



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

July 2, 2010

Shoshone National Forest, Wapiti Ranger District
Attn: Marty Sharp, NEPA Coordinator
203A Yellowstone Avenue
Cody, WY 82414

Dear Mr. Sharp:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Predecisional Environmental Assessment (EA) for Commercial Livestock Grazing Permit Issuance on five allotments on the Clarks Fork, Greybull, and the Washakie ranger districts of the Shoshone National Forest (SNF).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed EA affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA supports Alternative 2 (the Proposed Action) to continue to permit livestock grazing by incorporating adaptive management on all five allotments to meet Forest Plan direction. This alternative allows SNF personnel the flexibility to change livestock grazing management in a timely manner to maintain and improve rangeland conditions. Furthermore, we support the use and development of range improvement projects to achieve healthy rangelands for the benefit of livestock and wildlife.

We do not support Alternative 1 (No Grazing). This alternative would have negative consequences on vegetative resources, wildlife habitat, and socioeconomics, as outlined in Chapter 3 of the EA. In addition, it is clear under the current Forest Plan that analysis of a no grazing alternative is not necessary. The current Forest Plan allows for grazing in each of the five allotments and has found each allotment suitable for commercial livestock grazing.

Following are the WDA's specific comments to the Predecisional EA:

Monitoring and Monitoring Plan(s), page 25:

The WDA appreciates that SNF personnel will use monitoring to determine if and when changes to livestock grazing management are needed and we strongly encourage that joint cooperative monitoring continue.

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Effects to Rangelands – Alternative 2, Change Livestock Numbers/Stocking Rate, page 44:

Table 2.1 (page 20) does not address the option to eliminate grazing as part of adaptive management. Discussion items on page 44 and the table must address the same adaptive management options. The WDA supports the options of rest and non-use that are presented in Table 2.1 over eliminating grazing from the allotments.

Page 44 also discusses recommended riparian area stubble heights at the end of the growing season. The WDA recommends citing the research that addresses stubble height recommendations.

Environmental Consequences, Effects to Recreation-Alternative 2, page 102:

The WDA appreciates the discussion including effects of recreation *on* livestock and livestock grazing management.

In conclusion, the WDA supports the continuance of commercial livestock grazing in each of the five allotments. We appreciate the opportunity to comment on the proposed actions. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/jc

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