



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

July 29, 2011

Carrie Christman, Forest Planner
Shoshone National Forest
Supervisor's Office
808 Meadow Lane Avenue
Cody, WY 82414

Dear Ms. Christman:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Draft Analysis of the Management Situation (AMS) for the Shoshone National Forest (SNF) Plan Revision (Plan).

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 Plan and AMS has the potential to affect 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 the opportunity to express pertinent issues and concerns.

Special areas and designations, page 16:

The AMS should describe the current uses in each of the special areas and special designations. For example, the Kirwin Historic Area is part of a grazing allotment and this information should be disclosed.

Current conditions of riparian communities, page 34:

The AMS states that some riparian communities within the SNF are outside their historic range of variability due to grazing. We would argue that current grazing practices are not impacting riparian communities and recommend changing "grazing" to "*historic grazing practices*."

Species of local concern, Protection of demand and need, page 70:

The WDA recommends that directions under the revised plan apply to mapped crucial winter range and not just mapped winter range. This provides an accurate description of areas where specific management may be proposed to protect habitat and will match more closely with Wyoming Game and Fish Department mapping efforts.

Commercial livestock grazing, Resource condition and trend, page 78:

The AMS does not describe the vegetative conditions on allotments or the number of allotments that are meeting desired conditions. We understand vegetative conditions are excellent on most commercial livestock grazing allotments and that 98% of the allotments are meeting or moving towards desired conditions. This is an accomplishment that should be showcased in the AMS.

The WDA would also like the status of vacant allotments added to the AMS. This includes: 1) How many are vacant, 2) How many of these allotments were sheep allotments and what is their current status (i.e.: still vacant, changed to cattle use, forage reserves, etc.) and 3) What are the current options for opening vacant allotments?

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Commercial livestock grazing, Figure 11 – Permitted versus actual cattle AUMs on the SNF, 1986 through 2010, page 80:

The graph depicts the changes in permitted cattle AUMs and actual cattle use. The WDA recommends adding information in the text describing that most reductions in actual use were voluntary based on drought or economic conditions.

Commercial livestock grazing, Need for change, page 82:

The “Need for change” section under commercial livestock grazing includes: “Prevent negative impacts to critical wildlife habitat” and “Prevent negative livestock grazing impacts in riparian areas by requiring increased herding.” Monitoring data provided by the SNF does not show current livestock grazing is causing a negative impact on wildlife habitat or riparian areas. The WDA recommends that these items be removed from the AMS as no change in current management is necessary to reach desired conditions in these areas.

Commercial livestock grazing, general:

The WDA recommends the AMS and impending Environmental Impact Statement includes more information about the impacts of other resource uses and protections on commercial livestock grazing. It is important to recognize that other uses, such as recreation, and resource protections, such as Resource Natural Areas, do have an impact on commercial livestock grazing.

In conclusion, the WDA appreciates the opportunity to comment on the Draft AMS. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/jc

CC: Governor’s Policy Office
Guardians of the Range
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Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming State Grazing Board
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