Wyoming
Department of Agriculture

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March 24, 2006

Tom Foertsch, Physical Scientist
BLM, Rawlins Field Office
P O Box 2407
Rawlins, Wyoming 82301-2407

Dear Tom:

Following are our comments for the Scoping Notice for the proposed Environmental Analysis (EA) for the Hatfield 3D Seismic Survey 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 this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, please continue to keep us informed of proposed actions and decisions and provided us the opportunity to express pertinent issues and concerns.

This project will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and near the project area.

In addition to these individual impacts, the Rawlins Field Office (FO) should evaluate the cumulative effects of this and other energy development projects in the area for their impacts on rangelands, noxious weeds, and livestock grazing.

Following are specific individual effects that need to be analyzed in the EA: off-road traffic, increased road traffic and speeding vehicles; destroyed cattle guards; deaths and impairments of livestock; consequences on Animal Unit Months and pastures for grazing; social and economic impacts on livestock operators, cut fences, opened gates, damaged range improvements, introduction and spread of noxious weeds; and potential conflicts with livestock management operations.

Moreover, the checkerboard of private and BLM lands within the project area increases the potential for conflicts with livestock grazing operations and landowners. The EA needs to specifically analyze the consequences of this project within the checkerboard area and the impacts of access on private lands.

Because of the checkerboard ownership and the existence of grazing permits in the project area, the BLM Rawlins FO should have sent this Scoping notice to all affected landowners and grazing permittees. We strongly encourage the project operators and BLM officials to continue to keep landowners and grazing permittees informed and to work with them to learn of their concerns and recommendations regarding this project.

Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and in adjoining areas, need to be included in the study.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and these mandates, statutes, and regulations should be an integral part of the assessments. Moreover, the impact of this project upon the goal of the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals needs to be evaluated. The impacts upon food and habitat for fish and wildlife are usually well documented in National Environmental Policy Act documents. The consequences of this project upon food and habitat for domestic animals deserve the same degree of study and documentation.

In fact, grazing is an essential resource management tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EA needs to include these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives.

Peer-reviewed science should underlie decisions and the EA needs to identify the science that supports the decisions and discussions regarding this project.

Decisions in the proposed plan should provide BLM officials, grazing permittees, and company officials the opportunity throughout the life of this plan to work cooperatively and the flexibility to make site-specific, case-by-case decisions based on local conditions that are in the best interests of our affected resources and our citizens.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions, we encourage continued attention to our concerns, and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

John Etchepare
Director