



---

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

October 11, 2018

United States Bureau of Land Management  
Worland Field Office  
Attn: NEPA Coordinator  
101 S. 23<sup>rd</sup> Street  
Worland, Wyoming 82401

To whom it may concern,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Bureau of Land Management (BLM) Draft Environmental Impact Statement (dEIS) for the Alkali Creek Reservoir 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 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.

We are supportive of this project as it can have benefits to local communities and agricultural producers.

WDA commented on the Preliminary dEIS and it appears many of our comments were not included before the dEIS was released. In addition to the comments below, we would ask the BLM re-review and include our Preliminary dEIS comments.

In general, we struggle to understand the logic behind many portions of the analysis and find the overall tone to be highly negative towards agriculture, private lands, and the project in general. Again, many of our comments on the Preliminary dEIS highlighted these concerns yet the dEIS does not appear to have addressed them.

One example of this is contained in section 4.8 – Public Health and Safety under “Contributing Cumulative Actions” (pg. 153) where the BLM states: *“Past and present actions that may have contributed or may contribute to public health and safety risks include agricultural uses such as farming and ranching (e.g., herbicide and pesticide use); grazing (e.g., effects to water quality); development of any irrigation projects in the watershed; construction of roads, highways, and power and transmission lines in the CIAA; and development of small towns and associated infrastructure (e.g., Hyattville).”*

We do not believe this corresponds with the definition given in the Introduction to Chapter 4 (pg. 147) which defines a cumulative effect as *“...an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable actions...”* The BLM later discusses potential dam failure and potential adverse impacts of failure (Section 4.8.2; pg. 154), yet never makes a connection between statements in 4.8.1 (pg. 153) and the project itself.

*Equal Opportunity in Employment and Services*

**BOARD MEMBERS**

Jana Ginter, *District 1* • James Rogers, *District 2* • Shaun Sims, *District 3* • Amanda Hulet, *District 4* • Mike Riley, *District 5*  
Bryan Brost, *District 6* • Kevin Schieffer, *District 7*

**YOUTH BOARD MEMBERS**

Kendall Roberts, *Southeast* • Jared Boardman, *Northwest* • John Hansen, *Southwest* • Cameron Smith, *Northeast*

Alkali Creek Reservoir

10/11/2018

Page 2 of 2

If the intent of Section 4.8.1 is to illustrate the ongoing and potential future actions that could be impacted by a dam failure this is not being clearly conveyed. If this is the intent, the BLM should qualify all statements with "In the event of dam failure..." or similar. We suggest the BLM review 40 CFR 1508.7 definitions and appropriately tailor the discussion within the analysis.

Again, we would like to voice our support of the project overall and believe it will provide multiple benefits to agricultural producers, local businesses, and the communities. Thank you for the opportunity to comment.

Sincerely,



Doug Miyamoto  
Director

DM/jb

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Association of Conservation Districts  
Wyoming Farm Bureau Federation  
Wyoming County Commissioner's Association

Wyoming Game and Fish Department  
Wyoming State Grazing Board  
Wyoming Stock Growers Association  
Public Lands Council