



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.

December 9, 2009

Ms. Kimberlee Foster – NEPA Coordinator
Bureau of Land Management, Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

Dear Ms. Foster:

Following are the comments of the Wyoming Department of Agriculture (WDA) pertaining to the Bureau of Land Management's (BLM): Scoping Notice for an Environmental Assessment (EA) on the proposed Bridger Coal Lease Modification 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 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 continue to provide us the opportunity to express pertinent issues and concerns.

The proposed lease modification would undoubtedly impact private lands, federal grazing permittees and available forage for livestock and wildlife. WDA's top concern of the proposed project and eventual expansion of the coal mine is the long-term loss of vegetation and Animal Unit Months (AUMs). The WDA requests the BLM fully analyze loss of AUMs and develop mitigation strategies to offset these losses. The Bridger Coal Mine has been in operation since 1974 and should already have relationships with the private landowners and grazing permittees. We strongly encourage Bridger Coal Company and the BLM to work closely with permittees and private landowners to address their concerns.

The WDA supports compensatory mitigation discussions between Bridger Coal Company and livestock permittees to lessen the economic impacts that may occur from the implementation of the proposed project. Such mitigation strategies and costs could include, but are not limited to the following: movement of livestock to an open allotment or pasture, monitoring of impacts, construction of water and range improvements on either public or private land, purchase or lease of additional grazing land to replace those lost, and reimbursement to producers for loss of grazable vegetation.

The WDA would like to emphasize the critical importance of timely and effective reclamation, along with proper control of weeds and undesirable plants, to occur

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throughout the life of the coal mine. Successful reclamation and weed control is a major concern for all projects occurring in Wyoming, and should be thoroughly analyzed. We urge the BLM to identify successful reclamation criteria and the full expectations of Bridger Coal Company.

In addition, the WDA requests the BLM analyze these additional individual effects upon livestock grazing operations: 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 palatability of 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.

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 in the best interests of the affected resources and citizens should be addressed.

In conclusion, the WDA supports the BLM's principles of multiple use and sustained yield of our nation's resources and appreciates the opportunity to comment on the scope of the proposed project. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JE/cw

CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
State Grazing Board
Wyoming Association of Conservation Districts