



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.

May 28, 2014

Bureau of Land Management
Kemmerer Field Office
c/o Levi Bennington
312 Hwy 189 North
Kemmerer, WY 83101

Dear Mr. Bennington,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Kemmerer Bureau of Land Management Field Office's (KFO) scoping notice to prepare a new Allotment Management Plan (AMP) and issue new term grazing permits to livestock producers on the Smithsfork Allotment.

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 and continue to provide us the opportunity to express pertinent issues and concerns.

WDA appreciates the concerted effort and devotion to work with Smithsfork Allotment grazing permittees and interested public. KFO has worked diligently to inventory and monitor water, vegetation, soils, wildlife habitat, as well as historic and current livestock use areas. We support the proposed action to develop a new AMP and renew the grazing permits. We offer the following comments for KFO to consider when developing the AMP and range of alternatives:

The 2005 AMP may have had a number of issues related to actual implementation, but we believe it provides a good starting point, as many of the permittee's concerns likely remain, including the lack of range improvements for water developments, fences, and vegetation manipulation. Additional concerns listed, which also remain, include Bonneville Cutthroat Trout, recreational use, and willow populations sprayed in the late 1960's and early 1970's. KFO should continue working cooperatively with the landowners in the Coordinated Resource Management group and use the 2005 AMP to develop the new AMP, inclusive of adaptive management to address unforeseen circumstances and changes.

The scoping notice, page 2, includes internal scoping comments pertaining to the development of a new AMP and permit renewal. While some of these points are simply ideas to consider, we do have some concerns. For example, point number one states: "How will the proposed action affect the current rangeland health standards? Current practices of livestock management are not sufficient for meeting standards of rangeland health." KFO should not convey a broad statement implying standards are not being met, when the assessment is still incomplete. WDA supports the inclusion of all data; including the 2013 data collected using the 17 Indicators of Rangeland Health.

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WDA urges KFO implement the necessary long-term transects using appropriate Ecological Site Descriptions in each pasture, throughout the entire allotment. Specifically KFO needs to collect additional data for soils, upland vegetation, and wildlife habitat. Following the 2014 grazing season and monitoring season, KFO and the designated ID Team can then determine if current livestock management practices are the reason standards for rangeland health are not being met on the allotment. The AMP will address changes to livestock grazing management if standards are not met and livestock grazing is determined the causal factor.

Riparian areas on the allotment historically and currently are over utilized in certain areas due to lack of alternative stock water. The 2005 AMP clearly indicates water development as a top priority to properly distribute livestock in a timely manner. The 2013 Technical Review Team also recommended developing water to reduce grazing use of riparian areas. KFO must incorporate and analyze numerous upland/offsite water developments to addresses riparian standards. KFO historic photo points show considerable progress throughout the allotment on riparian areas as of 2013. WDA urges KFO utilize these photos when renewing the permit.

WDA remains unclear what KFO's original goals and objectives for establishing each of the numerous exclosures found throughout the Smithsfork. We understand some of the exclosures were to improve trout habitat, reduce streambank erosion, or improve riparian vegetation. We ask KFO to divulge the original goals and objectives for establishing the exclosures, followed by analyzing the data to determine if the goals and objectives were met. Vegetation in some of the exclosures would benefit light utilization by livestock to remove decadent grasses and create opportunities for willow establishment. WDA would strongly support KFO establishing gates at each end of the exclosures to allow for utilization at designated times.

We also urge KFO review the original Environmental Assessments for each exclosure. The exclosures may have benefited the designated areas, but the analysis likely did not include the unforeseen bottleneck it created for livestock accessing water on either end of the exclosure. Livestock are now deemed the causal factor for riparian areas not meeting standards in and around the exclosures. We ask KFO to address the exclosures and issues they create in the Smithsfork analysis.

The lack of disturbance, including fire, continues to influence seral stages of sagebrush, aspen, and small shrub stands. This has also led to conifer encroachment throughout the allotment. WDA requests KFO develop and analyze site-specific locations to incorporate biological, chemical, and/or mechanical treatments to address current vegetation conditions to benefit ecological health, wildlife habitat, and forage for livestock. WDA would also encourage adaptive management and flexibility to address deferment and/or rest on a case-by-case basis.

KFO must address Bonneville Cutthroat Trout (BCT) habitat on the Smithsfork. Similar to the exclosure, we understand, little to no data was collected, is current, or is readily available to actually determine if any changes to current management are in fact necessary. WDA believes KFO should not continue to implement projects or change grazing management practices to address BCT until such data is collected, analyzed, and shared.

Livestock are routinely deemed the causal factor on riparian areas and the demise for BCT on Smithsfork Allotment. However, recreation users have and continue to have impacts to the riparian areas. WDA supports KFO analyzing recreational use on the Smithsfork Allotment.

WDA understands the upcoming permit renewal and new AMP will eliminate all past regulatory actions, including the settlement agreement and eliminating livestock grazing in Raymond Canyon. We ask KFO reinstate the area for use in the new permit and AMP. The agreement permittees made was voluntary and temporary. Livestock grazing in Raymond Canyon should be strategic, properly managed, and adaptable.

Overall, WDA is pleased with the recent progress KFO has accomplished on the Smithsfork Allotment, including improved riparian conditions and vastly improved communication and working relationships with livestock grazing permittees. We ask this continue, as well as KFO addressing the aforementioned concerns. The implementation of range improvement projects and vegetation treatments are vital to changing the stalemate we all are diligently trying to address.

We appreciate the opportunity to comment and wish to stay actively involved throughout the development of the AMP, range of alternatives for this project, and notified of any petition and/or appeals. If you have any questions, please contact us.

Sincerely,



Jason Fearneyhough
Director

JF/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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