



Wyoming  
DEPARTMENT OF Agriculture

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

July 14, 2011

Dale Deiter, District Ranger  
Jackson Ranger District  
Bridger - Teton National Forest  
25 Rosencrans Lane  
P.O. Box 1689  
Jackson, WY 83001

Dear Mr. Deiter:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bridger-Teton National Forest Service's (BTNFS) "recommendation" to close the Willow Creek grazing allotment (Allotment) from domestic livestock grazing in preference for allocating the forage capacity within the allotment to recreational and outfitting use.

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 proposal affects our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA does not support the proposed recommendation to permanently close the Allotment to livestock grazing in favor of recreational and outfitting uses. The Forest Service under the National Forest Management Act (1976) and the Multiple-use Sustained-yield Act (1960) is directed to manage forest lands for multiple uses, which consist of timber, range, water, recreation, and wildlife. In addition, the Bridger-Teton Land and Resource Management Plan (Management Plan) (1990) states the BTNFS will manage for multiple uses and provide management direction towards Desired Future Conditions (DFCs). The DFCs for this allotment are 2A, 10 and 12, which all state under the Range Prescriptions: "Range is managed to maintain and enhance range and watershed conditions while providing forage for livestock and wildlife." BTNFS's recommendation for the Allotment is in direct conflict with these laws and the Management Plan.

We fully support the Allotment being available to livestock grazing either as full use, maintained as a vacant allotment or maintained as a forage reserve. The scoping letter states the allotment is marginally suited for maintaining long-term sustained grazing, which indicates livestock grazing is viable under proper management and terms.

The main reason the BTNFS stated they are not supporting ongoing livestock grazing on the Allotment is the lack of staff resources and capitol to maintain the Allotment. The WDA sympathizes with the BTNFS, but we do not support them taking the "easy-way-out," at the expense of the ranching industry by not managing for multiple use, including livestock grazing, and recreation. Additionally, outfitting could be allowed on the allotment. We are strongly opposed to closing any allotment, let alone this Allotment based simply on internal

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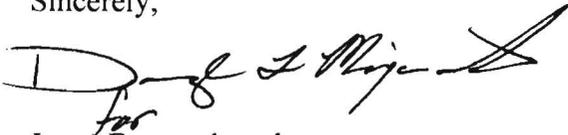
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staffing issues or on political whims of special interest groups. We encourage the BTNFS to base its decisions on science and site specific monitoring data.

The permanent closure of the Allotment to livestock grazing eliminates the BTNFS' ability to adaptively manage the entire landscape utilizing livestock grazing as a management tool to achieve DFCs or objectives and would further reduce the Animal Unit Months (AUMs) in the Forest. The WDA does not support any reductions in AUMs.

The WDA is in total disagreement with the recommendation. However, we are extremely interested in the global discussion with the BTNFS regarding maintaining currently used allotments, vacant allotments, and the management of forage reserves. We appreciate the opportunity to comment on the scope of the recommended 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,

A handwritten signature in black ink, appearing to read "Jason Fearneyhough". The signature is written in a cursive style with a large initial "J" and "F".

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