

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.

July 1, 2008

Ms. Pam Olson, Assistant Field Manager
BLM, Lander Field Office
1335 Main Street
P.O. Box 589
Lander, WY 82520-0589

Dear Ms. Olson:

Following are our comments pertaining to the Scoping Notice for the proposed Environmental Impact Statement (EIS) for the Gun Barrel, Madden Deep, and Iron Horse Natural Gas Development Project (GMI Project) by the Lander Field Office of the Bureau of Land Management (BLM).

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, and other citizens, as well as our natural resources, both in and near this 147,335-acre project area. For these reasons, we are making the following comments.

Following are some specific individual effects 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, destroyed cattle guards, increased number of vehicles in the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased AUMs and pastures for grazing, 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 operators and livestock management operations.

We strongly encourage BLM staff and commercial operators to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. 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 the individual and cumulative impacts upon wildlife and livestock, as well as rangeland health for the

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planning area. We highly recommend that during the planning process energy development operators and BLM officials seek and address the concerns and recommendations of these stewards of habitat, forage, and rangeland health. Moreover, it is imperative that BLM officials continuously inform all livestock grazing permittees who are directly or indirectly affected of the issues, decisions, and resulting actions regarding this proposal.

The impacts of the GMI project will definitely increase costs and decrease revenues for grazing permittees. The accumulated impacts of this and nearby projects could jeopardize the continued existence of grazing operations in this area. The individual and cumulative impacts and the proposed remedies need to be thoroughly identified and evaluated in the EIS.

We support compensatory mitigation discussions between gas operators and livestock permittees to lessen the burden, livestock stress, and economic impacts to grazing permittees from this development. Such mitigation strategies and costs could include, but are not limited to, the following: movement of livestock to an open allotment or pasture, purchase of hay in lieu of allotment use, monitoring of development impacts including use of the Wyoming Rangeland Monitoring Guide (August 2001), construction of water and range improvements on either public or private land, purchase or lease of additional grazing land to replace lands lost to grazing, and reimbursement to producers for loss of AUMs and pastures.

Any off-site mitigation resulting from this project will also have a direct impact on livestock grazing in those off-site mitigation areas. These areas have active grazing permits and off-site mitigation will likely cause a decrease in AUMs, loss of pastures, increases in costs, and decreases of revenues. It is important that compensation is similarly awarded to grazing permittees who will be affected by off-site mitigation projects.

Many environmental impact studies are deficient in identifying or analyzing social and economic impacts imposed by proposed energy developments. We strongly recommend that the EIS includes a full and thorough social and economic impact analysis. Since grazing on public lands represents a vital economic value to agriculture producers and local communities, we specifically suggest that that analysis includes the impacts upon livestock grazing in and adjacent to the planning area. The cumulative impacts of energy developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The loss or impaired ability of livestock grazing operations needs to be evaluated in the EIS.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study and the social impacts analyzed in the EIS.

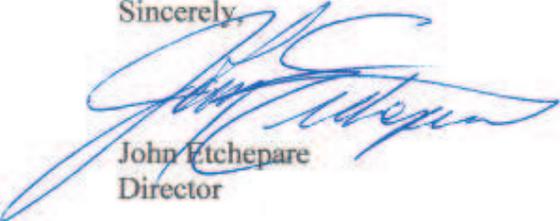
Timely and successful reclamation and mitigation are needed and should be required. Reclamation and mitigation requirements and the consequences for energy developers failing to accomplish this reclamation and mitigation should be clearly stated. Congressional mandates, federal statutes, and implementing regulations call for multiple use, and should be an integral part of the assessments. Moreover, the EIS should evaluate the impact of this project upon the intent expressed in the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. The impacts upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of the GMI project upon food and habitat for domestic animals deserve the same degree of study and documentation. Grazing is an essential tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for both wildlife and livestock. The EIS needs to include 1) these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives and 2) the impacts of this project on limiting the ability of livestock grazing to achieve these positive effects.

Peer-reviewed science should underlie decisions that are made. The EIS needs to identify the science that supports the decisions and discussions regarding this project.

Decisions in the proposed plan should allow BLM officials, grazing permittees and private landowners the opportunity to work cooperatively. 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 scope of the proposed actions. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



John Etchepare
Director

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CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture