



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

October 2, 2014

Mark Booth, District Ranger  
United States Forest Service  
Powder River Ranger District  
1415 Fort Street  
Buffalo, Wyoming 82834

Dear Mr. Booth:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the United States Forest Service, Powder River Ranger District (FS) proposed Billy Creek Timber Sale Project.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

We support continuous active management of forests to promote healthy stands of diverse age classes and species for the persistence of healthier, more robust tree populations. We also support thinning forests to allow growth release of remaining trees and avoid potentially catastrophic wildfires. The FS should prioritize treatments in areas where aspen recruitment is likely and where fire concerns are greatest.

The FS identified "areas of initial concern" including many potential impacts to grazing permittees. We appreciate the attention and offer the following comments.

First, "impacts of removing natural barriers (timber stands) to livestock movement" can be misconstrued. It is our contention that removal of physical barriers may not only increase the amount of available forage in the long-run but also change use patterns in a beneficial way. We assume these allotments have been relatively constant in grazing patterns, movement corridors, number of animals, animal unit months (AUMs) and season(s) of use. We urge the FS to consider the positive impacts that may be realized from changing the movement of grazing animals through these allotments. We also insist the FS work closely with the permittees to form strategies to compensate for changes that may occur. This may include changing seasons of use, changes in pasture design, or any existing rotational grazing strategies to accommodate changes in forage and animal behavior. An adaptive management approach should be taken whenever possible to facilitate needed changes.

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Second, "*new infestations of noxious weeds through soil disturbance and equipment*" should not include any references to livestock grazing. We have found this to be problematic in other environmental documents and insist there be no analysis of weeds or weedy plants in the livestock grazing section of the document. Analysis of weed dispersal by livestock is beyond the scope of this project and the document should only address impacts from timber harvesting activities.

In conclusion, we support the proposed timber sale and thank you for the opportunity to comment. We look forward to reviewing the future document.

Sincerely,



Jason Fearneyhough  
Director

JF/jb

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association