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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.

March 29, 2022

BLM Rock Springs Field Office
High Desert District
c/o Lacey Anderson
280 Highway 191 North
Rock Springs, WY 82901

Dear Ms. Anderson,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Bureau of Land Management, Rock Springs Field Office (BLM) proposal to construct a Range Improvement Project in the Bush Rim grazing allotment.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

We are in support of the BLM analyzing the Kinch McKinney well and troughs for improving distribution and management of livestock across the Bush Rim grazing allotment. We appreciate the inclusion of Wyoming Standards for Healthy Rangelands and ensuring the Environmental Assessment (EA) analysis the potential impacts, but also potential benefits of the project to the six resource standards. The EA should compare the benefits of the Proposed Action with No Action Alternative.

We fully support the BLM moving forward with this project. WDA would encourage BLM to identify and analyze any other similar water well projects in the project area under a single EA. We support streamlining the National Environmental Policy Act process and the ability to project into the future, beyond when only immediate funding is available. This reduces the lag for future projects when funding is available for additional projects.

The Scoping Notice identified issues section preliminarily conveys potential concerns with sage-grouse nesting habitat and perch sites for predators. WDA urges BLM to refer to Appendix G, Exempt ("DE MINIMIS") Activities of the State of Wyoming, Greater Sage-grouse Executive Order 2019-3. Appendix G, number 5 states: "Drilling and outfitting of agricultural water wells or development of other agricultural water sources (including tank installation, pumps, and agricultural water pipelines), more than 0.6 miles from the perimeter of an occupied lek. Construction within 0.6 miles is allowed from July 1 through March 14, after a habitat evaluation has occurred, and provided development does not occur on the lek. New tanks shall have escape ramps." We support the BLM mitigating the well site for predator perch sites, along with the inclusion of bird escape ramps as identified in the Scoping Notice.

Finally, WDA urges BLM to analyze the potential use of the Kinch McKinney water well and troughs by wild horses outside of the nearby Great Divide Basin Herd Management Area. Wild horse use of the well, could negatively impact the livestock grazing permittee and associated resources.

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Kinch McKinney Water Well

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We appreciate the opportunity to provide input into this preliminary project and further request the ability to cooperatively review and work with the BLM prior to the Decision Record. We look forward to working with your staff on this project. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto
Director

DM/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
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