



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

April 18, 2014

John Moore
Pinedale Ranger District
PO Box 220
Pinedale, WY 82941

Dear Mr. Moore,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Pinedale Ranger District of the Bridger Teton National Forest (PRD) scoping notice to reauthorize livestock grazing on the Sweetwater, Blucher Creek, and East Squaw Creek Allotments.

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 this proposal impacts 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, including appeals and objections, and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA supports the continuation of livestock grazing by incorporating adaptive management on all allotments to meet Forest Plan Direction. This allows PRD personnel the flexibility to change livestock grazing management in a timely manner to maintain and improve rangeland conditions. In addition, we encourage discussing the importance of using livestock as a tool to achieve natural resource objectives, such as improving wildlife habitat (Anderson and Scherzinger 1975¹, Derner et al. 2009², Severson 1990³). Furthermore, we support the use and development of range improvement projects to achieve healthy rangelands for the benefit of livestock and wildlife.

The WDA does not support a "no grazing" alternative. Selection of such an alternative would have negative and significant consequences on vegetative resources, wildlife habitat, and the local

¹ 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.

² 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 Plain of North America. *Rangeland Ecology and Management*. 62:111-118.

³ 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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economy. In addition, the 1990 Bridger-Teton Land and Resource Management Plan established goals and objectives ensuring the continuance of livestock grazing.

We urge the PRD provide management prescriptions in the analysis to reflect multiple use principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on Forest Service-administered lands. WDA particularly insists PRD reference the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing. FLPMA Sec. 102(8) states "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..." Many in the public are unaware of this Congressional policy, yet this policy is critical to the continuance of livestock grazing on public lands and should be expressed in this assessment.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. PRD must include a full economic analysis of these impacts. In addition to the economic contribution, livestock grazing also provides irreplaceable environmental and social values. These values provide wildlife habitat, open spaces, rangeland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. PRD should include the losses of these essential environmental, historic, and social values of livestock grazing to users and visitors to the area and residents of impacted communities.

The WDA strongly encourages PRD staff to use joint cooperative monitoring to determine if and when changes to livestock grazing management are needed. We also believe it is vital for PRD to work closely and consistently with all affected grazing permittees regarding Forest Plan direction at the local and landscape level. Agriculture producers are intimately familiar with areas affected by the analysis and possess irreplaceable long-term, on-the-ground knowledge. We highly recommend PRD officials seek and address the concerns and recommendations of these producers. Moreover, it is imperative the PRD officials continuously inform all livestock grazing permittees who are directly or indirectly affected by this analysis, including issues, decisions, appeals, objections, and resulting action regarding their permits.

The analysis should include the flexibility for PRD staff to cooperatively make the best site-specific, cases-by-case decisions with the best interests of affected resources and citizens. Specifically, this analysis should include an alternative to increase the permitted Animal Unit Months (AUMs). We understand utilization levels on these particular allotments are well below the allowable levels and are meeting current standards and desired conditions.

Sweetwater, Blucher Creek, East Squaw Creek Allotments

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In conclusion, the WDA supports the continuance of commercial livestock grazing on Sweetwater, Blucher Creek, and East Squaw Creek Allotments. We appreciate the opportunity to provide scoping comments for these allotments. We encourage continued attention to our concerns and specifically request the PRD communicate with and include the WDA throughout the development of the analysis. We look forward to working closely with PRD throughout this process.

Sincerely,

A handwritten signature in blue ink that reads "Jason Fearneyhough". The signature is written in a cursive, flowing style.

Jason Fearneyhough
Director

JF/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
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