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Organization: Wyoming Department of Agriculture

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Comments: Please see the attached comment letter from the Wyoming Department of Agriculture regarding the U.S. Forest Service-Shoshone National Forest, Green Union Project: Draft Environmental Assessment.

March 27, 2024

Tanner Shuler, Silviculturist

USDA Forest Service-Wind River Ranger District Wind River Ranger District

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<https://cara.fs2c.usda.gov/Public//CommentInput?Project=64775> RE: Green Union Project Draft Environmental Assessment

Dear Sir/Madam,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the U.S. Forest Service-Shoshone National Forest (SNF), Green Union Project: Draft Environmental Assessment (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 will encompass approximately 9,683-acres of mechanical and vegetation thinning and prescribed fire treatments in the SNF. The WDA fully supports the Project proposal to use management practices to improve the health and productivity of the forest, decrease opportunities for disease, and maintain and/or restore forest cover, degree of stocking, and rates of growth.

The WDA urges the SNF 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. In order to meet vegetative objectives, the SNF should work with permittees to develop flexible opportunities for livestock grazing in the Project area and avoid using rest and deferment as a management tool.

WDA does not support a reduction in AUMs. SNF should work with livestock grazing permittees to ensure that AUMs are maintained using flexible livestock grazing management tools.

RESOURCE AREA IV-[Prescribed Fir]: 38 Prescribed Fire and Harvest Units, Pg.108

"Post-prescribed burn and timber harvest units, assess the need for resting pastures from livestock use through adjusting grazing rotations, implementation of temporary fencing, additional riding of grazing permittees. Prescribed fire treatment units will be rested from livestock grazing based upon the vegetation response and recovery after burning, as prescribed by a soils scientist, ecologist, and range specialist. 11(SNF[shy] Green Union Project)

WDA recommends SNF change language in the Project EA to include acceptable tools and condition where rest and deferment may be incorporated for short-term grazing management with built-in flexibility.

Recommended Language:

Post-prescribed burn and timber harvest units, assess the need for modification of livestock grazing, including pasture rotation, use of temporary electric fence and increased range riding. Prescribed fire treatment units may be rested or deferred based on current conditions, and must meet reasonable and realistic vegetation objectives, documented and agreed to with livestock grazing permittees, prior to the Annual Operation Instruction meetings.

Any proposed fence enclosure projects should be coordinated in advance with impacted livestock grazing permittees. Fence-out agreements should include type of fence, original intent of project, end-dates, and vegetation conditions for removing fence. WDA does not support retaining an enclosure for any intent beyond the original purpose, or modifications to the original end dates agreed on between the livestock grazing permittee and the SNF. If fencing is proposed, fencing plans and dates should provide flexibility and opportunities for permittees to utilize enclosed areas when needed. Permittees will not provide fencing material or maintain any fencing enclosure on the SNF.

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

Mark Gordon, Governor

Doug Miyamoto, Director Wyoming Department of Agriculture

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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