



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

March 7, 2014

Mr. Rob Robertson, NEPA Coordinator
Shoshone National Forest
Washakie Ranger District
333 East Main Street
Lander, WY 82520

Dear Mr. Robertson:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the United States Forest Service (FS) Shoshone National Forest's (SNF) proposed Environmental Assessment (EA) for the Adaptive Management (AM) process concerning Livestock Grazing Management on the Meeteetse Creek, Pickett Creek, Sage Creek, Piney Creek, Bear Creek, Wiggins Fork, Warm Springs and Wind River allotments.

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.

The WDA supports the continuation of livestock grazing on FS lands and the incorporation of adaptive management to meet Forest Plan direction. This allows SNF personnel the flexibility to change livestock grazing management in a timely and efficient manner to meet established goals and objectives. We also support the use and development of range improvements to benefit livestock and wildlife in the area and improve forage utilization patterns.

We ask the FS consider the following:

- Include larger "windows" for grazing to occur within as changes in season of use are discussed. Expanding the season of use on allotments allows flexibility throughout the grazing season and during years of drought.
- Determine whether removal or relocation of livestock is an appropriate solution to bear/livestock conflicts and reference the Wyoming Game and Fish Grizzly Bear Management Plan which states when, how and why bears in conflict with livestock will be dealt with.
- Remove "range readiness" from the document. Range readiness is outdated, inappropriate and no longer is required to fill the role it was designed for (Perryman et al, 2005¹). We strongly oppose any use of range readiness criteria.
- Develop vegetative objectives, based on peer-reviewed science, to determine when an area is ready for the reintroduction of livestock grazing post-fire. The WDA does not support a

¹ Perryman, B.L., Laycock, W. A., Bruce, L. B., Crane, K. K., Burkhardt, J. W. 2005. Range Readiness Is an Obsolete Management Tool. *Rangelands*, Vol. 27, No. 2, pp. 36-41

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mandatory two year rest of areas following fire. Length of rest following fire should be determined on a site-by-site basis (Bruce et al, 2007²).

- Dismiss any considerations of removing livestock, reducing Animal Unit Months (AUMs) or dramatically changing season of use (Table 2) since all eight allotments are currently meeting or moving towards standards under current management.
- Continue to work closely with permittees and realize implications to herd management when exploring changes to infrastructure(s) on the affected allotments, including changes based on AM recommendations.

In conclusion, we support many of the proposed changes to grazing management outlined in Table 2 as they could potentially benefit permittees and managers. We commend the FS for their continued cooperation with the permittees. We thank you again for the opportunity to comment and look forward to reviewing the future EA.

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

² Bruce, L. B., Perryman, B., Conley, K., McAdoo, K. 2007. Case Study: Grazing Management on Seeded and Unseeded Post-Fire Public Rangelands. The Professional Animal Scientist, Vol. 23, No. 3, pp. 285-290