



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

January 7, 2010

Joe Harper, Acting District Ranger  
Pinedale Ranger District  
Bridger - Teton National Forest  
P.O. Box 220  
Pinedale, WY 82941

Dear Mr. Harper:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to supplement the 2004 Environmental Impact Statement (EIS) to analyze domestic livestock grazing in the Upper Green River Area.

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

The WDA is concerned with the current process of supplementing the EIS and want to ensure we are included throughout the document development and decision-making process. It is not clear if the WDA participated fully on the preparation of the original EIS in 2004. Please accept this letter as our desire to participate in the entire EIS process, from scoping, alternative development, affected environment, draft and final review, including the opportunity to appeal the final decision.

The Proposed Action (Alternative B) proposes to authorize grazing under a specific management regime, designed to sustain or improve the overall ecological condition of the project area. The WDA strongly encourages decisions and development of Allotment Management Plans be based on sound science and area specific (long-term) monitoring data. In addition, any management prescriptions must reflect multiple use resource principles, as described in Federal Land Policy and Management Act of 1976 (FLPMA) Sec. 102(8) stating "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..."

The WDA does not support the "No Grazing by Domestic Livestock Alternative" (Alternative C) in the environmental document. Livestock grazing has already been analyzed and is an approved action in the Forest Management Plan. Removing livestock grazing can increase litter

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which decreases light filtration and decreases seed germination, which has the potential to decrease plant diversity and species richness (Manier and Hobbs 2007<sup>1</sup>). Reductions, limitations or actions prohibiting livestock grazing in the project area shall be considered an adverse impact and analyzed as such.

The WDA insists a full social and economic analysis occur for the No Grazing by Domestic Livestock Alternative. Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The Pinedale Ranger District needs to include impacts on this economic activity in the analysis. We urge Pinedale Ranger District officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of Agriculture, who conducted several studies showing how federal policies impact agriculture throughout the state. The 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 proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock (Anderson and Scherzinger 1975<sup>2</sup>, Derner et al. 2009<sup>3</sup>), and other natural resource objectives (Davies et al 1990<sup>4</sup>, Severson 1990<sup>5</sup>) set forth in the Forest Management Plan. The EIS 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 2007<sup>1</sup>).

It is imperative to remember that livestock grazing is an approved activity in the Forest Management Plan. The Pinedale Ranger District decisions made in all the Alternatives should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions and be based on long-term monitoring data and not based on single incidents, isolated situations, or political whims.

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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.

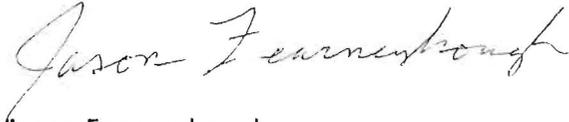
<sup>4</sup> Davies, K. W., T. J. Svejcar, and J. D. Bates. 2009. Interaction of historical and non-historical disturbances maintains native plant communities. *Ecological Applications*. 19:1536-1545.

<sup>5</sup> 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.*

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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

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  
State Grazing Board  
Wyoming Association of Conservation Districts