



June 16, 2015

Scott Benson
Wyoming Army National Guard
Construction & Facilities Management Office
5410 Bishop Blvd.
Cheyenne, WY 82009-3320

Dear Mr. Benson,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Camp Guernsey Integrated Natural Resource Management Plan (INRMP), Programmatic Environmental Assessment (EA) Inter-Agency Coordination and Public Scoping.

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 plan 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.

WDA appreciates the opportunity to provide scoping comments for the Draft EA. We have reviewed and commented on the INRMP and offer the following comments to include in the EA:

We support Wyoming Army National Guard (WYARNG) developing a Rangeland Management Plan as an Appendix to the INRMP. This Plan should remain flexible and integrate adaptive management practices. We support the continuance of domestic livestock grazing. We encourage WYARNG develop goals and objectives to include the recent purchases of private land reflecting the new project area boundary.

We recommend gathering baseline data including the Ecological Site Descriptions, prior to making major management decisions. The INRMP states WYARNG will determine "standards and guidelines," which is typically associated with Bureau of Land Management (BLM) Rangeland Health Assessments. While we believe standards and guidelines provide an overall indication of rangeland health, we highly recommend WYARNG refrain from using this process unless there is adequate data to make determinations.

Due to mixed landownership, including BLM and Office of State Lands and Investments (OSLI) lands, we emphasize the importance of WYARNG working closely with partners to collect data with the intent of issuing grazing permits. If WYARNG modifies a process, such as "standards and guidelines," it is imperative the data collected is acceptable by BLM and OSLI prior to implementation.

Due to WYARNG utilizing livestock grazing as a vegetative management tool, including reducing wildfire, the INRMP should not include or analyze blanket statement such as "Utilization of forage species will not exceed

Equal Opportunity in Employment and Services

BOARD MEMBERS

Jana Ginter, *District 1* • James Rogers, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*
Bryan Brost, *District 6* • Kevin Schieffer, *District 7*

YOUTH BOARD MEMBERS

Kendall Roberts, *Southeast* • Richard Schlenker, *Northwest* • John Hansen, *Southwest* • Cameron Smith, *Northeast*

50%." In situations where training areas and fire hazard are a top priority, grazing will exceed the 50% utilization level to achieve objectives. We ask WYARNG to remove this limitation to allow flexibility throughout the life of the INRMP. We recommend developing utilization levels once goals and objectives are set for each permit.

WDA also recommends WYARNG determine proper stocking rates once data is collected and analyzed. We suggest working closely with grazing permittees to cooperatively develop vegetative management objectives on a yearly basis, while considering changes in season of use, stocking rates, livestock management practices, and range improvement projects.

Specifically in the Scoping letter it states, *"The WYARNG has made a preliminary determination that implementation of this INRMP will not cause significant impacts on the following resources: Air Quality, Noise, Geology..."* WDA cautions WYARNG from the interchangeable use of terminology, such as "significant," which we also commented on earlier on the INRMP document. Significant impacts to resources will trigger an Environmental Impact Statement. We recommend a similar determination to BLM, which is "Not Present" or "No Impact."

We support WYARNG in their efforts to analyze a new INRMP. We look forward to working closely with WYARNG through the process. Please feel free to contact Justin Williams, Senior Policy Analyst at 777-7067 if you have questions or concerns.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts
Wyoming Game and Fish Department