

Wyoming Department of Agriculture

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Dave Freudenthal, *Governor*
John Etchepare, *Director*

The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.
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November 25, 2008

Mary H. Peterson
Forest Supervisor
Medicine Bow National Forest
2468 Jackson Street
Laramie, WY 82070

RE: Powerline Clearing Project – Carbon Power and Light, Inc.

Dear Ms. Mary Peterson:

Following are the comments of the Wyoming Department of Agriculture (WDA) regarding the proposal by Carbon Power and Light, Inc. for the Powerline Clearing Project located within the Medicine Bow-Routt National Forest (MBRNF).

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We understand the need for an immediate and proactive action regarding the proposed tree clearing along the powerline corridor due to the mountain pine beetle and spruce bark beetle epidemic occurring in the MBRNF. However, the immediate and potential secondary effects of the proposed project will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and adjacent to the proposed project area. For this reason, we offer the following comments.

The immediate impact on livestock grazing is the decrease in Animal Unit Months (AUMs) that will occur in active treatment areas, along with other disturbances associated with tree clearing activities. Although the effects from this surface disturbance are considered temporary, it must be analyzed as an immediate impact to livestock and livestock management operations by the MBRNF.

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We also believe the following secondary impacts affecting livestock grazing are as follows and should be evaluated in the final environmental assessment:

- Creates areas for invasive and noxious weeds to establish in disturbed areas.
- Increase vehicle traffic impacting livestock movements, and potential injury and death due to collisions.
- Loss of palatable vegetation due to increased dust on vegetation.
- Gates being left open allowing for livestock to move into unwanted areas.
- Potential increase in off-road travel, directly impacting vegetation and compaction of soils.
- Surface disturbing activities (including burn/slash piles, grading, skid trails, etc.).
- Felled trees that are left in place and not removed will cause barriers and loss of available vegetation.
- Direct loss of vegetation and AUMs during the proposed action.

Although, the proposed action will undoubtedly cause temporary impacts to livestock grazing, the clearing and maintaining of the utility corridor is ultimately considered a beneficial effect as long as proper mitigation and reclamation is incorporated into the plan and environmental document. The beneficial effects considered would be providing the opportunity for vegetation to establish in cleared areas, the maintaining of the utility corridor assisting livestock movements, and the removal of hazardous trees.

Timely and successful reclamation and mitigation are necessary and we insist they be required. It is imperative all disturbed areas be reclaimed and re-seeded with an approved seed mix upon completion of the activity. This includes the monitoring and eradication of invasive and noxious weeds in all disturbed areas until desired vegetation is established. Mitigation and reclamation for these impacts must be included in the final decision. These detrimental impacts also increase costs and reduce revenues for grazing permittees in this area. The costs and decreased revenues are not fully analyzed in the majority of environmental assessments; they must be thoroughly analyzed and mitigated in the environmental document.

We strongly encourage the Forest Service staff to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding the subject area. Agriculture producers are intimately familiar with the areas potentially affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and rangeland health for the subject area. We highly recommend that during the planning process the Forest Service seek and address the concerns and recommendations of

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these stewards of habitat, forage, and rangeland health. Moreover, it is imperative that Forest Service officials continuously inform all livestock permittees who are directly and indirectly affected by the issues, decisions, and resulting actions regarding the proposed project.

Decisions in the proposed plan should allow Forest Service officials and grazing permittees the opportunity to work cooperatively. We urge the MBNF to ensure flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens throughout the life of this plan should also be addressed.

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

Sincerely,



John Etchepare
Director

JE/cw

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