



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

November 15, 2010

Carrie Christman, Forest Planner  
USDA Forest Service, Shoshone National Forest  
808 Meadow Lane Avenue  
Cody, WY 82414

Dear Ms. Christman:

Following are the Wyoming Department of Agriculture's (WDA) scoping comments pertaining to the revision of the Shoshone National Forest (SNF) Land and Resource Management Plan (forest plan) and associated Environmental Impact Statement (EIS).

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 forest plan and EIS 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 continue to provide the opportunity to express pertinent issues and concerns.

With management direction of approximately 2.4 million acres, this forest plan will undeniably affect grazing permittees, agriculture producers, landowners and other citizens, as well as our natural resources, over a large area of Wyoming. Officials need to consider these effects upon livestock grazing management in the EIS: direct, indirect, cumulative, economic, social, and environmental.

The WDA agrees there is a "need for change" and the forest plan revision is overdue. Conditions throughout the planning area have changed since the 1986 forest plan. In addition, monitoring information has been updated and there is more scientific information regarding management actions and their impacts. Peer-reviewed science should guide the decision making process. The EIS must identify the science supporting management decisions, discussions and actions regarding this forest plan.

Active collaboration between local cooperators, state cooperators and SNF officials is key to successful planning and preparation of the forest plan. We appreciate the many meetings SNF officials have had in past years and encourage a continuance of cooperating agency meetings. These meetings allow cooperators to discuss and have a shared knowledge of plan objectives, concerns, existing conditions, and desired conditions. They also help build a confidence in and support for the forest plan.

The revision topics outlined in the Notice of Intent are still relevant issues the SNF must address in the forest plan. As these revision topics are discussed and analyzed, the WDA recommends SNF officials consider the following points:

- The forest plan should allow SNF officials and grazing permittees the opportunity to work cooperatively and provide flexibility to make case-by-case decisions that are in the best interests

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of affected natural resources and area citizens. Planning criteria needs to include an objective that management decisions are complimentary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and decisions reflected in the forest plan will critically impact private landowners operations' and planned livestock grazing management.

- We encourage SNF officials to work with all grazing permittees and agriculture producers affected by the forest plan to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge which SNF officials should utilize to their full advantage. They are particularly aware of the impacts this forest plan will have on rangeland health, wildlife habitat and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands and can offer recommendations that are both environmentally and economically sound. Thus, we strongly recommend SNF officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring that grazing permittees who are directly affected by the forest plan receive all notices about this revision.
- Grazing on public lands represents a vital economic value to agricultural producers and local communities. SNF officials need to include impacts on this economic activity in the EIS. We urge SNF officials to use documents developed by the Department of Agricultural and Applied Economics (located in the University of Wyoming College of Agriculture) detailing the impact of policy upon agriculture throughout the state. 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 forest plan will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area. SNF officials must include these evaluations of economic impacts upon agriculture in the EIS.
- For several decades, SNF officials and grazing permittees have been working to improve rangeland health through the management of livestock grazing. The forest plan must adequately reflect these efforts. Range improvements, annual operating instructions, allotment management plans, monitoring and other livestock grazing tools have moved rangelands on the SNF in a positive direction. This direction has allowed livestock grazing management to be utilized and rangeland health to be improved. The EIS chapters on affected environment and environmental consequences should acknowledge these efforts and improvements.
- The effects of livestock grazing upon other uses is usually a focus in the forest plan, while the repercussions of other uses upon livestock grazing management, forage availability and grazing permittees are often overlooked. Planning must include the effects of each use and resource upon those of the others equally.
- Management prescriptions in the forest plan must reflect multiple use resource principles. Congressional mandates, federal statutes and implementing regulations call for multiple uses on SNF-administered lands. These should be an integral part of the forest plan. WDA particularly believes the SNF should specifically note the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing. FLPMA Sec. 102(8) states

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“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...” We have learned through experience in working on previous forest plan revisions that many in the public are unaware how critical this Congressional policy is to livestock grazing in the planning area.

In conclusion, we appreciate the opportunity to comment on the scope of revision of the SNF forest plan. We ask that the SNF consider and utilize previous comments made by the WDA in the revision process. We encourage continued attention to our concerns and look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

A handwritten signature in black ink that reads "Jason Fearneyhough". The signature is written in a cursive style and is positioned above the printed name and title.

Jason Fearneyhough  
Director

JF/jc

CC: Governor's Planning Office  
Guardians of the Range  
Rocky Mountain Farmer's Union  
Wyoming Association of Conservation Districts  
Wyoming Board of Agriculture  
Wyoming Farm Bureau Federation  
Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association