Wyoming
Department of Agriculture

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John Etchepare, Director

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March 16, 2005

Dan Dallas
Acting Forest Supervisor
Uinta National Forest
P.O. Box 1428
88 West 100 North
Provo, UT 84603

Dear Mr. Dallas:

Following are our comments for the Scoping Notice for the Environmental Impact Statement (EIS) to determine under what conditions leases would be issued on the Uinta National Forest System Lands.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As energy development has major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, it is important that the WDA remain involved in all actions and decisions affecting the agriculture industry and that we have the opportunity to express pertinent issues and concerns.

Oil and gas leasing impacts 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 Uinta National Forest (UNF) 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 analyzed in the UNF: 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 Bureau of Land Management (BLM) lands within the project area increases the potential for conflicts with livestock

Moreover, the checkerboard of private and Bureau of Land Management (BLM) lands within the project area increases the potential for conflicts with livestock grazing operations and landowners. The EIS 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 Salt Lake Field Office should send this Scoping notice to all affected landowners and grazing permittees. We strongly encourage any energy company officials, Forest Service (FS), 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 represents irreplaceable environmental and social values, contributing to the preservation of open space, the scenic vista and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming, Utah, 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 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, livestock 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 EIS 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 EIS needs to identify the science that supports the decisions and discussions regarding this project.

Decisions in the proposed plan should allow FS and BLM officials, grazing permittees, and energy company officials the opportunity throughout the life of this plan to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interest of the affected resources and citizens. Make decisions based on local information and conditions and not on nation-wide mandates that commonly do not apply locally.

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

JE/mh

CC: Governor's Planning Office
Wyoming Farm Bureau Federation
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Board of Agriculture