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

July 13, 2020

Heather Schultz  
Project Manager  
Bureau of Land Management  
5353 Yellowstone Road  
Cheyenne, WY 82009

Dear Ms. Schultz,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Draft Resource Management Plan Amendments and Environmental Impact Statement regarding Bureau of Land Management (BLM) Wyoming's Cody, Worland, Buffalo, Casper, Lander, Pinedale, Kemmerer, Rawlins and Rock Springs Field Offices to designate pipeline corridors as proposed by the Wyoming Pipeline Corridor Initiative and the State of Wyoming (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 affects our agriculture industry, our natural resources, and the welfare of our citizens, it's 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 supports the plan to amend the RMP's in all nine BLM Field Offices. The development of defined pipeline corridors across BLM and private lands will help utilize the valuable natural resources in our state while still helping to protect the natural, agricultural and social uniqueness of our great state.

WDA encourages the BLM Field Offices to work closely with pipeline development companies, and through the site-specific NEPA process, to ensure that private landowners' concerns and the interests of the various publics are met. This includes any road construction, reclamation and pipeline placement during the life of the project.

WDA appreciates the BLM recognizing the potential impact to livestock grazing and agriculture producers in the over 1,900 mile proposed corridor area. There are a number of specific impacts to agriculture the BLM must analyze in the EIS, or ensure they are included in the site-specific NEPA process: increased off- and on-road traffic, increased number of speeding vehicles in the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased Animal Unit Months (AUM's), 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 management operations. Many of these issues are broadly covered in the DEIS document, however, because of the broad scale and complexity of this project BLM must ensure that they are more thoroughly documented in each specific area when projects are authorized.

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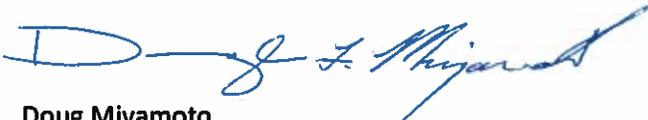
We strongly encourage BLM staff and pipeline development companies to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding these proposed corridors. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. We highly recommend that during the site-specific NEPA process developers and BLM officials seek and address the concerns and recommendations of these stewards of habitat, forage and rangeland health.

Livestock grazing represents a vital economic value to agriculture producers and to local communities. Additionally, livestock grazing contributes irreplaceable environmental and social values, preservation of open space, scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. This corridor project will have a direct impact on livestock grazing as pipelines are built and maintained. The BLM should analyze any loss or impact to these important environmental, historical and social values of livestock grazing.

The WDA insists the BLM plan for, oversee, and ensure successful reclamation and mitigation occurs in all new/temporary disturbances in the project corridor. This also includes monitoring and eradicating invasive and noxious weeds until desired vegetation is established. The BLM must analyze and mitigate increased costs and reduced revenues on disturbed land for private landowners and grazing permittees in the final EIS and Record of Decision along with the specific impacts during the site specific NEPA process.

We appreciate the opportunity to comment on the Draft Resource Management Plan Amendments/Environmental Impact Statement for the Wyoming Pipeline Corridor Initiative. We encourage continued attention to our concerns and look forward to serving as a cooperating agency on the proposed project and being involved in future proposed actions and decisions. We also ask to be notified of any future site-specific NEPA documents developed for this project.

Sincerely,



Doug Miyamoto  
Director

DM/sm

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