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.

February 26, 2010

Mr. Marty Sharp
203A Yellowstone Avenue
Cody, WY 82414

Dear Mr. Sharp:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to prepare an Environmental Assessment (EA) to continue commercial livestock grazing on five livestock grazing allotments on the Clarks Fork Ranger District, the Greybull Ranger District and the Washakie District 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 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 the opportunity to express pertinent issues and concerns.

The WDA supports the continuation of livestock grazing by incorporating adaptive management techniques on the allotments in order to meet Forest Plan direction. This allows SNF personnel the flexibility to change livestock grazing management in a timely manner to maintain and improve rangeland conditions. In addition, we encourage a discussion of the importance of using livestock as a tool to achieve natural resource objectives, such as improving wildlife habitat (Anderson and Scherzinger 1975[1], Derner et al. 2009[2], Severson 1990[3]). Furthermore, we support utilizing and developing range improvement projects to achieve healthy rangelands for the benefit of both livestock and wildlife.

The WDA does not support a no grazing alternative. Such an alternative would have negative and significant consequences on livestock grazing permittees, vegetative resources, wildlife habitat,

[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 Plains 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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and the local economy. In addition, it is clear under the current Forest Plan that analysis of a no grazing alternative is not necessary as grazing is an acceptable use.

Management prescriptions in the EA must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on Forest Service-administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing needs to be specifically noted. 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. Impacts on this economic activity need to be included in the EA. In addition to its economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West.

The WDA appreciates SNF personnel utilizing monitoring to determine if and when changes to livestock grazing management are needed and we strongly encourage joint cooperative monitoring continue. We recommend using the Wyoming Rangeland Monitoring Guide (2008) and specifically outlining monitoring schedules and methods for each of the allotments. It is particularly important that riparian area monitoring criteria be developed and methods for monitoring willow utilization be evaluated and clearly outlined.

We strongly encourage SNF staff to work closely and consistently with all affected grazing permittees. Agriculture producers are intimately familiar with areas affected by this EA and possess irreplaceable long-term, on-the-ground knowledge. We highly recommend SNF officials seek and address the concerns and recommendations of these producers. Moreover, it is imperative that SNF officials continuously inform all livestock grazing permittees who are directly or indirectly affected by this EA of the issues, decisions, and resulting actions regarding this proposal.

Decisions in the proposed plan should allow SNF officials, grazing permittees and private landowners the opportunity to work cooperatively. This EA should allow flexibility to make the best site-specific, case-by-case decisions in the best interests of the affected resources and citizens.

Peer-reviewed science should underlie decisions that are made. The EA needs to identify the science that supports the decisions and discussions regarding the continuation of livestock grazing on each of the allotments.

In conclusion, the WDA supports the continuance of commercial livestock grazing on the Little Rock, Sugarloaf, Washakie Needles, Bayer Mountain and Middle Fork allotments. We appreciate the opportunity to comment on the scope of the proposed EA. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

Jason Fearneyhough

Jason Fearneyhough
Director

JF/jc

CC: Governor's Planning Office
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Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
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