



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

February 1, 2011

David Simons, Atlantic Rim Project Coordinator  
Bureau of Land Management  
Rawlins Field Office  
PO Box 2407  
Rawlins, Wyoming 82301  
Attn: Catalina POD G&I

Dear Mr. Simons:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Environmental Assessment (EA) and Findings of No New Significant Impact (FONNSI) for the Catalina POD G&I (Project) within the Atlantic Rim Natural Gas Project (ARNGP).

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 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 provide us the opportunity to express pertinent issues and concerns.

The WDA understands the Project is tiered under the ARNGP - Record of Decision (ROD) and Environmental Impact Statement of 2007. The EA/FONNSI should clearly state or attach the appropriate appendices to this document so Industry and the public know exactly what is required of the Project. We suggest including Appendix A – Reclamation Plan, Appendix B - Atlantic Rim Natural Gas Project Performance-Based Monitoring and Best Management Practices and Appendix C – Operator-Committed Practices.

The EA must also recognize the ROD for the ARNGP created a set of Performance –Based Management Goals, which states the following:

*"...The environmental document and its related decision document will specify required BMPs, COAs, or other protective measures as detailed in the paragraph above to be included in the authorization.*

*The BLM will use a performance-based management approach as part of the adaptive management process, which includes four primary elements.*

- 1. Performance Goals: describes the conditions that the BLM and Operators will attempt to achieve (See Performance Goals in the following section).*
- 2. Performance Requirements: an extensive array of BMPs (ROD, appendix B), COAs, and protective measures used to help achieve the Performance Goals.*
- 3. Performance-Based Monitoring: monitoring efforts to measure the degree of success the Performance Requirements have in achieving Performance Goals (See Monitoring, Reporting and Adaptive Management).*
- 4. Adaptive Management: additional mitigation or adaptive techniques to help achieve Performance Goals."*

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Best Management Practices (BMPs), Conditions of Approval (COAs) and other protective measures are lacking throughout the EA as the ROD clearly requires (page 19).

In addition, the ROD states, "Operators are responsible for demonstrating successful achievement of Performance Goals." However, there is little to no mention of the performance goals in the EA.

The Performance Goals are as follows:

Migration Routes	maintain functional migration routes through or around development areas
Big Game Crucial Winter Range	provide an adequate amount of suitable, undisturbed crucial winter range for big game animals
Sage and Sharp-Tailed Grouse	provide well-dispersed sage-grouse breeding, nesting, brood rearing, and winter habitat
Muddy Creek Sensitive Fish	maintain adequate water quality, water quantity, species distribution, and aquatic habitat components
Shrub-Dependent Song Birds	assure occupied habitat for shrub-dependent song birds is well distributed throughout the project area
Riparian	ensure no net loss of native riparian habitat/vegetation
Grazing	maintain adequate and sustainable food and habitat for domestic animals
Range Condition	maintain range condition or improve range condition towards potential for the ecological site
Livestock Safety	minimize deaths and injuries of livestock due to development and operational activities
Range Improvements	minimize damage to range improvements, gates, cattle guards, water sources, and other livestock grazing management improvements
Standards and Guidelines	manage to meet Wyoming Healthy Rangeland Standards
Sites	maintain viable, site-stabilizing native plant growth
Species Composition	maintain a range of species composition, diversity, cover, and production equal to pre-disturbance levels
Weeds	maintain weed-free sites

The WDA does not believe the EA adequately analyzes cumulative impacts to livestock grazing and other associated resources, nor does it develop appropriate BMPs, COAs or other protective mitigation measures for impacts to livestock grazing or other range resources. We do, however, agree the Project does not create any additional significant impacts that were not previously discussed in the ROD for ARNGP.

Specific examples in the EA are as follows:

- Page 17 of the Transportation Section (Effects common to all alternatives) states traffic activity would increase with speeds increasing by 15-25 mph over current conditions. However, it does not mention the effects dust will have on vegetation, air quality or livestock health or how Industry will mitigate these effects. Appendix B – Transportation Section states the following: *"Operator responsibilities for preventive and corrective maintenance of roads in the ARPA would extend throughout the duration of the project and include blading; cleaning ditches and drainage facilities; dust abatement; control of noxious and invasive species; maintenance of fences, gates, and cattle guards; and other requirements as directed by the BLM, Wyoming Department of Transportation (WYDOT), Carbon County, and private landowners (FEIS chapter 4)."* Industry should implement these mitigation measures and dust abatement practices throughout the transportation network.
- Additional mitigation that should be implemented in the Transportation Section of this document is the posting of speed limits and the strict adherence to these speed limits as stated in Appendix B - Livestock Grazing/Range Management Section, *"Operators and their contractors will observe and promote adherence to speed limits in the*

*project area, and erect signs in lambing/calving areas, shipping pastures, or adjacent to working corrals to warn vehicle Operators (FEIS, section 4.6.5.4)."*

In the Rangeland Resources Section (page 30), the WDA supports Alternative A over the Proposed Action. Alternative A would avoid the construction of a new road connecting the Project to Wyoming Highway 789. We believe this road would fragment a large, relatively undeveloped area currently utilized for grazing and increase the potential for livestock harm. In addition, the proposed new road (Proposed Action Alternative) would directly impact a livestock water source, create an increased risk for vehicle collisions with livestock, and increase disturbance to livestock in an area of high livestock use. The WDA strongly encourages the elimination of the Proposed Action Alternative. We also livestock use is monitored in this area to analyze the need for additional livestock water sources as adaptive management.

Finally, the EA lacks a Cumulative Impacts Section. The WDA recommends a cumulative impact analysis as required under the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act. The cumulative impacts analysis should analyze all the impacts that have occurred throughout the ARNGP area. The EA proposes approximately 316-326 acres of disturbance for this Project, but how many acres are already disturbed adjacent to the Project area? How many acres are already disturbed in the Doty Mountain Allotment? These are unknown to the reviewer and should be answered in a Cumulative Impact Section. Not only are we concerned about the direct impacts from this Project, but also all the impacts having potential to affect agriculture practices and livestock grazing operations within the ARNGP area.

We appreciate the opportunity to comment on the EA and FONNSI for the proposed Project. We encourage continued attention to our concerns and we look forward to hearing about and being involved in future proposed actions and decisions.

Sincerely,



Jason Fearneyhough  
Director

JF/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  
Wyoming Association of Conservation Districts  
Wyoming State Grazing Board  
Rocky Mountain Farmers Union