



Mark Gordon, *Governor*  
Doug Miyamoto, *Director*  
2219 Carey Ave. • Cheyenne, WY 82002  
Phone: (307) 777-7321 • Fax: (307) 777-6593  
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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 14, 2025

Patrick Champa, Bearlodge Ranger District, District Ranger  
Elizabeth Krueger, Bearlodge Ranger District, Resource Planner  
USDA Forest Service-Bearlodge Ranger District  
Attn: North Sand Project  
P.O. BOX 680  
Sundance, WY 82729  
<https://www.fs.usda.gov/project/?project=65540>

**RE:** North Sand Forest Management Project

Dear Mr. Champa,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the U.S Forest Service-Bearlodge Ranger District (BRD), North Sand Forest Management Project (Project).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The proposed Project area consists of 11,062-acres in the BRD, at the north end of the Black Hills National Forest in Crook County, Wyoming. The WDA fully supports the proposed Project to use various commercial and non-commercial timber harvest and thinning activities to improve conditions on the forest.

WDA encourages the BRD to use domestic livestock grazing, specifically for thinning bur oak shrubs, in the Project area. The use of domestic livestock to help reduce oak shading, increase species diversity, and allow for establishment and regeneration of pine, is one of the least impactful management activities the BRD can employ. Additionally, the use of domestic livestock can reduce the need to construct control lines for burning, reduce the need for additional equipment for chipping and burning, and provide more flexibility in the timing of treatments.

Finally, WDA urges the BRD to consider the benefits of proper livestock grazing management for post-project recovery. There are situations when properly timed high intensity, short duration grazing may be beneficial. To develop reasonable vegetative objectives, the BRD should work with livestock grazing permittees to develop flexible opportunities for livestock grazing in the Project area and avoid relying on rest and deferment as a management tool. WDA opposes a mandatory 2-year rest, often used as part of agency vegetative treatments. Additionally, the WDA encourages BRD to utilize livestock grazing in such a manner to help reduce fine fuels as an added tool in fire management practices.

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2/14/25

Page 2 of 2

Thank you for providing the WDA an opportunity to comment. If you have questions, please contact Linda Cope, Senior Policy Analyst at 307-777-7024.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Miyamoto", is written over a horizontal line.

Doug Miyamoto  
Director

DM/lc

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts  
Wyoming Game and Fish Department  
Wyoming County Commissioners Association  
Public Lands Council