



WYOMING WOOL GROWERS ASSOCIATION

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Mr. William T Bass
Forest Supervisor
USDA USFS Bighorn National Forest
2013 Eastside 2nd St.
Sheridan, WY 82801

RE: Proposed Monitoring Transition

Dear Mr. Bass,

The Wyoming Wool Growers Association (WWGA) appreciates the opportunity to comment on the proposed administrative changes to Chapter 4: Monitoring and Evaluation of the Revised Land and Resource Management Plan. The changes may have an impact a number of our members who hold grazing permits in the Bighorn National Forest.

The WWGA represents Wyoming's sheep and wool industry and serves to protect, preserve and promote the interests of sheep producers and other livestock owners in Wyoming. Incorporated into our organization's purpose is the goal to enhance and ensure Wyoming's natural resources through sound management practices, including those that promote healthy and productive rangeland and water resources. The WWGA has been working toward with these goals since its formation in 1905.

Our members have a direct interest in ensuring that the changes implemented to meet the requirements of the 2012 Forest Planning Rule are workable and the goals set within it are achievable by Forest Service personnel. We have several members who may be directly affected by changes to the monitoring plans for the Bighorn National Forest so we would like, if possible, to be kept informed of proposed actions and decisions and provided opportunities to share information on pertinent issue and concerns.

Overall, what is proposed in Chapter 4: Monitoring and Evaluation appears acceptable but we do have some concerns, particularly with regard to reporting frequencies throughout the document and some specific concerns related to permitted livestock grazing and economic benefits. Lastly we have general concerns about the ability to meet these requirements as set out in the strategy.

The proposed changes establish different reporting frequencies for a number of interrelated categories for monitoring and evaluation. The different frequencies for reporting within these categories will make comparisons more difficult. For example "forest ecosystem health" is reported every two years or as needed in response to disturbance events, however the major components of ecosystem health, such as "air quality" and "species viability" are only required to be reported every six years. We think it would be advisable to make reporting frequencies within the different uses of the forest (recreation, grazing, etc.) the same if the purpose of these monitoring elements and questions is to identify trends, This way accurate comparisons can be made.

Rangeland Health: Our concern is related to both the monitoring question ("What is the **long-term trend** of rangelands?") and the reporting frequency listed for this monitoring element. The question and the potential data sources/protocols specify long-term trends but the reporting frequency is very short term (3 years). Two years is not sufficient time to determine a trend of any kind, much less a long term trend. This could result in inaccurate trend reporting that could be used by some who oppose grazing to insist on unsubstantiated alterations to permitted livestock grazing. A five year reporting frequency would be preferred and would at least begin to indicate if a trend is developing. Otherwise, it would be advisable to make a change in the wording of the question so that the reporting frequency is consistent with the monitoring question.

Permitted Livestock Grazing: We are not clear on the information the monitoring question for this monitoring element is intending to capture. Is the purpose of the question, “What is the trend of livestock grazing on the Forest?” to determine how many permits are issued? Or, to show how many AUMs are assigned? Or, to capture what the actual livestock numbers grazed on the Forest are? Since the monitoring element and the monitoring question are clearly tied to all three potential indicators (AUMs, permitted use and actual use), the question should be reworded to collect accurate information regarding all three.

Economic benefits: The frequency of reporting of the economic benefits for land use, such as timber, recreation, range, etc., for example, is proposed at ten years while many of the monitoring elements, such as permitted livestock grazing, are reported with as much as five times greater frequency. Changes in these monitoring elements will impact the economic benefits of the Forest. Unfortunately the impacts of these changes on the economic benefits will not be reported as frequently. As a result, the Forest could lose important management opportunities and tools that would benefit it. We think these reporting frequencies should be closer together.

Lastly, we are concerned about the ability of the Forest Service personnel to meet the reporting requirements as outlined, particularly with regard to the many monitoring elements with two year reporting frequencies. If these reports become labor intensive, which we hope they would not, they could create additional workloads on already taxed personnel who are trying to meet a host of other regulatory obligations, such as NEPA. The monitoring requirement #4, as written on page 4-5, which states “*The status of a select set of the ecological conditions to contribute to the recovery of federally listed, threatened and endangered species, conserve proposed and candidate species and maintain a viable population of each species of conservation concern” does more to increase our concerns of the potentially overwhelming workload this strategy might create than ease it. According to this requirement not only will ecological conditions for recovery of federally listed endangered or threatened species have to be monitored but also for any proposed and candidate species. On top of that, Forest personnel will also have to monitor the ecological conditions to ensure viable populations of species of conservation concern. This could be an enormous list of species!*

What will be the criteria to determine this list of species for which monitoring of ecological conditions will be required? How will the BHNF determine the “select set of ecological conditions” for each species on this list? This open-ended requirement has the potential to put forest personnel in a situation where they cannot meet the very requirements the FS has created for itself, subsequently setting itself up for failure and open to potential litigation for not meeting its own requirements. This will serve no one well.

Again, we appreciate the opportunity to weigh in on these proposed changes. If you need further information from us, please do not hesitate to contact our office.

Sincerely,



Amy W. Hendrickson
Executive Director

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