



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

November 2, 2015

John Russell
Project Manager
BLM Rawlins Field Office
1300 North Third Street
PO Box 2407
Rawlins, WY 82301-2407

Dear Mr. Russell,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bureau of Land Management's (BLM) Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Proposed Lost Creek Uranium In-Situ Recovery Project (ISR Project) Amendments.

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 this project impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

We understand the proposal is an amendment to add 5,750 acres to the existing Lost Creek Project area, totaling nearly 10,000 acres, including 650 acres of new surface disturbance. Considering the project nearly doubles in size, it will undoubtedly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources. For these reasons, we offer the following comments.

We urge the BLM to analyze the individual effects upon livestock grazing in the EIS including: large areas fenced off from grazing, decreased Animal Unit Months (AUMs), ground and surface water quality potential impacts, increased off- and on-road traffic, increased number of speeding vehicles, construction of new roads and modifications to existing roads, increased number of vehicles in the area with potential conflicts with livestock, cut fences, opened gates, damaged range improvements, decreased palatability of vegetation and forage from road dust and development activities, unsuccessful reclamation of disturbed areas, introduction and spread of noxious weeds, and other detrimental social and economic impacts on livestock operators and livestock management operations.

We strongly encourage BLM staff and ISR Project operators to work closely and consistently with affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. Agriculture producers are intimately familiar with areas affected by the ISR Project and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and rangeland health for the planning area. It is

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imperative BLM staff continuously inform all livestock grazing permittees directly or indirectly affected of the issues, decisions, and resulting actions regarding this ISR Project.

We support compensatory mitigation discussions between the operator and livestock permittees to lessen the burden and reduce economic impacts to grazing permittees from this development. Such mitigation strategies and costs could include, but are not limited to: movement of livestock to an open allotment or pasture, monitoring of impacts including use of the Wyoming Rangeland Monitoring Guide, construction of water and range improvements on either public or private land, purchase or lease of additional grazing land to replace lands lost to grazing, and reimbursement to producers for loss of AUMs and pastures.

We strongly recommend the EIS includes a full and thorough social and economic impact analysis. Since grazing on public lands represents a vital economic value to agriculture producers and local communities, we specifically suggest the analysis includes the impacts upon livestock grazing in and adjacent to the planning area. The cumulative impacts of energy developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The evaluation of the loss or impaired ability of livestock grazing operations in the EIS is imperative.

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 EIS.

BLM should require timely and successful reclamation and mitigation. Reclamation and mitigation requirements and the consequences for energy developers failing to accomplish this reclamation and mitigation should be clearly stated in the EIS.

Congressional mandates, federal statutes, and regulations call for multiple use, and should be an integral part of the EIS. Moreover, the EIS should evaluate the impact of this project upon the intent expressed in 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."* The impacts upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of the ISR project upon food and habitat for domestic animals deserve the same degree of study and documentation.

Grazing is an essential tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for both wildlife and livestock. The EIS 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 management to achieve these positive effects.

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BLM's decisions should come from peer-reviewed science. The BLM needs to identify the science supporting their decisions and discussions regarding this project.

The EIS should insist BLM staff, grazing permittees, and private landowners work cooperatively. WDA recommends BLM develops a proposed alternative with flexibility to make the best site-specific, case-by-case decisions 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 action. We encourage continued attention to our concerns and we look forward to BLM including the WDA as a Cooperating Agency for all future meetings and development of alternatives.

Sincerely,


Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
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Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
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