



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

August 25, 2009

M. Stephen Best, District Ranger
Brush Creek/Hayden Ranger District
Medicine Bow National Forest
P.O. Box 249
Saratoga, WY 82331

Dear Mr. Best:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Snowy Range Cattle #2 Rangeland Analysis Environmental Assessment (EA) to reauthorize livestock grazing on six allotments located on the west slope of the Snowy Range of the Medicine Bow National Forest (MBNF).

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 you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA does not support Alternative 1 – No Action (No Grazing) Alternative. This alternative would have significant negative impacts on the permittees and the ranching-based local economy as described on page 61 of the EA and on pages 3-629 through 3-630 of the MBNF Revised Land and Resource Management Plan of 2003 (Forest Management Plan). In addition, the current Forest Management Plan allows for grazing in each of the six allotments and has found each allotment to be suitable for commercial livestock grazing.

We support Alternative 2 – Proposed Action (Adaptive Management) Alternative. We understand the rationale to remove season long grazing in support of adaptive management on the six allotments. Adaptive management will provide flexibility in managing livestock grazing operations and decision making associated with the goal to maintain and improve rangeland conditions. This alternative allows the continuation of livestock grazing and improvements of the allotments through the development of additional water sources, removal of unnecessary fences and the addition of structural components where needed. Decisions must be made on a case-by-case basis and based on the science or data collected during monitoring.

The WDA wants language added to the Proposed Action recognizing other animals browse in riparian/wetland and upland areas, and that special attention will be given to determining what was actually livestock use versus deer, elk or moose use. Too often we see the demand for early livestock removal from a pasture or allotment due to willow utilization, without the consideration of all potential causes. In addition, we believe an appendix should be included to define the various monitoring methods to be used on the six allotments and encourage a discussion regarding the development of monitoring plans for each identified key area to eliminate potential confusion on how key areas will be monitored.

The WDA encourages the Forest Service recognize for all Alternative 1 - No Action discussions, that the removal of livestock grazing from the land will not create all positive effects. Removing livestock grazing

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can increase litter which decreases light filtration and decreases seed germination, which has the potential to decrease plant diversity and species richness (Manier and Hobbs 2007¹).

Following are the WDA's specific comments to the EA:

Geographic Area Direction (Page 13, Entire Section).

We understand the Forest Management Plan's direction is to move toward or maintain the desired conditions for each of the geographic areas outlined. However, we strongly encourage a thorough discussion describing the effects the mountain pine beetle will have on these geographic areas and how it may affect desired conditions. It is plausible herbaceous vegetation could increase with the lack of canopy and in turn increase animal unit months in affected areas.

Proposed Action (Page 16, Paragraph 1, Sentence 4).

We recommend "monitoring indicates" should be replaced with the following: "*When long-term trend data acquired from monitoring indicates...*" this will ensure management decisions are not made based on a single sample, but over time based on the science/data collected during long-term monitoring. This should be included throughout the document where monitoring is referenced in this manner.

Alternatives – Proposed Action (Pages 18-19).

The Proposed Action goes into detail regarding what adaptive management is, and what it may mean to changes in current practices, but it does not go into enough detail on how adaptive management practices will be implemented. For example, the WDA believes there should be (at a minimum) annual meetings with the permittees to discuss the monitoring data from past years and any potential adaptive management changes identified for future years. It is very important the permittees understand the change from the current season-of-use to key area maximum allowable use level as proposed in Alternative 2, and we believe this communication should occur during an annual meeting prior to grazing "let on date".

Monitoring (Page 26).

We support expanding monitoring practices in the six allotments to determine rangeland conditions, while having long-term trend data aide in the decision making process for changes to livestock grazing management. We strongly promote the use of joint cooperative monitoring with permittees for all monitoring efforts.

Comparison of Alternatives (Page 32, Table 4).

Neither the Comparison of Alternatives table or the EA discusses how livestock grazing is utilized as a management tool for accomplishing long-term rangeland health. The table and the EA should include a discussion of the importance of using livestock to improve elk forage (Anderson and Scherzinger 1975²), bird habitat (Derner et al. 2009³), and other natural resource objectives (Davies et al 1990⁴, Severson

¹ Manier, D. J. and N. T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: Livestock and wild ungulates influence structure and function. *Oecologia*. 152:739-750.

² Anderson, E. W. and R. J. Scherzinger. 1975. Improving quality of winter forage for elk by cattle grazing. *Journal of Range Management*. 28:120-125.

³ Derner, J. D., W. K. Lauenroth, P. Stapp, and D. J. Augustine. 2009. Livestock as ecosystem engineers for grassland bird habitat in the Western Great Plains of North America. *Rangeland Ecology and Management*. 62:111-118.

⁴ Davies, K. W., T. J. Svejcar, and J. D. Bates. 2009. Interaction of historical and non-historical disturbances maintains native plant communities. *Ecological Applications*. 19:1536-1545.

1990⁵). The EA should also include a discussion on how livestock grazing can decrease excessive litter accumulation and thus increase plant diversity and species richness (Manier and Hobbs 2007⁶).

Proposed Action (Page 35, Paragraph 2, Sentence 1).

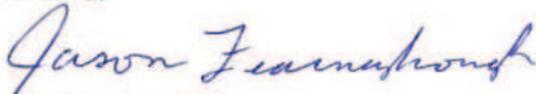
The paragraph starts with "Livestock grazing would continue to affect riparian/wetland habitats in the analysis area..." This section must recognize there are many other resources, such as dispersed camping, wildlife, etc, which may also impact riparian habitats. This section only identifies livestock grazing as impacting riparian areas. The WDA would recommend a more general statement: "*Riparian/wetland habitats would continue to be impacted by various activities in the analysis area...*"

Riparian Areas (Page 51, Paragraph 3, Sentence 3).

"In some areas, willows are heavily browsed, but much of this use appears to be from deer, elk, and/or moose,..." The WDA appreciates the effort to show livestock are not the only ungulates using these areas to forage and that wildlife does impact riparian habitats.

We strongly support the continuance of commercial livestock grazing within the Snowy Range Cattle #2 Analysis area. We appreciate the opportunity to comment on the EA. 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 Fearneshough
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
Rocky Mountain Farmers Union

⁵ Severson, K. E. 1990. Summary: Livestock grazing as a wildlife management tool. *In*: Can livestock be used as a tool to enhance wildlife habitat. General Technical Report. RM-194 p. 3-6. U. S. Forest Service, Rocky Mountain Experiment Station, Fort Collins, CO.

⁶ Manier, D. J. and N. T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: Livestock and wild ungulates influence structure and function. *Oecologia*. 152:739-750.