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.

January 28, 2010

Greg Clark, District Ranger
Big Piney Ranger District
Bridger - Teton National Forest
315 South Front Street
P.O. Box 218
Big Piney, WY 83113

Dear Mr. Clark:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Scoping Notice to continue cattle grazing on the Sherman Cattle & Horse Allotment within the Big Piney Ranger District.

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 project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important we be kept informed of proposed actions and decisions and continue to be provided the opportunity to express pertinent issues and concerns.

The WDA supports the Proposed Action Alternative (Current Management), continuation of livestock grazing within the Bridger-Teton National Forest, and strongly disagree with the analysis of a No Livestock Grazing Alternative. Livestock grazing has already been analyzed and is an approved action in the Forest Management Plan. Removing livestock grazing can increase litter which decreases light filtration and decreases seed germination, which has the potential to decrease plant diversity and species richness (Manier and Hobbs 2007[1]). Reductions, limitations or actions prohibiting livestock grazing in the project area shall be considered an adverse impact and therefore analyzed as such.

The WDA insists a full social and economic analysis occur for the No Livestock Grazing Alternative. Livestock grazing on public lands represents a vital economic value to agricultural producers and to local communities. The Big Piney Ranger District needs to

[1] Manier, D. J. and N. T. Hobbs. 2007. Large herbivores in sagebrush steppe ecosystems: Livestock and wild ungulates influence structure and function. Oecologia. 152:739-750.

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include impacts on this economic activity in the analysis. We urge Big Piney Ranger District officials coordinate with the Department of Agriculture and Applied Economics located in the University Of Wyoming - College Of Agriculture, who conducted several studies showing how federal policies impact agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The proposed action may directly affect the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture need to be included in the analysis.

Livestock grazing is an important resource management tool used to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock (Anderson and Scherzinger 1975[2],Derner et al. 2009[3]), and other natural resource objectives (Davies et al 1990[4], Severson 1990[5]) set forth in the Forest Management Plan. The Environmental Assessment should also include a discussion on how livestock grazing can decrease excessive litter accumulation and thus increase plant diversity and species richness (Manier and Hobbs 2007[1]).

The WDA strongly encourages decisions be based on sound science and area specific (long-term) monitoring data. Monitoring should be completed cooperatively with permittees. In addition, any management prescriptions must reflect multiple use resource principles, as described in Federal Land Policy and Management Act of 1976 (FLPMA) Sec. 102(8) stating "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..."

It is imperative to remember that livestock grazing is an approved activity in the Forest Management Plan. Decisions and analyses made in the Alternatives should be based on a case-by-case basis and supported with peer-reviewed science. The analysis needs to identify the science supporting the decisions and discussions and be based on long-term

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[2] 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.

[3] 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.

[4] Davies, K. W., T. J. Svejcar, and J. D. Bates. 2009. Interaction of historical and non-historical disturbances maintains native plant communities. Ecological Applications. 19:1536-1545.

[5] 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.

monitoring data and not based on single incidents, isolated situations, science from a different ecosystem type or political whims.

We strongly support the continuance of commercial livestock grazing within the Allotment. We appreciate the opportunity to comment on the scope of the proposed action. We encourage continued attention to our concerns, and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,

Leanne Stevenson

for Jason Fearneyhough
Director

JF/cw

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