



Wyoming
DEPARTMENT OF Agriculture

Matthew H. Mead, *Governor*
Jason Fearneyhough, *Director*
2219 Carey Ave. • Cheyenne, WY 82002
Phone: (307) 777-7321 • Fax: (307) 777-6593
Web: agriculture.wy.gov • Email: wda1@wyo.gov

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

May 30, 2014

Mrs. Kathleen Lacko, Assistant Field Manager
Bureau of Land Management
Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Dear Mrs. Lacko:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the Casper Bureau of Land Management Field Office's (BLM) and United States Forest Service, Douglas Ranger District (FS) proposed Environmental Impact Statement (EIS) and amendments to the Casper and Thunder Basin National Grasslands Land and Resource Management Plans (RMPs) in relation to the proposed Converse County Oil and Gas Project (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.

The following issues, specific to livestock grazing permittees, should be analyzed during the EIS process by the BLM and FS: decreased Animal Unit Months (AUMs) and the associated economic impact to permittees, increased off- and on-road traffic as well as an increased number of speeding vehicles which could pose a threat to livestock in the area and affect permittees ability to manage livestock, construction of new roads and modification of existing roads which could impact permittees, cut fences, opened gates, damaged range improvements, decreased palatability of forage due to road dust and development activities, unsuccessful reclamation and the associated impact to forage availability, introduction and spread of noxious weeds, "drift" or run-off of herbicides and the associated impacts on near-by forage, and the overall economic impact this project may have on permittees and their ability to maintain a viable operation.

Communication is a key component and the BLM/FS and oil and gas companies (O&G Companies) should talk with permittees early and often to ensure existing management practices experience minimal conflict and develop a plan to mitigate any identified conflicts. We also strongly encourage, and support, compensatory mitigation between affected grazing permittees and O&G Companies. We encourage O&G Companies and the BLM/FS to explore all possible alternatives to reduce conflicts affecting livestock, permittees and O&G Companies operations and personnel. This may include, but is not limited to: movement of livestock to other allotments, construction of range improvement and/or development of additional water wells on public or private land, voluntary paid non-use of allotments, and purchase or lease of additional grazing land to replace lands no longer available to grazing.

Reclamation is a key component of any project. Reclamation guidelines must be complete, realistic and fully implemented. Reclamation and mitigation requirements and the consequences of failure on the part of O&G Companies should be clearly stated and enforced by the BLM/FS.

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Many EISs are deficient in regard to identifying or analyzing social and economic impacts to grazing permittees imposed by development. We strongly suggest the EIS include a full and thorough social and economic impact analysis. Specifically, since grazing on public lands represents as vital economic value to agriculture producers and local communities, we recommend the analysis includes impacts upon livestock grazing and management in and adjacent to the planning area. This may include, but is not limited to: the value of one AUM, cost of reductions in AUMs or animal numbers to permittees, cost of failed reclamation and cost of changes in the vegetative composition or seral stage of the forage in the project area. In addition to its economic value, grazing represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic views and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. BLM/FS should include any loss of these values to permittees, members of the community and visitors in the analysis.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and should be an integral part of the assessments. 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."* (FLPMA, Sec. 102 (8)). The impact upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of this 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) positive effects of livestock grazing upon the environment and managed grazing 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.

We strongly encourage BLM/FS, and the O&G Companies to work closely and consistently with affected grazing permittees to address their concerns and recommendations. Moreover, it is imperative BLM/FS officials continuously inform all livestock grazing permittees who are directly or indirectly affected of the issues, decisions, and resulting actions regarding this proposal.

Peer-reviewed science should underlie BLM/FS's decisions. The BLM/FS must identify the science supporting their decisions and planning regarding this project. Decisions in the proposed plan should allow BLM/FS officials, grazing permittees and O&G Companies the opportunity to work cooperatively. BLM/FS should provide flexibility to ensure the best site-specific, case-by-case decisions are made throughout the life of this project.

In conclusion, we thank you for the opportunity to comment and look forward to reviewing the future EIS.

Sincerely,



Jason Fearneyhough
Director

JF/jb

CC: Governor's Policy Office
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Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation

Wyoming Game and Fish Department
Wyoming State Grazing Board
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