



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.

April 8, 2014

Ms. Jeanette Timm
Project Coordinator
Black Hills National Forest
Bearlodge Ranger District
101 S. 21st Street
Sundance, WY 82729-0680

Dear Ms. Timm:

Following are the Wyoming Department of Agriculture (WDA) scoping comments pertaining to the United States Department of Agriculture Forest Service (FS) Bearlodge Ranger District proposed Plan of Operations and Environmental Impact Statement (EIS) for the Bear Lodge Project (Project).

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, appeals and objections and continue to provide the opportunity to communicate pertinent issues and concerns.

This Project will likely impact livestock grazing permittees, agricultural producers, landowners and other citizens, as well as our natural resources in and near the Project area. We urge the FS to analyze the individual effects to livestock grazing permittees in the EIS. This would include: large areas fenced off from grazing, changes in Animal Unit Months, ground and surface water quality, increased traffic and number of speeding vehicles which could kill or injure livestock, construction of new roads and modifications to existing roads, cut fences, opened gates, damaged range improvements, dust impacts to forage resources and animal health, open mine areas that may pose risks to livestock, unsuccessful reclamation of disturbed areas, noxious weeds, and other detrimental impacts associated with the Project to livestock producers and their operations.

We encourage the FS and members of Rare Element Resources, Inc. to work closely with affected permittees to learn of their concerns and recommendations regarding this Project. These producers are intimately familiar with the Project area and possess priceless on-the-ground knowledge. We support compensatory mitigation discussions between affected permittees and Rare Element Resources, Inc. to lessen the burden of this Project. This may include moving animals to open allotments, monitoring impacts of the Project closely, construction of range improvements and purchase or lease of grazing lands to replace lands lost during Project completion.

Many EISs fail to sufficiently analyze the economic impacts that a project may have on grazing permittees. We strongly recommend that the socio-economic analysis include the loss or impaired ability of grazing permittees to operate at full potential. This should be evaluated in depth and impacts to the local and state economy should be included.

In addition to its economic value, livestock grazing also represents irreplaceable environmental and social values, a contribution to the preservation of open spaces, scenic views and the traditional image of the historic rural landscapes of Wyoming and the American West. The FS should include any loss of these important values in the EIS.

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Additionally, the FS should ensure reclamation and mitigation of disturbed areas is completed in a timely fashion and ramifications of failure are clear. The FS should include standards for reclaimed areas such as: specifications on plant species, timeframes for meeting criteria and contingency plans for unexpected drought, moisture or other events such as fire.

The EIS should allow FS officials, grazing permittees and private landowners the opportunity to work cooperatively. The FS should build flexibility into the plan so managers can make the best case-by-case decisions.

We thank you for the opportunity to comment and look forward to reviewing the future EIS.

Sincerely,



Jason Fearneyhough
Director

JF/jb

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation

Wyoming Game and Fish Department
Wyoming State Grazing Board
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