



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

**November 4, 2010**

**Thomas Bills, Buffalo RMPA Team Leader  
Buffalo RMP Amendment/Fortification Creek EA  
BLM, Buffalo Field Office  
1425 Fort Street  
Buffalo, WY 82834**

**Dear Mr. Bills:**

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Draft Buffalo Resource Management Plan Amendment for the Fortification Creek Planning Area and Environmental Assessment (RMPA/EA) developed by the Bureau of Land Management Buffalo Field Office (FO).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed RMPA/EA 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 the opportunity to express pertinent issues and concerns.

#### **4.3.4 Vegetation Resources, page 4-39:**

The RMPA/EA currently states that authorized livestock grazing use will not be increased. The WDA strongly recommends that this be changed to "permitted use" to allow flexibility in management of livestock grazing. In addition, we recommend defining "authorized use" and "permitted use."

#### **Design Features – Livestock Grazing Management**

The WDA strongly recommends that the Buffalo FO add design features specific to livestock grazing management into the Fortification Creek RMPA/EA. Several oil and gas development projects throughout the state have successfully implemented features that reduce potential stress on livestock producers and livestock. We recommend adding the following to the appendices to increase communication and reduce impacts on livestock grazing management due to coal bed natural gas (CBNG) development:

- Hold annual meetings with grazing permittees to discuss project-specific impacts and required mitigation. CBNG operators will notify affected parties of proposed drilling and maintenance schedules during these meetings. Throughout the life of the project, if there are substantial changes additional meetings with livestock grazing permittees will be held.
- Provide livestock grazing permittees a map showing the location of all new well pads and access roads.

#### **BOARD MEMBERS**

Juan Reyes, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • Jim Bennage, *District 4* • Joe Thomas, *District 5*  
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

#### **YOUTH BOARD MEMBERS**

Patrick Zimmerer, Southeast • Dalin Winters, Northwest • John Hansen, Southwest • Bridget Kukowski, Northeast

11/9/2010

Page 2 of 2

- Mitigate impacts to existing livestock water such that there are no adverse impacts to livestock management, water availability, or water quality.
- CBNG operators will repair fences, cattleguards, gates and natural barriers that are damaged by development actions. The design and installation of fences, cattleguards, gates and natural barriers will comply with current BLM construction regulations and standards.
- Control fugitive dust on all primary access roads and heavily used resource roads by utilizing BLM approved treatments or dust suppressants. CBNG operators will require contractors and employees to obey speed limits and support local law enforcement officials in enforcing speed limits to reduce fugitive dust concerns and livestock deaths, as well as for human health and safety reasons.
- The BLM, in coordination with livestock permittees, will monitor livestock movements and impacts occurring to livestock from roads or disturbance from construction and development activities. CBNG developers, in consultation with the BLM, will take appropriate and reasonable measures to mitigate any adverse impacts occurring to livestock or livestock grazing management.

In conclusion, the WDA appreciates the opportunity to comment on the proposed actions. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Handwritten signature of Jason Fearneyhough in blue ink.

Jason Fearneyhough  
Director

JF/jc

CC: Governor's Planning Office  
Rocky Mountain Farmer's Union  
Wyoming Association of Conservation Districts  
Wyoming Board of Agriculture  
Wyoming Farm Bureau Federation  
Wyoming Game and Fish Department  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association