

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 Etchepare, Director

December 19, 2008

Teri Deakins, EPS
Rock Springs Field Office
Bureau of Land Management
280 Highway 191 North
Rock Springs, WY 82901

Dear Teri Deakins:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the Scoping Notice regarding the proposed White Mountain Wind Energy Project Environmental Assessment (EA) proposed by Teton Wind, LLC. and the Rock Springs Filed Office (RSFO) 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 you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

This proposed project will impact grazing permittees, agriculture producers, landowners, as well as our natural resources, both in and near the proposed 13,145 acre project area.

We appreciate the RSFO's effort in recognizing potential impacts on grazing and rangelands, however, the Scoping Notice fails to identify all the potential impacts to livestock grazing and surface disturbance. The following are specific negative impacts upon livestock grazing needing analyzed in the EA: 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, 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 also important to recognize and analyze the cumulative impacts the proposed project will create with other major development projects occurring in the vicinity of the project area. The cumulative impacts occurring in the RSFO area of operations are a significant concern to livestock grazing permittees.

The WDA is concerned the Scoping Notice lacks specific details of the project, such as, acres of surface disturbance, construction schedule, etc. The total number of acres disturbed for both temporary impacts and permanent impacts is not identified in the Scoping Notice.

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This information is extremely valuable for evaluating the potential significance of the surface disturbing activities. Another area of concern in the Scoping Notice is “phased development.” The WDA requests more details regarding construction schedule or a completion date for the project. We support phased development as long as the development is well planned and attempts to minimize impacts to all resources. We suggest installation of all the main infrastructure facilities for the project area occur in the first phase of development, so mitigation and reclamation can begin immediately along roads and other impacted areas. This would reduce future impacts on new development areas and reclaim areas for use by livestock grazing operations sooner. Lastly, the Scoping Notice fails to mention the operation and maintenance (O&M) activities occurring during the life of the project. The O&M activities would create impacts throughout the life of the project and need to be included in the analysis for the EA.

The WDA supports the private landowner’s right to choose to have wind energy projects developed on their private lands, however, we strongly encourage the BLM officials to keep surrounding landowners and affected public land grazing permittees informed of project details and to cooperatively work with them, learn their concerns and listen to their recommendations regarding impacts the proposed project will have on the resources and operations. 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 mitigation and reclamation occur for the proposed project. It is imperative to reclaim new and temporary roads and disturbed areas. This includes the monitoring and eradication of undesirable weeds in all disturbed areas until desired vegetation is established. The EA must thoroughly analyze and mitigate increased costs and reduced revenues for grazing permittees in the project area. The final decision must ensure successful mitigation and reclamation occurs for all impacts.

Decisions in the proposed Plan of Development should allow BLM officials and grazing permittees the opportunity to work cooperatively. We urge the RSFO to allow 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.

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In conclusion, we appreciate the opportunity to comment on the Scoping Notice 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

