



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

July 27, 2010

Patricia Claybaugh, District Ranger
Pinedale Ranger District
Bridger - Teton National Forest
29 East Fremont Lake Road
Pinedale, WY 82941

Dear Ms. Patricia Claybaugh:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Draft Supplemental Environmental Impact Statement (SEIS) for the Upper Green River Area Rangeland Project located in the Pinedale Ranger District of the Bridger – Teton National Forest (BTNF).

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

Alternative A – Grazing as Currently Permitted (Current Management)

The WDA supports the continuation of the existing grazing management, with the exception of changing those allotments not participating in a rotational grazing system. We support the use of a rotational grazing system to assist in achieving rangeland health. This would allow all the allotments in the project area to be in compliance with the current Forest Plan.

We urge the BTNF consider this change prior to implementing any adaptive management plans to address specific resource needs.

Alternative B – Modified Grazing Management Alternative (Preferred Alternative)

The WDA supports the concept of Adaptive Management; however, we believe adaptive management should be based on sound science and long-term monitoring data. Page 29 mentions, "...design criteria fail to result in a trend toward desired conditions on key areas, it is likely that something other than livestock grazing is causing the effect..." This is not how adaptive management should work. BTNF staff should first identify the resource issue, then identify the causal factor, make management changes, monitor new management over time, develop trend data, and then adaptively change management based on the data. The statement above makes the assumption livestock grazing is the only causal factor. The WDA recommends the BTNF identify all potential causal factors first and include all activities impacting the desired condition. BTNF must manage equally and not automatically use livestock grazing for mitigating all other possible causal factors.

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 BOARD MEMBERS

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

The WDA does not support any reductions in allowable use when an objective is not being met. Once again, all factors must be considered prior to any change. Just because an objective is not met (once) should an automatic change in management occur. Circumstances such as drought, insects, wildlife etc. may cause resource damages which should not automatically trigger a reduction in livestock use. We recommend additional language to ensure livestock reductions do not arbitrarily occur just because an objective is not met. It is absolutely necessary to determine all causal factors before utilizing adaptive management.

We are providing a list of potential adaptive management tools used on the Black Hills National Forest for your review and development of adaptive management tools and process that can be used in this document (See Attachment). Adaptive management tools should be developed and shared with the permittees, and not just use a reduction in allowable use as your only tool in achieving an objective.

Alternative C – No Livestock Grazing

The WDA strongly opposes the “No Livestock Grazing Alternative” (Alternative C). Livestock grazing has already been analyzed and is deemed an approved activity in the existing BTNF Management Plan (BTNF Plan). By having livestock grazing as an authorized activity the BTNF accepts there will be minor impacts to resources. Additionally, the BTNF Plan maintains a goal to provide forage Forest-wide for approximately 260,000 Animal Unit Months (AUMs) of livestock grazing annually. This alternative would directly conflict with the BTNF Plan goal by eliminating 46,000 AUMs from permitted grazing.

The EIS is supposed to state all the effects the Alternative will have on the social and physical environment (positive and negative), however Alternative C only discusses what is deemed by the BTNF staff as positive effects of removing livestock grazing from the project area. The WDA insists the BTNF include in the SEIS all the negative effects livestock grazing removal will have on the environment. For example: removing livestock grazing increases litter over time which decreases light filtration and decreases seed germination, which has the potential to decrease plant diversity and species richness (Manier and Hobbs 2007¹). Also, removing livestock grazing increases fuel loads, creating a high chance of wildfires (Brown 2002²). These examples are just a few of the many negative effects the removing of livestock will have on rangeland health, and we would be more than happy to assist in identifying additional examples if needed.

Monitoring

The WDA recommends BTNF staff work closely with the permittees and cooperatively identify all key areas for monitoring. Permittees are the most familiar and knowledgeable individuals regarding the lands their livestock graze. WDA urges local knowledge is applied in identifying key areas and setting up monitoring locations.

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 Brown, Travis, 2002. Minimizing wildfire risk with grazing. *Rangelands*. 24:17-18.

The WDA appreciates the BTNF recognizing the value of joint cooperative monitoring with permittees and including this in the EIS.

Socio-Economic Analysis

The WDA appreciates the effort to state the importance of grazing has on the local economies. The concern is pointed out extremely well with the following statement: "Sublette County is ranked 13th among 263 counties in seven western states in the Rocky Mountain region in terms of potential for conversion of prime rangeland to residential development (Taylor 2003³). Even with this said, the WDA does not believe BTNF staff went far enough with the economic analysis. An Economic Profile of the Bridger-Teton National Forest (Taylor et.al. 2008⁴) was prepared for the revision of the BTNF Management Plan, and includes in-depth analysis of livestock grazing on the entire BTNF. The data collected shows livestock grazing on the BTNF resulted in \$7.9 million to \$24 million in production. This production supports approximately 187 to 576 jobs and generates \$5.1 to \$5.6 million in labor earnings.

In addition, the Economic Profile (mentioned above) shows the value in production of an AUM has on the permittee, ranch viability and impacts to the local economies. Any reduction in AUMs considered must reference this economic analysis. The EIS must also recognize any reduction or elimination of AUMs may hinder the permittees from attaining bank loans for their operation as bank loans are often tied to the number of permitted AUMs.

The WDA urges the BTNF recognize the long-term cumulative effects of the proposed actions on ranches. If a ranch fails, the ranch likely would sell and potentially be sub-divided. Wildlife habitat would be lost or have habitat permanently fragmented. The view-shed would change drastically with open space lost permanently. The WDA insists on this degree of consideration when analyzing socio-economics of the No Grazing Alternative.

General Comments

- The SEIS states there are areas of the 169,000-acre project area not meeting resource objectives but fails to provide data on how much of the project area is not meeting objectives. The SEIS should state how many acres are not meeting objectives, what percentage of the entire project area is not meeting objectives and where these areas are located. This would create a scale and perspective on the areas not meeting objective. In addition, page 15 of Chapter 1 states; "Monitoring conducted in the project area indicates that current grazing use is meeting resource management objectives in most case." If this is true, changes in management should only be minor and only applied to those few localized areas not meeting the objectives.
- Page 28 indicates there are 27-critical areas needing special management consideration in order to meet desired conditions. However, a later sentence points out the causal factors preventing the critical area from meeting desired conditions is "difficult or impossible to

³ Taylor, David T. 2003. The Role of agriculture in maintaining open spaces in Wyoming. September 2003 issue of Wyoming Open Spaces. www.uwyo.edu/openspaces

⁴ Taylor et.al. 2008. An economic profile of the Bridger-Teton National Forest. University of Wyoming Department of Agriculture and Applied Economics.

quantify the role that each causative factor plays in retarding attainment of future desired conditions.” If this is the case, then livestock grazing should not be the only mitigation factor or management change proposed for these 27-identified critical areas. The WDA recommends BTNF include additional monitoring and evaluation tools occur to determine the exact causal factors (i.e. recreation, weeds, wildlife, fire, livestock grazing management...) and then develop proper management strategies addressing the specific causal factors. WDA strongly urges BTNF to not fall into the political and special interest group’s trap of using livestock grazing as the escape goat and only mitigation measure for all areas on the BTNF not meeting resource objectives.

It is imperative to remember livestock grazing is an approved activity in the BTNF Plan. BTNF must base decisions on any of the Alternatives be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify per reviewed science supporting the decisions and discussions and base them on long-term monitoring data and not on single incidents, isolated situations, or political whims.

We strongly support the continuance of commercial livestock grazing in the Upper Green River Area. We appreciate the opportunity to comment on the scope of the proposed action. 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

Attachment: Adaptive Management Tools – Black Hills National Forest

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