

# 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

August 28, 2008

Jay L. Dunbar, District Ranger  
Greys River Ranger District  
Bridger - Teton National Forest  
671 N. Washington Street  
P.O. Box 339  
Afton, WY 83110

Dear Mr. Jay Dunbar:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Scoping Notice for the Spring Clean-Up Sanitation Project - Categorical Exclusion (CE) located in the Greys River Ranger District of the Bridger - Teton National Forest (BTNF).

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 support the efforts of the BTNF to proactively manage forest lands and understand the need for an immediate and proactive action regarding the Mountain Pine Beetle epidemic occurring in the Spring Creek project area of the Bridger-Teton National Forest. Clear cutting, selective thinning of trees and other adaptive management practices will increase plant diversity, sustain a healthier forest, create habitat for wildlife and increase herbaceous vegetation for livestock and wildlife in the treated area. However, the immediate and potential secondary effects of the proposed project will impact grazing permittees and agriculture producers both in and adjacent to the proposed project area. For this reason, we offer the following comments.

## **Consider Impacts to Grazing Allotments**

The immediate impact on livestock grazing is the decrease in Animal Unit Months (AUMs) in the active treatment area. Although this is considered temporary, we ask the BTNF analyze this impact to livestock and management operations on the BTNF. We also believe the following secondary impacts will affect livestock grazing and ask for their inclusion in the CE:

- Addition of new roads, maintenance and increased use of existing roads will:
  - Allow for invasive and noxious weeds to establish in disturbed areas,
  - Increase vehicle traffic impacting livestock movements, and potential injury and death due to collisions,
  - Disturb and harass livestock by recreation users,
  - Lose palatable vegetation due to increased dust on vegetation,

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- Allow livestock to move into unwanted areas due to gates being left open.
- Increase off-road travel, directly impacting vegetation and compaction of soils.
- Surface disturbance (including burn/slash piles, grading, skid trails, etc.)
  - Increase the opportunity for invasive and noxious weeds to establish in disturbed areas,
  - Lose vegetation and AUMs during the proposed action.

The proposed project may increase costs and decrease revenues for grazing permittees using the forest allotments for their livestock, by increasing livestock management and the potential loss of AUMs. The accumulated impacts of this, nearby and future projects are a continuous concern to the WDA and our clients. The individual and cumulative impacts and the proposed remedies need to be thoroughly identified, evaluated and added to the CE.

We insist on timely and successful reclamation and mitigation. It is imperative for reclamation and seeding with an approved seed mix for all new/temporary roads, and disturbed areas. This includes the monitoring and eradication of invasive and noxious weeds in all disturbed areas until desired vegetation is established. Inclusion of appropriate mitigation and reclamation measures is necessary in the final CE.

We strongly encourage the Forest Service staff to work closely and consistently with all affected grazing permittees and agriculture. Agriculture producers are intimately familiar with the area affected by the proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and forest health for the subject area. We highly recommend the Forest Service seek and address the concerns and recommendations of these stewards of habitat, forage, and rangeland health.

In conclusion, we support the BTNF's efforts to proactively manage forest lands and we appreciate the opportunity to comment on the Categorical Exclusion for the proposed actions. 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