

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.



Dave Freudenthal, Governor
John Etchepare, Director

September 5, 2008

Larry W. Sandoval, Jr., District Ranger
Laramie Ranger District
Medicine Bow - Routt National Forest
2468 Jackson Street
Laramie, WY 82070

Dear Mr. Larry Sandoval:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Environmental Assessment (EA) for the North Fork and Three Mile Wildlife Analysis Area prepared by the Laramie Ranger District of the Medicine Bow-Routt National Forest (MBRNF).

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We thank you for notifying our office of the EA and providing us opportunity to comment. It is our understanding the proposed revisions to the Allotment Management Plan (AMP) will address the movement of livestock into unapproved areas (Three Mile Wildlife Area and others), while reducing potential conflicts with other users of the MBRNF.

The WDA does not support Alternative 1: No Action (No Livestock Grazing). The alternative removes livestock from the allotment and all facilities associated with livestock operations. The alternative does not follow the Federal Land Policy and Management Act of 1976 that states, "public lands...will provide food and habitat for fish and wildlife and domestic animals," and should not be considered a viable alternative.

The WDA supports Alternative 2: Current Management. This alternative is considered favorable; by addressing the need for additional fence in the allotment which will in turn assist in the control of livestock movements into unwanted areas. The alternative addresses all the issues set forth in the Purpose and Need of the EA; controlling livestock movements in the allotment; maintaining and improving the rangeland conditions in the Analysis Area (AA); and reducing the potential for conflicts with recreational user, cabin areas, wildlife areas and Glacier Lakes Ecosystem Experimental Station (GLEES), without directly impacting livestock grazing management operations and goals.

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The Proposed Action: Revised Management is less favorable than Alternative 2, but is still considered a viable alternative. The Proposed Action addresses the need for additional fence to manage livestock, reassign allotment boundaries to take advantage of the natural terrain, and adds protection to sensitive areas and amphibians (boreal toad) by the use of range riders or alternative means (i.e. temporary fence, enclosures, stock waters).

The WDA believes the Proposed Action is less favorable than Alternative 2, due to the extra demands placed on the permittee by requiring intensive management of livestock movements in the allotment (range riders, etc.). This is considered a hardship to the operator and can cost the permittee significant amount of time and money. A thorough economic analysis must be performed to evaluate the economic costs to the permittees with regards to each alternative in the EA. The current Economics Section of the EA (pages 32-33) does evaluate the economic impacts to the local communities but does not consider the localized economic impacts to the permittees. We suggest that the analysis includes not only the impacts to the local economies but more importantly the effects the three alternatives will have on the permittees.

The EA discusses how livestock occupy unwanted areas and may cause conflicts with recreational users and cabin areas. However, the EA neglects to discuss the main cause for livestock movements into undesired locations is partially due to gates left open by recreational users and wildlife knocking down fences. The EA needs to reflect a high recreational use in the allotment, and impacts to both livestock and livestock operations.

We strongly encourage your staff to continue to work closely and consistently with all affected agriculture producers, to learn of their concerns and recommendations regarding this project. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of the individual and cumulative impacts upon wildlife habitat and livestock forage, as well as rangeland health for the planning area.

In conclusion, we appreciate the opportunity to comment on the EA. We encourage continued attention to our concerns and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



John Etchepare
Director

JE/CW

CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture