



January 19, 2010

Joe Harper, Acting District Ranger  
Pinedale Ranger District  
Bridger - Teton National Forest  
29 East Fremont lake Road  
P.O. Box 220  
Pinedale, WY 82941

Dear Mr. Harper:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Scoping Notice for Pinyon Osborn Vegetation Treatments Project located in the Pinedale Ranger District of the Bridger – Teton National Forest (BTNF).

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

We support the efforts of the BTNF to proactively manage forest lands and to address the need to reduce fuel accumulations that have built up due to the lack of disturbance over the past 100 to 150 years, while creating a mosaic of early-, mid- and late-seral stages of habitat types. The long-term effects of the proposed management prescriptions will increase plant diversity, sustain a healthier forest, create habitat for wildlife, increase forage quantity and quality for both wildlife and livestock and decrease the potential for catastrophic wildfires. However, the immediate and potential secondary effects of the proposed project will impact grazing permittees and agriculture producers both in and adjacent to the proposed project area. For this reason, we offer the following comments.

#### Consider Impacts to Grazing Allotments

- The immediate impact on livestock grazing is the decrease in Animal Unit Months (AUMs) in the active treatment area. Although this is considered temporary, we ask the BTNF staff analyze this impact to livestock grazing.
- Due to the large size of the proposed project/prescribed fire. We strongly encourage BTNF staff identify mitigation for the loss of AUMs due to the disturbance and look at potential alternative grazing areas for permittees to utilize.
- The proposed project may increase costs and decrease revenues for grazing permittees utilizing the project area for their livestock grazing operations, by increasing livestock

#### BOARD MEMBERS

Juan Reyes, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • Jim Bennage, *District 4* • Joe Thomas, *District 5*  
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

#### YOUTH ADVISORY BOARD MEMBERS

Patrick Zimmerer, Southeast • Dalin Winters, Northwest • John Hansen, Southwest • Bridget Kukowski, Northeast

management and the potential loss of AUMs. The accumulated impacts of the proposed project, in addition to nearby and future projects are a continuous concern to the WDA and permittees. The individual and cumulative impacts and proposed remedies need to be thoroughly identified and evaluated.

- We encourage the BTNF staff analyze the duration of time needed before grazing can occur on prescribed burn areas on a case-by-case basis in cooperation with livestock grazing permittees. We encourage the use of managed livestock grazing in the treated areas at the first feasible opportunity.
- We insist on timely and successful reclamation and mitigation on disturbed areas. This includes the monitoring and eradication of invasive and noxious weeds in all disturbed areas until desired vegetation is established.

We strongly encourage the BTNF staff to work closely with all affected grazing permittees. Agriculture producers are intimately familiar with the area affected by the proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and forest health for the subject area. We highly recommend the BTNF staff address the concerns and recommendations of these stewards of habitat, forage, and rangeland health.

In conclusion, we support the BTNF's efforts to proactively manage forest lands and we appreciate the opportunity to comment on the Scoping Notice for the proposed actions. We encourage continued attention to our concerns and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough  
Director

JF/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  
Wyoming Association of Conservation Districts  
State Grazing Board