Wyoming
Department of Agriculture

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March 10, 2006

Bureau of Land Management
Pinedale Field Office
Mr. Curtis R. Yanish
Wyoming Front Aspen Health Treatment EA
P.O. Box 768
Pinedale, WY 82941-0768

To Mr. Yanish:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the proposed Wyoming Front Aspen Health Treatment Environmental Assessment (EA).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the treatment of aspen stands has major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, it is important that the WDA remain involved in all actions and decisions affecting the agriculture industry and that we have the opportunity to express pertinent issues and concerns.

The WDA supports the mechanical removal of conifers from aspen stands to improve ecological conditions. However, in the event that fencing of regenerated aspen stands may cause (1) a significant reduction in available forage for livestock; (2) the removal of available water for livestock; and for (3) an increase in fence maintenance costs for the permittee, the WDA is not in support of the Wyoming Front Aspen Health Treatment EA. We strongly encourage the Pinedale Field Office of the Bureau of Land Management (BLM) to address the following issues raised by the WDA.

Livestock Exclusion Fencing and AUM Reduction

As mentioned on page 6 of the EA, "*Fencing can be used to exclude all ungulates, including livestock, from the treatment area for approximately 2 to 10 years until aspen reach a height where browsing would be minimal.*"

The WDA is concerned the cost and labor for fence maintenance will fall on the livestock permittee. Livestock permittees want to maintain fences on their allotment to ensure a sustainable grazing pattern. This maintenance is currently a cost to their livestock business, and additional costs are not welcome.

Using fencing to protect aspen regeneration removes available water for livestock, thus altering the grazing pattern in many allotments. Removing available water for livestock can create an undesired grazing impact within the allotment. We recommend the BLM explore the development of alternative water sources in allotments where aspen stand fencing is utilized.

Ultimately, fencing aspen stands lowers the available forage in a livestock allotment. Are the AUMs per allotment going to be reduced? Are the livestock permittees responsible for any resource damage that occurs within an allotment, which may be caused by other ungulates?

Cooperation with Livestock Permittees

We ask the BLM to continue working with all livestock grazing permittees who may potentially be adversely affected by these projects. We suggest conversations and inclusion in the project remain forefront to ensure the recovery of the treatment area, while not negatively impacting the economic viability of the grazing permittee. On-the-ground cooperation with the grazing permittee to identify smaller project areas and share resource knowledge will contribute to the success of aspen regeneration. We request the duration of time needed after treatment be evaluated on a case by case basis in cooperation with the grazing permittees, rather than adhering to a predetermined nationwide policy.

Additional Agency and Landowner Participation

As mentioned on page 1, "*The project boundary is approximately 243,800 acres, of which 600 are Forest Service, 12,000 are State Lands, 57,300 are Private, and 173,900 BLM.*"

Why are the U.S. Forest Service and the Office of State Lands and Investments not listed as partners on this project? It is logical to think that collaborating with these agencies to improve aspen stand conditions would benefit more ecological resources and save more financial resources. Many of the private landowners had not heard of this project prior to the release of the EA. On projects of this scale, we would anticipate a scoping procedure to solicit comments, prior to a release of an EA. Scoping would allow you to gauge the level of participation from the permittees and landowners, as well as have an additional opportunity to hear their concerns. A project of this scale should require more input for the affected parties.

Multidisciplinary Site-specific Review Team

The WDA is interested in inclusion within the multidisciplinary site-specific review team to evaluate the treatment needs of aspen communities. Post-treatment management will include livestock exclusion; therefore, it is important to keep livestock grazing in mind when selecting aspen stand regeneration projects. We offer our expertise and services to your disposal. Please continue to include the WDA as an interested party in this analysis. Send all future information to:

Wyoming Department of Agriculture
Natural Resource Section
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Economic Impact to Agriculture

The inventory value of livestock in Sublette County alone exceeds $35,580,000 per year (NASS-USDA, 2003). Any negative impact or alteration to the livestock industry can lead to a significant decrease to the value of agriculture. In neighboring Fremont County, a 100 percent reduction in BLM grazing estimates to reduce the average annual net income for the model ranch to -$59,848. Any business activity with an average net income of -$59,848 is not economically viable. Even a 24 or 52 percent reduction in profitability might financially stress many livestock operations (Taylor, Coupal, Foulke and Thompson, 2004).

Overall firm-level economic impacts of reducing BLM forage on a representative ranch operation can be quite significant depending upon the quantity of BLM forage made unavailable. An important aspect of ranching in the Rocky Mountain area is that summer grazing on public lands has no viable substitute during that season. Therefore reducing public lands grazing makes other forage sources less available because of conflicting seasonal uses. Private meadows are hayed for winter feed and cannot be used as a summer grazing alternative. As BLM forage resources are removed from consideration, the operation becomes more of a hay selling enterprise. However, since this is clearly a less profitable alternative, the pressure to sell out and remove the private lands from ranching altogether increases (Taylor, Coupal, Foulke and Thompson, 2004).

Wyoming ranchers and their private ranch land rely on federal grazing for social and economic productivity. The ability for ranchers to graze federal lands is critical for their operation to remain economically viable. The loss of ranchlands is a very crucial issue, as the impacts of subdividing private ranch land in the surrounding area will have an extreme-demonstrative effect on the wildlife populations, their prey base, and available open space and habitat. This subdivision of private ranchland is far worse on the ecosystem, especially when compared to the minuscule utilization

of forage by livestock in an allotment. If grazing permits are permanently removed, the BLM can count on the eventual removal of habitat on the private ranchland.

Agricultural land is being converted into rural residences at an unprecedented rate in the Inter-mountain West. Survey data have been collected for Sublette County, Wyoming concerning preferences for private land use and land use controls (McLeod, Woirhaye, Kruse and Menkhaus, 1998).

Because agriculture is the dominant private land use in Wyoming, the future of open spaces on such land in the state will depend to a large extent on what happens to agriculture. A number of factors adversely affect the retention of agricultural land in Wyoming. One factor is the continued uncertainty about livestock grazing on federal lands (Taylor, 2003).

Sublette County, Wyoming policy encourages conservation of agricultural and ranch lands and related land uses through various voluntary and incentive-based programs and policies (Sublette County Comprehensive Plan, 2003).

As an impact from alternative uses and ecological improvements on federal land is imminent, ensure that the efforts of the BLM will not have a significant adverse financial impact on ranching, and, therefore a potentially devastating impact on wildlife and the natural resource base.

Thank you for the opportunity to comment.

Sincerely,

John Etchepare

JE/mh

CC: Governor's Planning Office
Wyoming Farm Bureau Federation
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Game and Fish Department
Wyoming Board of Agriculture