing analyzed in the EA.
 - Do not single out livestock grazing.
 - Other factors to consider in the EA are the several consecutive years of drought conditions, wildlife impacts on vegetation and riparian areas, recreational uses, reduced fire frequency, encroachment of aspen, sagebrush canopy cover, etc.

- Current Management (No Action Alternative) Section (Best Management Practices, Bullet #2, Page 5) states “If the allowable-use is reached on key areas prior to the scheduled off-date, permittees are required to remove their livestock from the allotment earlier than scheduled.”
 - We support proper grazing management as a way of ensuring a standard for healthy range conditions for key areas.
 - The current management practices do not need to be revised, based on existing data and upward trend of vegetative conditions,
 - Reducing the time on the allotment from 113 days to 93 days does not ensure a positive change will occur in key areas.
 - Ways in lessening the impacts to key area that need to be considered: stockwater facilities developed away from key areas, distribution of minerals away from key areas, electric fence, and herding, etc.
 - We strongly encourage the BTNF to maintain the current season-of-use days at 113.

- Proposed Action Section (Best Management Practices, Bullet #2, Page 6) states “Livestock are removed from each pasture and/or the allotment based on allowable-use standards designed to ensure the remaining herbaceous plant material is sufficient to provide for plant vigor, litter, soil protection, sediment trapping (in

riparian zones, wild forage (e.g., leaves, seedheads, flowers), wildlife cover (e.g., for nesting and hiding), fine fuel for fire spread as needed for resource benefit, and to alleviate browsing on willows.”

- The above stated allowable-use standard description is better defined in the Proposed Action. However, it reflects the exact same principals of the allowable-use standard covered in the No Action Alternative.
- Proposed Action Section (Best Management Practices, Bullet #4, Page 6) states “Proper stocking rates are maintained and livestock distribution is managed to protect riparian and meadow systems, and other sensitive and fragile areas...livestock grazing intensity needs to be managed at levels that maintain the composition, density, and vigor of desired plants and not damage or contribute to a loss/reduction of riparian soils, streambanks, or water quality.”
 - This statement contradicts the idea of reduced time period on the allotment or pasture improving rangeland conditions and supports the management of livestock in key areas to ensure improvement of rangeland conditions.
- Proposed Action Section (Livestock Numbers, Season of Use, and Grazing System, Bullet #1, Page 10) states “The season of use would be reduced by 20 days, from 113 days down to 93 days, with a turnout date no earlier than June 15. This would reduce the amount of time spent in any given pasture...”
 - Reduction in time would reduce time spent in any given pasture, is no guarantee that the reduced time would effectively reduce impacts to key areas.
 - We do not support the reduction in time, which correlated to a reduction in Animal Unit Months (AUMs), but do support proactively managing livestock in key areas to ensure improvement of rangeland conditions.
- Proposed Action Section (Livestock Numbers, Season of Use, and Grazing System, Bullet #2, Page 10) states “If it is determined that additional cattle grazing could be accommodated in any given year without exceeding allowable-use standards in any pasture, the season-of-use could be extended, up to a total of 113 days...”
 - This statement is ridiculous. Why change the season of use standard to a lower amount and then allow additional cattle grazing until the allowable-use standard are met?
 - Maintain the current condition (113 days) and remove cattle once the allowable-use standard is met. This would simplify the situation and would not set an arbitrary number of days of use. It is not the amount of days in the allotment that matters but the allowable-use standard.

It is critical to further analyze the Little Greys Cattle and Horse Allotment prior to the release of a Draft EA. It is our sincere recommendation for no change to occur to the season-of-use and the BTNF maintain the allotted days at 113. We support the expanded definition of allowable-use standard for all the key areas; and strongly encourage the BTNF to

reconsider the proposed reduction in time of 93 days and support and enforce the current allowable-use standard.

Consider Socio-Economic Impacts

Most environmental analyses are woefully deficient in identifying or analyzing social and economic impacts. We appreciate the fact that ranger district staff include numerous and diverse environmental specialists, yet no social and economic analysts. As a result, virtually all environmental analyses ignore or understate the social and economic impacts of livestock grazing upon grazing permittees and the communities they support. We specifically suggest that this analysis includes the social and economic impacts upon livestock grazing in and adjacent to the planning area.

The true economic impacts of livestock grazing upon local communities are often underestimated. Input-Output studies by the University of Wyoming reveal that nearly all livestock in Wyoming are sold out-of-state, yet nearly all expenditures by Wyoming ranchers are made in nearby communities. This infusion and turnover of out-of-state or new dollars into local communities created by livestock grazing needs to be reflected in the study. More importantly, the analysis needs to capture the impact of the loss of that infusion and turnover by ranching operations which may be impaired by the results of this analysis and any possible AMP revision.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important 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 study and the social impacts analyzed in the analysis.

The analysis should evaluate the impacts of this project upon the Congressional intent expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. The impacts upon food and habitat for fish and wildlife are usually well documented in the National Environmental Policy Act (NEPA) documents. The consequences of this project upon food and habitat for domestic animals deserve the same degree of study and documentation, which is deemed lacking in this situation.

Decisions in the proposed plan should allow Forest Service officials and grazing permittees the opportunity to work cooperatively. Peer-reviewed science should underlie decisions and the analysis needs to identify the science that supports the decision and discussions regarding this project. Flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens throughout the life of this plan should also be addressed.

Consider Including Appeal Process Language

If the proposed revisions to the AMP are carried forward into the final decision, it is important the Record of Decision (ROD) or Findings of No Significant Impact (FONSI) include the appropriate language allowing the permittee the right to appeal the decision. In Title IV – Range Management; Section 402 (Grazing Leases and Permits); sub-part (f) of FLPMA states: “Secretary concerned under appropriate regulations shall grant to lessees and permittees the right of appeal from decisions which specify the terms and conditions of allotment management plans”.

Conclusion

In conclusion, we find it very disturbing the BTNF chose to reduce the season-of-use time arbitrarily by 20 days, without substantiating the reason or displaying the scientific data to support the reduction. It also appears the simple solution is to use the existing allowable-use standards (or new better defined allowable-use standard in the Proposed Action) and simply enforce the standard of use. An arbitrary time reduction does not ensure the allowable-use standards is met and does not ensure rangeland health.

The WDA does not support any proposal that will reduce AUMs on an allotment or reduced season-of-use.

The WDA appreciate the opportunity to comment on the Scoping Notice for the proposed EA and would like the ability to review and comment on the Draft and Final EA when it becomes available. We encourage continued attention to our concerns and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



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
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Lincoln County Commissioners
Little Greys River Cattle Association