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Comments: Please see the attached comment letter from the Wyoming Department of Agriculture regarding the Draft Environmental Assessment for the Tensleep Canyon Climbing Management Plan in the Bighorn National Forest.

Dear Mr. Sorenson, Following are the Wyoming Department of Agriculture (WDA) comments regarding the Draft Environmental Assessment (DEA) for the Tensleep Canyon Climbing Management Plan (Project) in the Bighorn National Forest (BNF). 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. Despite the WDA's Scoping comments submitted on November 20, 2023, the DEA fails to analyze impacts on livestock grazing. The DEA should analyze direct and cumulative effects, including forage loss, noxious weed spread, impacts on range infrastructure and maintenance, and the potential for increased human-livestock conflicts. The DEA identifies the Dry Tensleep (00502) and North Canyon (00504) allotments, but fails to provide data, including total acreage, permitted Animal Unit Months (AUMs), and specific livestock type(s). Which are essential for the public review and for the authorized officer to make informed decisions. The Final Environmental Assessment (FEA) must include these quantitative details for all allotments directly within the project area. Furthermore, the DEA should expand its analysis to include adjacent allotments. Specifically, Battle Park (501), Monument (00508), and South Canyon (00505). Excluding these areas ignores potential cumulative effects from increased recreational use in the project area. Infrastructure Development and Permittee Protections: The WDA supports the relocation of the North Canyon stock tank and the Dry Tensleep fence upgrades to reduce recreational conflicts with livestock grazing management. However, the DEA should identify the logistical and financial framework for all proposed infrastructure, including the North Canyon stock tank relocation, Dry Tensleep fencing upgrades, and the new parking and restroom facilities. Specifically: Maintenance & Costs: The Forest Service should explicitly state all long-term maintenance and labor costs for new infrastructure. Including cattle guards, gates, perimeter fencing, and boot scrapers. Any maintenance regarding the new infrastructure should be the responsibility of the BNF, and not a term and condition on livestock grazing permittee. Operational Windows: To avoid disrupting grazing operations, any construction or relocation (such as the North Canyon stock tank) should occur outside of the permit's season of use. Containment Risks: The DEA should analyze the impacts associated with recreationalists leaving gates open on new permanent fencing and the subsequent impacts on livestock containment. While the current proposal lacks a provision for gates, the DEA should evaluate their inclusion to ensure recreational access to trailheads does not compromise livestock containment or grazing operations. The DEA should clarify whether perimeter fencing will preclude livestock from the parking lot or restroom facilities. The WDA strongly suggests closely working with the permittees on the location of new infrastructure and other related issues prior to a FEA. Proposed Infrastructure: The DEA currently lacks an analysis of how permanent land conversions will impact grazing capacity. The DEA must analyze site-specific infrastructure and affiliated AUM reductions for: Proposed Parking Area: A 50 vehicle parking-lot, approximately 2-acres in size. The DEA fails to provide allocation or analysis of the proposed parking area. The WDA suggests the DEA analyze the specific location and potential resource impacts. Restroom Facilities: Vaulted toilets have been proposed for recreational use, which is a crucial need for the area. However, the DEA should specify the exact locations for vault toilet installation (likely within the North Canyon Allotment), and analyze their potential impact on livestock grazing. Additionally, the DEA must resolve the discrepancy between the text, which proposes up to four locations, and Figure 3, which only displays three. The WDA suggests relocating the far west restroom to mitigate significant operational challenges for the grazing permittee. The area is already a natural grazing bottleneck; however, the presence of the restroom compounds this issue by concentrating high volumes of recreational users in a confined

space. This congregation obstructs livestock movement and restricts forage access. Relocating the facility would disperse recreational traffic, reduce human-livestock conflict, and restore the flow necessary for permittee desired grazing.

The Dry Tensleep permanent Fencing: While Figure 3 illustrates the proposed alignment for the permanent fencing, it does not specify the total linear feet. To ensure a comprehensive project analysis, the WDA suggests that the DEA include the exact length of the proposed fence line.

The North Canyon Stock Tank: While Figure 3 illustrates the existing location of the stock tank, it lacks the proposed relocation site.

AUM Mitigation: The proposed infrastructure will impact AUMs; therefore, the DEA must analyze these specific locations and their potential resource impacts. The BNF should ensure that infrastructure developments do not result in a loss of permitted AUMs without formal mitigation or compensation.

Invasive Species and Weed Management: While the DEA proposes boot scrapers to mitigate invasive species, it should detail a comprehensive weed management plan. It should state that the responsibility for executing and funding these plans rests solely with the BNF, ensuring no additional labor or financial burden is shifted to the grazing permittee.

Lastly, the proposed public education initiative should be expanded to include public land grazing. The DEA should mandate signage at all trailheads and access points to inform visitors of the presence of livestock, the value of public land grazing and emphasize the public safety for keeping gates closed.

In summary, the DEA fails to provide a comprehensive analysis of the project's impacts on livestock grazing. To remedy these deficiencies, the DEA should analyze direct, indirect, and cumulative impacts on all livestock grazing allotments; quantifying total acreage, permitted AUMs, changes to grazing management, and livestock type(s). The DEA must identify the net loss of AUMs resulting from permanent land conversion for infrastructure, such as restroom facilities and parking areas.

Furthermore, the DEA should implement a formal weed management plan to ensure range land health and forage quality meet Forest Service desired conditions.

We look forward to seeing these concerns addressed with the necessary specificity in the FEA and Decision Record. If you have any questions, please contact Holly Siebert, Senior Policy Analyst at 307-777-7024.

Sincerely,
^ Doug Miyam
Director

DM/hs
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