

# 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*



Wyoming Department of Agriculture

April 21, 2009

Kolleen M. Bean, Acting District Ranger  
Brush Creek/Hayden Ranger District  
Medicine Bow – Routt National Forest  
South Highway 130  
P.O. Box 249  
Saratoga, WY 82331

Subject: Public Comment for Snowy Range Cattle #2 Rangeland Analysis Project.

Dear Kolleen Bean:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Public Comment Notice to prepare an environmental document under the National Environmental Policy Act (NEPA) proposing to reauthorize commercial livestock grazing on 6-allotments located within the Snowy Range Cattle #2 Rangeland Analysis Area (AA) on the Medicine Bow-Routt National Forest and Thunder Basin National Grassland.

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 are kept informed of proposed actions and decisions and continue to be provided the opportunity to express pertinent issues and concerns.

The proposed action intends to analyze 6-allotments within the AA. Changes to any of the allotments will significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near the project area. The WDA requests the Brush Creek/Hayden Ranger District analyze the following impacts.

Management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on federally administered lands. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) about livestock grazing, needs to be specifically noted in the environmental document. 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 and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource and the State of Wyoming.

Grazing on public lands represents a vital economic value to agricultural producers and to local communities. The Brush Creek/Hayden Ranger District needs to include impacts on this

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economic activity in the analysis. We urge Brush Creek/Hayden 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, 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.

In addition to the economic impacts, livestock grazing represents irreplaceable environmental and social values. Sheep and cattle have grazed these allotments for generations. These values and traditions contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of Wyoming and the West. Brush Creek/Hayden Ranger District should include potential losses of these essential environmental, historic, and social values of livestock grazing in the scope of the analysis.

The WDA appreciates the efforts of the Brush Creek/Hayden Ranger District staff in working with interested permittees and we strongly urge this practice continues with all permittees utilizing the 6-allotments. We encourage Brush Creek/Hayden Ranger District officials to work with all grazing permittees and agriculture producers affected by this plan to learn of their concerns and recommendations. The Brush Creek/Hayden Ranger District should take full advantage of permittees' irreplaceable, long-term, on-the-ground. Permittees are particularly aware of how impacts will affect rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound. Thus, we strongly recommend Brush Creek/Hayden Ranger District officials aggressively address the concerns and recommendations of these stewards throughout the planning process. This includes ensuring grazing permittees who are directly affected by this plan receive all notices the proposed project.

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. The environmental document and analysis must include (1) the positive effects livestock grazing has upon the environment, and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Forest Management Plan.

Livestock grazing is an approved activity in the Revised Forest Management Plan. The Brush Creek/Hayden Ranger District decisions made in the proposed action 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 monitoring data and not based on single incidents, isolated situations, or political whims.

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Reductions, limitations or actions prohibiting livestock grazing in the AA are considered an adverse impact. It is important the Brush Creek/Hayden Ranger District analyzes potential identified issues in the analysis on a case-by-case basis while considering all the potential causal factors associated with a potential issue, rather than isolating or focusing on just livestock grazing, which was done well in both the Scoping Report dated March 2009 and the Public Comment Notice letter dated March 23, 2009.

The Scoping Report fails to give detailed information regarding the vacant allotments (Pass Creek & Bow River). By not identifying any proposed actions for these allotments, we are left to assume that they will continue to be available for livestock grazing. The WDA does not support the retiring of these allotments from permitted livestock grazing, but would consider protecting these allotments for future grazing opportunities by placing them into a forage reserve, where a permittee could utilize the forage reserve for temporary deferment due to prescribed burns, wildfire, insect infestation or other management actions. The placement of the vacant allotments into a forage reserve must be accompanied with open discussions with adjacent permittees and provide proper scientific analysis.

We strongly support the continuance of commercial livestock grazing on the 6- allotments, along with the proposed watershed and habitat improvement projects. 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,



John Etchepare  
Director

JE/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  
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