

Wyoming Department of Agriculture

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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.



Dave Freudenthal, *Governor*
John Erchepare, *Director*

August 28, 2008

Heather Nino, Realty Specialist
Rawlins Field Office
Bureau of Land Management
1300 North Third Street
Rawlins, WY 82301

Dear Heather Nino:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Notice of Intent (NOI) regarding the proposed Chokecherry and Sierra Madre Wind Energy Project Environmental Impact Statement (EIS) by the Rawlins Field Office of the Bureau of Land Management.

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.

This project will impact grazing permittees, agriculture producers, landowners, as well as our natural resources, both in and near the proposed 98,500 acre project area.

After reviewing the NOI, it is apparent livestock grazing was not considered as an "Identified Resource Management Issues and Concerns." The following are specific negative impacts upon livestock grazing needing analyzed in the EIS: increased off- and on-road traffic, increased number of speeding vehicles, construction of new roads and modifications to existing roads, increased number of vehicles in the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased Animal Unit Months (AUMs), 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.

It is important to recognize and analyze the cumulative impacts the proposed project will create with the other major energy development projects occurring in the vicinity of the project (Atlantic Rim, Continental Divide-Creston, and numerous other major wind energy projects). The cumulative impacts occurring in the Rawlins Field Office area of operations is a significant concern to livestock grazing.

We strongly encourage the BLM officials to keep surrounding landowners and affected public land grazing permittees informed and to cooperatively work with them, learn their

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concerns and listen to their recommendations regarding impacts the proposed project will have in the project area. Agriculture producers are intimately familiar with areas 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 planning area. It is imperative the BLM officials coordinate with all livestock grazing permittees who are directly or indirectly affected by the issues, decisions, and resulting actions regarding this proposal.

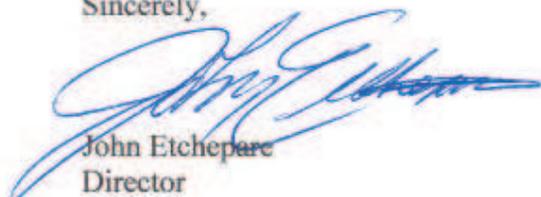
Grazing on public lands represents a vital economic value to agriculture producers and to local communities. In addition to its economic value, grazing represents irreplaceable environmental and social values, contributing to the preservation of open space, scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss or impacts to these important environmental, historic, and social values of livestock should be included in the analysis.

We insist timely and successful/performance based reclamation and mitigation occur for the proposed project. It is imperative for all new/temporary roads and disturbed areas be reclaimed and impacts minimized. This includes the monitoring and eradication of invasive and noxious weeds in all disturbed areas until desired vegetation is established. The Final EIS and Record of Decision (ROD) must thoroughly analyze and mitigate increased costs and reduced revenues for grazing permittees in the project area. The final decision must include mitigation and performance based reclamation for all impacts.

Decisions in the proposed plan should allow BLM officials and grazing permittees the opportunity to work cooperatively. We urge the Rawlins Field Office for flexibility in making the best site-specific, case-by-case decisions that are in the best interests of its citizens and the various affected resources.

In conclusion, we appreciate the opportunity to comment on the NOI for the proposed wind energy project. We encourage continued attention to our concerns and we look forward to being a cooperator with the proposed project and 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