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First name: Doug

Last name: Miyamoto

Organization: Wyoming Dept of Ag

Title: Director

Comments: Dear Mr. Berrett,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the scoping notice for the Pole Creek Vegetation Management Project {{Project}} for the Powder River Ranger District {{PRRD}} of the Bighorn National Forest {{BNF}}, Johnson County, WY.

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 WDA fully supports the PRRD proposal to use forest management practices to improve the health and productivity of forests, grasslands and watersheds in the PRRD project area. We commend the BNF for utilizing a proactive approach to improve forest conditions. Diversifying timber age class, inclusion of marketable forest products, addressing human safety and mitigating hazardous fuel loading will benefit forest and users.

The WDA encourages the PRRD to analyze the following effects upon livestock grazing in the environmental document: introduction and spread of noxious weeds, mitigation and reclamation of disturbed areas, impacts upon livestock grazing by both the tree salvage and prescribed burning operations, impacts due to road closures and additional new roads, opened gates, increased dispersed recreation impacts and other social and economic impacts to livestock operators and livestock management operations.

Fencing projects identified in the "Associated Activities" section and proposed range fence realignment, should be coordinated with permittees and constructed in such a way as to not hinder or eliminate livestock grazing opportunities in the PRRD project area.

We request the PRRD evaluate the duration of time needed before grazing can occur on prescribed burn areas be evaluated on a case-by-case basis in cooperation with grazing permittees. Short duration livestock grazing in burned and thinned areas is a tool known to help revitalize re-emergent vegetation. The PRRD should develop a noxious and invasive weed plan as part of the post-fire rehabilitation activities. The WDA supports using effective and biologically friendly treatments, including use of livestock grazing as a management tool, to help control noxious and invasive weeds on the forest.

The WDA recommends the PRRD work with permittees to utilize proper grazing opportunities in the 800 acres of proposed aspen stand enhancement treatments. There are situations when properly timed high intensity, short term grazing is needed in areas to benefit the aspen community. Early season grazing within aspen communities essentially creates rest from grazing for aspen stands, due to low cow preference for aspen during this period. 1

The WDA encourages the PRRD to use lop and scatter of debris and timber in such a way as to still allow for grazing. Additionally, permittees should have full and safe access in lop and scatter areas to graze, manage and gather livestock.

We encourage PRRD officials continue working with all livestock grazing permittees who may experience adverse effects created by this project. Grazing on public lands is of significant value to agricultural producers as

well as local communities. The impacts created by the proposed project could initially decrease revenues for grazing permittees and other agricultural producers. We ask the PRRD to consider these additional concerns in the analysis for the environmental document. We encourage flexibility in making the best site specific, case-by-case decisions that are in the best interest of the affected resources throughout the life of the proposed project.

The WDA appreciates the opportunity to comment on the scope of the proposed project. We encourage continued attention to our concerns and look forward to hearing and being involved in proposed actions and decisions.

If you have questions, please contact Linda Cope, Senior Policy Analyst at 307-777-7024.

Sincerely,

Doug Miyamoto

Director

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

1 Cattle Grazing Management and Aspen Restoration - UC Rangelands
<https://rangelands.ucdavis.edu/research/publiclandsgrazing/cattlegrazingandaspenrestoration>