

TOWN OF PINEDALE COMMENTS

FOR THE
BUREAU OF LAND MANAGEMENT'S
**REVISED DRAFT OF THE SUPPLEMENTAL
ENVIRONMENTAL IMPACT STATEMENT
(DSEIS) FOR THE PINEDALE ANTICLINE
OIL AND GAS EXPLORATION AND
DEVELOPMENT PROJECT**
2007

February 2008

The Town of Pinedale is submitting these updated comments pertaining to the Bureau of Land Management's Revised Draft of the Supplemental Environmental Impact Statement (DSEIS) for the Pinedale Anticline Oil and Gas Exploration and Development Project (2007).

Summary

Overall, when considering the incredible mineral wealth of the Anticline natural gas field (industry experts have said the Pinedale Anticline is among the richest natural gas fields in the world), and both the dramatic positive and negative impacts our community will incur because of the roughly seven fold increase of the number of wells present now if the Bureau of Land Management's (BLM) preferred alternative is approved, it seems imperative that the BLM would require in the final Environmental Impact Statement (EIS) for the Pinedale Anticline:

- 1) Clearly outlined Best Management Practices required of all industry operators;
- 2) Directional drilling as the normal mode for industry development;
- 3) Conditions and firm thresholds that need to be addressed as part of the Adaptive Environmental Management system, in order to respond to any unforeseen or unaddressed negative effects from the increased energy extraction and activities. Requirements need to be included in the Final Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project that will put enforcement power into the Adaptive Environmental Management System, something that is not present under the current system.
- 4) The best possible mitigation and monitoring of all activities and impacts. **Provisions in the Final EIS that make mitigation a reality and not simply something referred to in planning documents.**
- 5) A slower and more staged pace of energy development to allow Sublette County towns to respond to the impacts we are already incurring from the rapid gas field development, and to allow for our towns to stabilize these influences and to avoid a repeat of the "boom and bust" cycle that is of no ultimate long-term benefit to our communities.

Impacts

Town of Pinedale officials ask under regulation CEQ 1501.6, referring to Cooperating Agencies, a designation given to the Town of Pinedale, that the BLM respond to and include in the final EIS, the detailed socioeconomic analysis, entitled, "The Sublette County Socioeconomic Impact Report, Phase I Final Report," dated January 2008, that has been submitted to the BLM on behalf of Sublette County by the Sublette County Board of County Commissioners to the BLM.

Included in this detailed analysis are past, present and expected future socioeconomic impacts that will affect the county, with specific impact information about the Town of Pinedale, hereafter referred to as the "Town." We ask that this document and the socioeconomic affects noted in this report be specifically addressed in the BLM's final EIS for the Pinedale Anticline, per CEQ Seq. 1503.4, which legally requires

the BLM to specifically respond to Cooperating Agencies expressed concerns. We will expect to have the BLM's responses to Pinedale's documented socioeconomic issues in the final EIS.

The Sublette County Commissioners (noted hereafter as “Commissioners”) have submitted the “Sublette County Socioeconomic Impact Report, Phase I,” for consideration under the Pinedale Field Office’s Resource Management Plan (RMP). The Town asks that the concerns and information contained in this report be considered on behalf of the Town for the Revised Draft of the Supplemental Environmental Impact Statement (DSEIS). The Town asks that the BLM in their final EIS for the Pinedale Anticline, expected later this year, would specifically address mitigation actions for the cumulative affects of continued energy development on the Anticline and throughout the Pinedale Field Office’s management area. The Town of Pinedale is directly impacted from these BLM-approved activities.

Since the RMP is the overarching document for uses on BLM lands in our area, including the Anticline, we request that the BLM include the “Sublette County Socioeconomic Impact Report, Phase I,” findings specific to the Town of Pinedale into the final SEIS. Town of Pinedale officials ask that the BLM include in the final SEIS, specific and quantifiable actions to mitigate the documented socioeconomic impacts to our town.

The Town of Pinedale is depending on the Sublette County Socioeconomic Impact Report, Phase I for our socioeconomic analysis, since all of Sublette County’s communities are interdependent on one another and are all incurring impacts from intensive natural gas drilling on primarily BLM lands surrounding our towns. We expect that the Town of Pinedale will incur the greatest impact with the increased drilling on the Anticline since we are the largest town in the county and the closest to the Anticline, with town borders only one mile from the Anticline drilling areas.

Faster-paced drilling means less time for Pinedale to react to the impacts we are continuing to face. Our position remains that a steady, slower energy development pace would benefit our town and county, allowing more time for our town to properly respond to the increases in population and all the attendant socioeconomic impacts. We are concerned that year-round drilling on a large scale will hasten the pace of drilling, thereby putting more pressure on Pinedale to more quickly address the increased impacts to our infrastructure (water, sewer, roads, and other town services). Impacts to the Town have been identified and communicated to the BLM over the past several years.

It appears that a slower pace of drilling, however that takes place, would create a more even and temperate pace of development, avoiding the unsustainable “boom-bust” patterns that Town of Pinedale officials have repeatedly been told, by BLM, state and industry representatives, are patterns those agencies also want to avoid.

However, we are concerned that the BLM plans as noted in the Revised DSEIS do not appear to take decisive actions or put forth a course of action which would encourage a more even pace of energy development, with a longer drilling period. Lengthening the drilling period would allow a slower accumulation of economic benefits to our community and state at large, thus helping to avoid the boom-bust cycle.

Protect economic diversity and stability

Because of the substantial socioeconomic impacts that the proposed planned increase in gas development will bring to the Town of Pinedale, we ask BLM planners for careful consideration of the speed of development and the protection of local economic stability. We urge the BLM to slow down, or at least more evenly pace energy development to allow the affected towns, such as Pinedale, to adequately plan for infrastructure capacities, increased traffic, to allow market forces to increase the amount of housing available, allow our school systems to plan for a greater population and the myriad of other effects to our community due to a rapid population influx.

If the BLM approves a planning document which, in reality, allows for the fastest possible energy development on lands surrounding Pinedale, the Town of Pinedale asks BLM managers to create provisions in the final EIS which would provide on-the-ground resources for the Town of Pinedale to address the social and economic impacts that we will continue to bear with rapid energy development.

By slowing down development, our community would be better able to handle the socioeconomic impacts that we have been struggling with for the past several years. One way to stage development is not to allow development in new areas until already developed areas are fully reclaimed. We are concerned that year-round drilling might undo the more stable affect of phasing-in development. Town officials are wary that current plans as noted in the revised DSEIS would not result in a more stable pace of energy development for the Anticline.

We maintain our past position that since the BLM is the agency overseeing and guiding the vast majority of the industrial development in our area, it is the responsibility of the BLM to mitigate some of these social and economic affects, since controlling the pace of industry's development is out of the control of the Town of Pinedale and other Sublette County officials.

To allow the pace of natural gas development to proceed without meaningful consideration of the impacts to surrounding towns that provide infrastructure and service support for these energy activities, is a neglect of responsibility by the BLM, as noted in the National Environmental Policy Act (NEPA). As noted in the NEPA, "When...economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment...." (40 CFR1508.14).

Further, as noted in the 1989 U.S. Supreme Court case, Robertson v. Methow Valley Citizens Council, 490 U.S. 332, It is both an EIS and NEPA requirement that, "other action-forcing" procedures implement that statute's sweeping policy goals by ensuring that agencies will take a "hard look" at environmental consequences and by guaranteeing broad public dissemination of relevant information..."

We maintain that one way to mitigate the undesirable effects of the "boom-bust" cycles that have historically come with rapid minerals industry development is to protect our community's economic diversity, so that we do not become single-industry towns, to the detriment of all our other businesses.

In fact, while the Town of Pinedale has incurred substantial financial impacts from the latest energy boom, we have not always gained proportional financial benefits for those impacts.

The Town of Pinedale strongly supports effective, meaningful and ongoing monitoring of *all* impacts from the increased Anticline development. Meaningful, ongoing monitoring is necessary to make the SEIS a useful document. **The Town of Pinedale supports Adaptive Environmental Management as one method for doing this, and asks the BLM to respect, consider, and implement the recommendations of the Pinedale Area Working Group, the entity charged with this task.**

According to the NEPA, it is imperative that the BLM consider the impacts of their policies and permitting of energy development. Specific policies that help preserve economic diversity in a small town such as Pinedale include:

- A substantial offering of varied housing prices (from lower income to upper income).
- Preserving other public uses of our BLM lands, honoring BLM's multiple-use mandate. Uses that contribute to other industries (such as grazing/ranching and tourist-based businesses, such as fishing and hunting).
- A pace of energy development that the local economy, such as Pinedale's can absorb. Not allowing a pace of energy extraction that overwhelms the local economies, which is currently happening.

Overall, because of the socioeconomic changes that the DSEIS alternatives would bring, we remain concerned over the following points:

Impact Assessment

As noted earlier in these comments, the BLM needs to specifically address the socioeconomic impacts from the Anticline and other cumulative affects as noted in the Sublette County Socioeconomic Impact Report, Phase I.

- Since the BLM is approving the growth, we believe it is the BLMs responsibility (as noted in the NEPA) to analyze the growth the BLM is allowing. A "Revenue minus Costs" analysis in the Final Pinedale Anticline SEIS would be helpful for our municipal planning.
- Negative social-economic impacts of dramatically increased employment opportunities stemming from the large increase in gas production should also be analyzed. Pinedale has been dealing with such impacts for several years now. It seems improper for the agency proposing the substantial growth not to detail *all* of the results of that growth, as well at mitigation for the rapid growth.
- Because current population growth is happening faster than our community can respond, in the past several years, despite a 17 percent population growth rate, many of our service businesses

have struggled to keep their doors open for lack of qualified workers. Quite the opposite of a thriving *diverse* economy.

- Because the DSEIS proposes much longer gas field development than earlier planning documents stated, in order to protect our economic diversity and make policy decisions which support that, the SEIS needs to provide greater detail about the long-term and cumulative affects of this expanded field development.
- It is important for our municipal planning that we have accurate population growth estimates. The BLM should supply this information in its Final SEIS.

Impact Mitigation to the Town of Pinedale

If year-round drilling is approved by the BLM, and because such year-round drilling will have direct affects on our area, Town of Pinedale officials ask that:

At the end of the two-year time period from when year-round drilling is permitted by the BLM, that it be required in the Final SEIS that the BLM will conduct an in-depth analysis that will verify that specific objectives noted in the SEIS have been met. If these objectives are found from this analysis not to have been met, we ask that the BLM place provisions in the Final SEIS that will mandate that these objectives be addressed. Issues Town of Pinedale officials would like to be examined in this process include:

Overall—have the negative socioeconomic impacts to towns, such as Pinedale, been mitigated, or improved? Specifically:

- 1.) Has the locally-available workforce stabilized?
- 2) Have impacts to Pinedale's roads received funding from industry's impact? Or, have the industries that have caused the direct impact to Pinedale's town roads been successful in mitigating those increased industrial traffic impacts, either through dramatically reducing the traffic, or by helping pay for the impacts their industry is causing to town roads?
- 3.) Has economic diversity in Pinedale and the immediate area been preserved? Has it decreased? Has it increased? Are there a higher number of non-energy development businesses thriving, or not?
- 4.) Have the strict air quality standards set in the Final SEIS been met, or is there evidence that they will be met? Have those standards been violated?
- 5.) Has wildlife been adequately protected? Or have the numbers decreased and does the management of energy activities on the Anticline need to be changed in light of the situation?

6.) Has Pinedale's school system been able to plan for and fund the rapid influx of new students?

7.) Have basic housing issues been solved? Is there adequate housing for all sectors of Pinedale's population? Can younger people find places to live?

8.) Is the basic infrastructure (as noted in the Sublette County Socioeconomic Impact Report, Phase I) that Pinedale relies on adequate? Or, are the growth pressures largely connected with such rapid energy field development outpacing the ability for this small town to pay for adequate infrastructure services such as water and sewer systems?

9.) Are basic services able to be maintained? Law enforcement? Medical and emergency services?

10.) Are area water resources, both surface and underground, being properly protected? (Water sources such as Fremont Lake, Pinedale's water source the area's underground water aquifer, and area streams and rivers?)

The current Adaptive Management system has been in place, rather unsuccessfully, under current BLM Anticline Record of Decision. Specific limits on impacts from the increase in energy development need to be included in the final SEIS for the Anticline, with specific actions required when those limits are reached.

Mitigation Funds

We applaud the mitigation fund proposed by the operators for off-setting on-site impacts of their increased development. **However, it appears that there is no direct mitigation commitment for the substantial socioeconomic impacts that our town will sustain from the proposed dramatic increase of the current amount of energy development today.**

To realistically address the town's social and economic impacts from such dramatic industrial impacts, a separate mitigation fund for Pinedale should be established that will be used to pay for addressing the impacts from the Anticline development. While the town acknowledges that there are increased funds from some tax revenues, those increased revenues are not enough to meet pressing infrastructure needs in a timely way.

We also ask for specific considerations of the following in the final SEIS:

1. Traffic

Traffic impacts are one of the Town of Pinedale's top public safety concerns. Early conservative estimates have documented that between 2001 and 2005, the number of large, industrial trucks increased by 50 percent on U.S. Highway 191 at Pinedale's southern border. The Town also defers to the information on traffic impacts as noted in "Sublette County Socioeconomic Impact Report, Phase I."

The Town of Pinedale needs to maintain our main road –Pine Street, also known as U.S. Highway 191– as a safe and pedestrian-friendly byway. Rapid gas field development, as we have experienced in Pinedale, brings with it greatly increased industrial and other truck traffic driving through Pinedale.

Pinedale town planners need more time to address these traffic increases to adequately protect our pedestrians, which include many children who live just off of Pine Street and cross Pine Street enroute to school. Town of Pinedale officials continue to work to improve public safety in our town, considering the great increase in traffic.

Unfortunately, through default, much of the industrial traffic connected with the Pinedale Anticline gas field travels down one of Pinedale's main residential streets, Tyler Avenue. Because of this, that street has sustained wear and usage that it was never designed for.

For instance, the twin bridges on Tyler Ave. were not constructed for the amount, or the weight, of traffic that those two bridges are subjected to now. This unexpected truck traffic needs to be addressed by BLM planners finalizing the SEIS.

Tyler Ave. is the route to our county courthouse, the county library, a popular youth skate park, our most popular town park, and is lined with residences. It is one of the worst places that large, heavy, industrial traffic could travel through. Yet, because of Anticline development, there is *heavy and inappropriate industrial truck traffic* using that road as an entry to the gas field development on the Anticline.

The Town of Pinedale asks BLM officials to identify and help construct an alternate route for gas field traffic to access the Anticline, to remove this sort of industrial traffic from Tyler Ave. and elsewhere in town.

The Town of Pinedale requests that BLM policy managers consider very carefully all traffic impacts to the Town of Pinedale with the huge increase in well development that is being proposed on the Anticline. As the Town is working to address these traffic impacts, it is requiring *years* to adequately address these changes, since our main street is also a state highway. Slowed down gas field development will give Town officials more time to implement greater safety standards for our town's main roads. Without slowing down the pace of development, the Town of Pinedale is left to deal with the boom town impacts before we can implement the proper changes which will result in poorly planned and marginally effective solutions.

2. Transportation

We ask as part of the consideration of future impacts to our area's transportation abilities and needs, as the Pinedale Anticline field is developed, that the BLM would encourage the serious analysis of rail line development, to provide for overall transportation development in our area, as well as offset the negative affects of the traffic from the Anticline field. Rail lines in the region could be used to transport other goods to our Town and region, in addition to responding to the increasing transportation needs of the field. Additionally, with this additional mode of transportation, rail-road service could provide an economical way of transportation to our area and provide for reduced costs of basic goods for our communities.

3. Housing.

Slowing down the current pace of energy development would allow more housing to become available for our workforce. The pace of natural gas development in our area continues at a faster pace than our local economy can properly respond to, even though there is not enough pipeline capacity in the Anticline field

to transport the natural gas onward to market. Because of the lack of available housing, energy workers are living in temporary housing, such as hotel rooms, disallowing the ability for other travelers to stay in Pinedale as needed.

Our housing market needs more time to “catch up” to provide more housing, particularly at the lower income level. More housing would help stabilize our overall workforce.

In a report by the Sublette County Socioeconomic Analysis Advisory Committee, it is estimated that there is a workforce of 3,000 people currently employed by the natural gas industry in Sublette County. With an entire county population equaling roughly 7,000 the huge population impact from this industry alone must be addressed.

And according to the committee’s *Housing and Real Estate Trends...* report, Sublette County is expected to grow nearly 40% (in population) between 2000 and 2010. To quote that report, “The growth is in large part driven by natural gas extraction and development taking place in the area.” That reports notes that, partly because of this growth pressure, families in the lower 40% of county income levels have “very few affordable housing options. Housing rentals are of short supply in any price range...”

According to the Committee, the cost of living in Sublette County is roughly 21% higher than the Wyoming average. The lack of attainable housing, coupled with a high cost of living, puts undue pressure on the Town of Pinedale and the other county towns.

The Town also defers to the specific socioeconomic data provided in the “Sublette County Socioeconomic Impact Report, Phase I,” in these matters.

We need to protect our economic diversity. One way to do that is by having various prices of housing available, to provide housing for all sectors of our community.

4. Infrastructure

Financially, while the Town of Pinedale sustains most of the social and economic impacts from the rapid development of the Pinedale Anticline, proportionally, we received proportionally minimal mineral taxes from that gas field. Because of the rapidity of the social and economic changes with this latest gas “boom,” local municipalities, such as Pinedale, have had to rely on the generosity of Sublette County and the state to provide funding for such necessities as replacing insufficient and aging sewer lines, planning our water supply and other basic infrastructure services, on which both the energy industry and our growing population rely.

Because of the significant impacts to our community, we support the BLM and other state and local leaders working to create a separate mitigation fund for the Town of Pinedale that could help in addressing our infrastructure impacts.

Pinedale and Sublette County’s other directly-impacted towns need guaranteed financial assistance with direct-impacts such as:

- Road maintenance

- Increased traffic impacts (to improve the safety of our downtown roads)
- Upgrades and expansions to aging infrastructure such as water and sewer lines
- Cost sharing for future expansions to our infrastructure to respond to the increased population
- Cost impacts to our school system
- Cost and manpower impacts to our law enforcement, emergency and medical services

Additionally, while Pinedale has been able to upgrade our municipal sewer treatment plant, the unplanned population increases are placing pressure on that system.

The Environmental Protection Agency will also require the Town of Pinedale to implement an advance water filtration system by 2014 at an estimated cost of more than \$2.2 million. In addition, the Town of Pinedale needs to implement millions of dollars of infrastructure upgrades.

5. Town Views and Character

The Town of Pinedale urges the protection of the views from Pinedale looking out on to the “Mesa,” also known as the “Anticline,” or “Pinedale Anticline Project Area. (PAPA).” The Town opposes the “industrialization” of our view of surrounding public lands. As a small, rural, western town, an integral part of our economy has been ranching, tourism and other industries also based on our public lands. Industrializing our views from Pinedale could directly harm our historic tourism business.

The Town of Pinedale supports a diverse economy, and protecting other industries in our community is supporting economic diversity. This “view shed” of the Anticline, as the BLM names our view areas, is only one mile from the center of Pinedale. The Town of Pinedale asks that the BLM protect the view areas of Pinedale and immediate environs.

Specifically, we ask that the BLM keep development off the eastern flank/edge of the Anticline Crest, either by not leasing the area, or only allowing development with a “no surface occupancy” stipulation. Otherwise the intensive development of the land there (under the proposed plan there would be double the number of rigs on the Anticline during the average year-round count), with the rigs, the new roads, and eventual permanent production facilities will change the character of Pinedale and surrounding communities.

This includes the foreground and middle ground views of the land surrounding town and the distant views of the mountains. The lands surrounding our town are a vital part of our community’s life and contribute to making Pinedale the small, clean, safe, visually beautiful and friendly western town that we are.

6. Crime and Law Enforcement

The Town again defers to the specific data supplied in “Sublette County Socioeconomic Impact Report, Phase I.”

Additional data has been supplied by the Sublette County Socioeconomic Analysis Advisory Committee, which has noted that “the number of index crimes reported and arrests made in Sublette County have continued to increase at a nearly exponential rate since 2000. The rise in reported index crimes has been found to be highly correlated with the amount of rig activity in Sublette County.”

The increased energy development activity has put more pressure on our county’s sheriff’s department, which also provides law enforcement services to the Town of Pinedale, which currently does not have its own police department.

The Sublette County Sheriff’s Department has informed us that retaining personnel has been difficult, because employees have often chosen to leave the sheriff’s department and work for the energy industry, which pays more money than county jobs.

It is imperative that our local sheriff’s department personnel be adequate and stable, and that the pace of development take into account that the rise in crime is closely connected to the increase in rig activity.

Sublette County also has very limited treatment options for substance abuse, which has reportedly risen dramatically, contributing to the increase in substance abuse problems and the related crime and social difficulties.

These impacts need to be addressed in the final SEIS.

7. School Systems

The Town again defers to the specific data supplied in “Sublette County Socioeconomic Impact Report, Phase I.”

At the beginning of the school year for 2006, our local school district had an estimated 20 percent increase in students from the prior year. This substantial increase in first-day students put pressure on our school system to house and properly teach our students as additional teachers needed to be found quickly. By slowing the pace of development, school officials will be given additional time to properly plan for the increase in students. Additional growth impact monies were also removed from our school districts by the legislature, taking away additional financial flexibility from our school officials. These impacts need to be addressed in the final SEIS.

8. Medical Services.

The Town again defers to the specific data supplied in “Sublette County Socioeconomic Impact Report, Phase I.” Because Sublette County is a remote community, it is very important that we have strong medical facilities and emergency response services. The rapid population influx from the growing energy industry into our community has put a strain on our modest medical clinic, and our community is currently trying to stabilize our medical services.

Sublette County has no hospital. The closest hospital is 1.5 hours away by ambulance. Our medical, emergency and fire services should be financially supported by the industry that is bringing these direct and dramatic population impacts to our small community. Currently, these services are struggling to keep service at effective levels. These services need additional equipment and funding to do so.

9. Wildlife

Wildlife are important “residents” of Pinedale. We ask for the maximum amount of caution concerning wildlife protections in the Anticline area. Our big-game species such as deer, elk and pronghorn are all part of the enjoyment of our community and are an important component of our tourism industry. Careless decisions concerning wildlife management in the face of intensive industrial development in areas historically used by these animals could easily result in devastating losses in the number of these animals.

Northwest Wyoming and our community in particular, are known for our large wildlife population. We are very concerned with the dismissal of seasonal stipulations, particularly winter stipulations.

We are concerned that information from respected biologists notes that habitat disturbance will cause further declines to area wildlife. While we applaud efforts to reduce habitat destruction, we ask that detailed actions be required in the final SEIS that will:

- 1.) Specify how and when mitigation will be conducted
- 2.) Require permanent restrictions in the final SEIS to reduce habitat destruction and disturbance (perhaps combining solutions outlined in Alternatives D and E in the draft SEIS
- 3.) Remove plan aspects that would allow the slow spread of habitat destruction while not requiring proven mitigation actions

Wildlife, whether antelope, deer, moose and the many other species that grace our town, are an important part of what Pinedale is, and hopefully, will remain for generations to come. If those animals disappear from our community, Pinedale will have lost an integral part of our character.

Considering the 46 percent decline in the mule deer population since drilling began in the northern portion of the Pinedale Anticline, a decrease that occurred when roughly 1,000 acres of mule deer winter range were disturbed, and that an additional disturbance of thousands of acres of crucial winter range will occur under the preferred alternative, we urge the BLM and cooperating wildlife management agencies, to use the *maximum amount of caution* when making decisions that could affect these herds for decades.

As noted in our earlier comments, we support the recommendations of the Wyoming Game and Fish Department, and in particular the departments, *Recommendations for Development of Oil and Gas Resources with Crucial and Important Wildlife Habitats.*” Specific recommendations from that report include:

- Maintain seasonal restrictions
- Adopt practices that lessen habitat disturbance – directional drilling, clustered development, piping liquid wastes and remote monitoring
- Require habitat-enhancing projects that mitigate direct and indirect habitat impacts
- Not allow development in identified wildlife migration corridors, in crucial winter range or near sage grouse leks

Considering the proposed tremendous increase in drilling, we request that the BLM do the following while finalizing this DSEIS:

- **Operators and the BLM need to insure adequate mitigation and appropriate monitoring to assure their desired results. It is only with meaningful monitoring and mitigation that the plans of the final SEIS will be effective.**
- Because of the increased encroachment onto key animal habitat and the effects from those actions, we ask that the final Supplemental Environmental Impact Statement (SEIS) include a way to effectively monitor and restrict impacts of this increased gas field development to insure there are no additional declines in wildlife populations.
- The final SEIS should include a mechanism for maintaining big game distributions on or adjacent to, the current project area crucial big game winter habitats.
- The final SEIS should include protections to maintain big game migration routes so that traditional year-round seasonal ranges continue to be used.
- It is important that the final SEIS provide adequate amounts of suitable undisturbed crucial winter range to maintain big game distribution at any point in time during development.
- The final SEIS needs to address drilling stipulations outside of the Anticline crest. No exceptions to seasonal wildlife stipulations should be permitted outside of Concentrated Development Areas.
- The SEIS doesn't provide limitations on the delineation wells that will be drilled. Delineation should be limited by number and to areas near “Concentrated Development Areas,” and restricted by all seasonal wildlife stipulations.

- The final SEIS needs to provide specific requirements to protect water quantity, water quality, aquatic habitat components (including riparian areas), habitat connectivity and distribution of sensitive fish.
- Insure occupied habitat for shrub-dependent species is well distributed throughout the project area.
- Because industry is bringing these impacts to our environment, it makes sense to have a continued commitment from industry operators to continue funding mule deer, pronghorn, and sage grouse studies for the life of the field.
- Reclamation must be substantial, effective and timely. The BLM should require sufficient bonding from operators as insurance that this will be done, regardless of changes in operators.
- The BLM must address the cumulative impacts leading to the decreased regional habitat function.

10. Water

The final SEIS must provide for adequate ground and surface water protection and monitoring. Our community is home to several nationally-beloved waterways, the Green River and the New Fork River. The Green River, a headwater of the Colorado River, is an important and irreplaceable resource for our community. Pine Creek, which runs through Pinedale, is enormously important to our town as a water source and greenbelt. All of these waterways must be protected properly during the proposed seven-fold increase of energy development on the lands surrounding these rivers.

We remain concerned about the adequacy of BLM monitoring and actions taken to protect our region's groundwater. With the major drain energy development may have on groundwater, (since current energy development pulls thousands of gallons of water from our regional aquifer each week) coupled with a severe ongoing drought in our region, is BLM planning addressing these two severe impacts on the area's aquifer?

Town of Pinedale officials are also concerned about the affects of air pollution on our municipal water supply, namely, Fremont Lake. The U.S. Forest Service monitors this phenomenon in the high mountain lakes in the Wind River Mountains, but we ask that the USFS also monitor the lower part of Fremont Lake to analyze how air pollution may be affecting our town's water supply.

We strongly support a ground and surface water monitoring plan in the final SEIS.

Accountability and mitigation need to be required of the activity causing the changes, or pollution of the water, which in the past has been caused by the energy development in our area.

Because the Anticline is only one mile from Pinedale, while our drinking water comes from Fremont Lake, we still believe that a full and very conservative course of protection action must be included in

the BLM's final SEIS. Since the BLM is permitting this full scale industrial development, it is the obligation of the BLM to provide full monitoring of water quality for the protection of public health and safety and for protecting the quality of our area waterways, many of which are a crucial part of our lives here for recreation and for our tourism industry.

Water monitoring should not be foisted onto other local area agencies which don't have the resources and shouldn't be held responsible for monitoring such large industrial activity which the BLM is charged with supervising.

Because benzene and other contaminants were detected in late 2006 from wells in proximity to natural gas development in our area, we are very concerned that adequate protection, monitoring and accountability measures are being required by the BLM to protect all the water that the Town of Pinedale depends on. Stringent water protections must be included in the final SEIS.

11. Air Quality

As one of the population centers for Sublette County, it is important that the BLM implement policies which protect our clean air that we have historically enjoyed here in Pinedale. This is an important public health concern that we urge the BLM to pay the utmost attention to. If air quality continues to degrade, the Town has been informed by air quality experts that federal regulations could then be implemented and inhibit the Town's ability to further build and develop.

We support the request from the Governor's office that the SEIS require zero days of visibility impairment and an 80 percent NO_x reduction in five years. The Town of Pinedale also supports the DSEIS recommendations from the Air Quality Task Group of the Pinedale Area Working Group.

- The Town of Pinedale supports the most stringent monitoring and control of our area's air quality, which historically, has been pristine.
- We are concerned, as noted by the Air Quality Task Group that in the DSEIS there is no mechanism to track completions of proposed control measures. It is imperative for protecting the health of our local population that air quality be continuously monitored. Otherwise, we could assume that "control" efforts might not be effective and therefore would be rendered meaningless.

We ask that the final SEIS include:

- Specific time periods for air quality mitigation measures to be fulfilled
- Identification of the responsible parties to complete these mitigation measures and identify personnel who will keep track of the required monitoring and mitigation
- Specifics outlining how that information will be reported back to involved agencies and the general public.
- Additionally, we support the PAWG Task Group recommendation that, again, specific parties be identified for completing modeling visibility impacts. And that monitoring information be as timely and relevant as possible. We support the recommendation of at least one model being run annually.
- Since so much of the increased Anticline development is being requested in exchange for the benefit of reduced air emissions and fewer negative impacts on wildlife and habitat, it is important for the BLM to identify in the SEIS, how specifically this will be done and reported back to the public that these measures were actually fulfilled.

- In the past, we have seen how BLM field developments were *not* monitored, when RODs for those areas specifically required so. Who will be keeping track to insure that all specified actions are being done? We support the recommendation of the Task Group to follow the example of the Jonah Infill ROD, Appendix A, Air Quality Item 2.
- We also support the PAWG recommendations pertaining to the Southwest Wyoming Monitoring Network Assessment, in addition to all Wyoming Department of Environmental Quality standards.

Other comments

1.) Confine development to the Concentrated Development Areas

New drilling, pad construction and road building should be limited to the industry-identified “concentrated development area” along the crest of the Pinedale Anticline for the life of the field.

2.) Define limits/thresholds for Adaptive Management Changes.

We would like to see a limit placed on the allowance for negative results from the greatly expanded (over two decades) drilling period. When thresholds for negative impacts to air and water quality and wildlife, and socioeconomic impacts are reached, the immediate reduction in the pace of development on the Anticline would be required.

The Town of Pinedale urges the BLM to make every effort to mitigate the negative boom-bust impacts on our community. We also urge the BLM to consider the cumulative effects of rapid development on our *entire* region, of which the Pinedale Anticline is just one part.

-end-