



Mark Gordon, *Governor*
Doug Miyamoto, *Director*
2219 Carey Ave. • Cheyenne, WY 82002
Phone: (307) 777-7321 • Fax: (307) 777-6593
Web: agriculture.wy.gov • Email: wda1@wyo.gov

The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

January 9, 2024

Mara Alexander
National Adaptive Management Program Lead
Ecosystem Management Coordination
201 14th Street SW
Washington, DC 20024
mara.alexander@usda.gov
<https://cara.fs2c.usda.gov/Public//CommentInput?project=ORMS-3585>

Dear Mara Alexander,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the National Forest Service (NFS) proposed directive contained in Forest Service manual 2000, National Forest Resource Management, Chapter 2040 – National Forest System Monitoring.

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 appreciates the NFS developing a framework for data collection, however, this draft proposed directive to track conditions to inform decision-making and adaptive management creates more questions and needs more clarity before the directive is finalized.

The following are questions and areas we believe need to be clarified:

- Page 5: The directive outlines 5 Objectives. Objective 3 identifies the use of "...reliable, relevant science..." – We encourage the NFS rely on specific and peer reviewed science. Local, site specific science should be used when making any decision regarding landscape or resource-based decisions.
- Page 7: "...evidence-based decision-making..." – Please provide a definition of what Evidence-Based is and provide an example. We would suggest the use of science or peer reviewed science for making defensible decisions and not base decisions or adaptive management on evidence-based data.
- Page 7: (Principal 1(a)) – This Principal describes the land and resource management needs. – The WDA would encourage this specific Principal identify the use of science and/or peer reviewed science in the assessing land and resource management and decision-making.
- Page 9: (Principal 4) Partnerships – The WDA appreciates the directive identifying State Agencies assisting in the design and implementation of monitoring, along with, analyzing and reporting of results.

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- Page 9: (Principal 4 (b)) “Integrates multiparty monitoring and other external partnerships to add capacity and expertise.” – The WDA would appreciate further clarity regarding multiparty monitoring. Who determines if the individuals are qualified in the collection of data and who will be responsible for verifying the collected data.
- Definitions: Please provide definition or clarity for the following: Accurate, Reliable, Relevant Science; Existing Monitoring Programs; Evidence-Based Decision-Making; Accurate, Reliable, and Relevant Science; Internal Partnership; External Partnership.

We want to thank you for the opportunity to comment. If you have any questions, please contact Chris Wichmann, Manager - Natural Resource and Policy Division, at 307-777-6757.

Sincerely,



Doug Miyamoto
Director

DM/cw

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
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