Wyoming
Department of Agriculture

Dave Freudenthal, Governor

John Etchepare, Director

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
E-mail: wda1@state.wy.us ■ Website: wyagric.state.wy.us

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May 10, 2006

Brush Creek/Hayden Ranger District
Medicine Bow National Forest
Attn: Terry DeLay, ID Team Leader
P. O. Box 249,
South Highway 130
Saratoga, WY 82331

Dear Terry:

Following are our comments for the Scoping Report for the Summer Soldier Environmental Analysis (EA) by the Brush Creek/Hayden Ranger District (RD) of the Medicine Bow National Forest of the U. S. Forest Service (FS).

Our comments are specific to our mission: to be dedicated 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, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

This project will likely affect grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and near the project area. For this reason, we are making the following comments.

Following are some specific individual effects upon livestock grazing that should be analyzed in the EA: grazing access to opened areas, impacts upon livestock grazing by prescribed burning, decreased AUMs and pastures for grazing, deaths and impairments of livestock from increased traffic, operational activities, and noxious weeds, impacts of new and modified roads, destroyed cattle guards, decreased palatability of vegetation and forage from operational activities and prescribed burning, cut fences, opened gates, damaged range improvements, unsuccessful reclamation of disturbed areas, introduction and spread of noxious weeds, and other detrimental social and economic impacts upon livestock operators and livestock management operations.

The impacts of the project could increase costs and decrease revenues for grazing permittees and other agriculture producers. The accumulated impacts of this and nearby projects could jeopardize the continued existence of grazing operations in this area. The individual and cumulative impacts and the proposed remedies need to be thoroughly identified and evaluated.

Timely and successful reclamation and mitigation are needed and should be required. Reclamation and mitigation requirements and the consequences for gas operators failing to accomplish this reclamation and mitigation should be stated.

We strongly recommend the use of managed livestock grazing in burned areas to help revitalize re-emerging vegetation and the return of livestock grazing into burned areas at the first feasible opportunity. We also strongly recommend consideration of livestock grazing in areas opened by the vegetation treatments of this project.

We strongly encourage FS staff and commercial operators to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. Agriculture producers are intimately familiar with the areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of the individual and cumulative impacts upon the wildlife and livestock habitats and forage and rangeland health for the planning area. They will best appreciate the agricultural practices affected by this project. Moreover, it is imperative that FS officials continuously inform all livestock grazing permittees and other agriculture producers directly or indirectly affected on the issues, decisions, and resulting actions regarding this proposal.

Most environmental impact studies are woefully deficient in identifying or analyzing social and economic impacts imposed by proposed energy developments. We appreciate the fact that RD staff include numerous and diverse environmental specialists and virtually no social and economic analysts. As a result, virtually all environmental impact studies ignore the detrimental social and economic costs imposed by proposed projects upon the citizens who are most affected by these burdens: those living within and adjacent to the planning area. The EA needs to include a full and thorough social and economic impact analysis, including an evaluation of the impacts upon livestock grazing and agriculture production in the area.

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 and the social impacts analyzed in the EA.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and should be an integral part of the assessments, including the intent of Congress to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. 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 (1) these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives and (2) the impacts of this project on limiting the ability of livestock grazing to achieve these positive effects.

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 allow BLM officials, grazing permittees, and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens throughout the life of this plan.

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

cc: Governor's Planning Office
Wyoming Game and Fish Department