



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

June 6, 2017

Bureau of Land Management
Pinedale Field Office
Attn: Brian Roberts
1625 West Pine Street
PO Box 768
Pinedale, WY 82941

Dear Mr. Roberts,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Riley Ridge Development Environmental Analysis (EA) in the Bureau of Land Management (BLM) Pinedale Field Office.

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.

The WDA offers the following brief comments to consider in the EA and final decision.

Water Resources and Wetlands: page 2 -19

"Willows will be planted using BLM-approved and US Forest Service-approved methods in riparian and wetland areas"

Comment: WDA is unaware of specific plans or documents regarding willow planting. We recommend identifying and referencing specific plans including methodology. Additionally, someone could interpret the statement as all riparian areas will have willows planted. We recommend including language to only plant willows where baseline data indicates the site previously had them as well as including the ecological sites. See also Appendix D 4.0 Interim Reclamation.

Pronghorn: page 3 – 35

"However, a north to south pronghorn migration corridor is crossed by an existing access road to the east of the RRD Project area."

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Comment: WDA strongly opposes BLM including language for a pronghorn migration corridor. The Wyoming Game and Fish Department (WGFD) Ungulate Migration Corridor Strategy guides the approval of corridors for ungulates. As of today, no pronghorn migration corridors are in place. We request BLM remove any language referring to designated migration corridors other than those identified by the WGFD and approved by their Commission.

Pygmy Rabbit: page 3-50

“Destruction of big sagebrush habitat by overgrazing, manipulation for improved livestock forage, and conversion to pasture or cropland has been responsible for population declines and isolation of local populations (Keinath and McGee 2004). The pygmy rabbit’s strict habitat requirements serve to exacerbate habitat constraints from sagebrush loss and degradation.”

Comment: The WDA is very concerned to see BLM’s polarized perspective by identifying livestock grazing management and agriculture as the causal factor for the demise of the pygmy rabbit. All such statements must be removed.

We offer the following direct quotes from the Species Assessment for Pygmy Rabbit, Keinath and McGee 2004¹, which provide a more neutral and comprehensive perspective to the current habitat conditions and populations for pygmy rabbit.

- **“It is unknown how the landscape-level pattern of sagebrush affects pygmy rabbit population (page 10).”**
- **“Interestingly, this type of sagebrush habitat may not have been more prevalent or contiguous before human settlement (Dobler and Dixon 1990). Thus, pygmy rabbits may have coped with such fragmentation for centuries. However, the local distribution of these habitat patches has likely shifted across the landscape in response to disturbance (e.g. fire, flood, land-use change) and weather patterns, and rabbit distribution has analogously shifted. Moreover, it may be that currently documented declines are a delayed result of a long-term trend in sagebrush habitat that was occurring before human settlement and has been accelerated by that settlement. There has been no research that would allow us to make this determination. (page 10)”**
- **“Sensitivity to habitat alteration: Reliance on specific habitat components combined with dispersal restriction makes pygmy rabbits potentially susceptible to changes in the structure of habitat (e.g., from overgrazing, invasive weeds, fire, or sagebrush eradication) and the fragmentation of habitat (e.g., from dispersed resource extraction activities) (Katzner 1994, Dobler and Dixon 1990, Holecheck 1981) (page 23).”**
- **“These habitat changes are primarily caused by conversion of shrub-steppe to other uses (e.g. cropland, urban and rural development, and petroleum development), sagebrush removal for cattle grazing, and change in the fire regime. The impacts of livestock grazing on pygmy rabbits are likely to be negative on balance (Table 2), but this is somewhat unclear and requires further study (page 24)”**
- **“Environmental stochasticity can result in variation in food resources, disease vectors, predators, parasites and climate, all of which may have an affect on the persistence of pygmy rabbit populations (page 25).”**

As we have clearly indicated, the BLM has excluded numerous other factors which potentially and negatively impact pygmy rabbit. WDA strongly urges BLM revise the EA in its entirety to ensure the analysis does not single out livestock grazing and agriculture as the causal factor for pygmy rabbit declines.

Livestock Grazing: 3-76 and 4 - 83

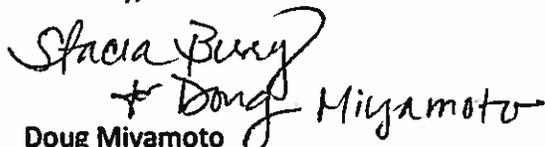
Comment: WDA appreciates Table 3 – 19 identifying the acres Riley Ridge project will impact on each grazing allotment. We ask BLM to consider the cumulative impacts on 4 - 83 to available forage from current and past disturbances. The Table 3 – 19 merely includes the number of acres in each allotment this project impacts, but we know other existing projects in the immediate area are likely still under disturbance. We do not believe the EA provides an adequate picture of how livestock grazing permittees are negatively impacted by the Riley Ridge project.

Final Reclamation 4.5: Appendix D.

Comment: WDA would request BLM clarify the project applicant should work towards final reclamation on permanent infrastructure such as pipelines.

We appreciate the opportunity to provide comments on this EA. We look forward to working closely with you as a Cooperating Agency. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

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
WY Association of Conservation Districts
Wyoming Game and Fish Department
WY County Commissioners Association

¹ Keinath, D.A. and M. McGee. 2004. *Species Assessment for Pygmy Rabbit (Brrachylagus Idahoensis) in Wyoming*. Prepared for the Bureau of Land Management, Wyoming State Office, Cheyenne. Wyoming.