

## **Public Comments and BLM Responses on the Draft SEIS Local Agencies**

**Comment Number**            **LA-1-1-T-1**

**Comment**

We endorse the request that BLM participate and help provide leadership to address developing an alternate route for gas field traffic to access the Anticline.

**Response**

The BLM has issued a right-of-way to the County for those portions on BLM land.

**Comment Number**            **LA-1-1-T-2**

**Comment**

Sublette County realizes that industrial traffic throughout the energy field is a major issue and is ready and willing to work in a cooperative effort with Pinedale, energy operators, landowners, and BLM to develop an alternative route for industrial traffic from the Jonah Field through the Anticline as a means of addressing this issue.

**Response**

Thank you for your comment and support.

**Comment Number**            **LA-1-2-SE-1**

**Comment**

We encourage the BLM to analyze in detail the need for housing, including types of housing that will be needed under the proposed alternatives, as well as mitigation measures that will address the housing issues.

**Response**

Providing the detailed housing information requested in this comment requires that a county-wide Housing Assessment be conducted. Conducting a Housing Assessment is beyond the scope of the EIS process, the Revised Draft SEIS suggests that the operators contribute to the funding of a Sublette County Housing Assessment.

**Comment Number**            **LA-1-3-SE-2****Comment**

We request the BLM accept the responsibility as part of developing the recommended alternative to ensure a process is established which will foster effective economic impact mitigation measures, as well as effective communications.

**Response**

Thank you for your comment. BLM looks forward to additional communications.

**Comment Number**            **LA-2-1-SE-1****Comment**

As a Law Enforcement Administrator it would be extremely helpful to see the year round drilling program move forward for the following reasons: 1. As it is now, there is a big rush in the spring to start drilling on the Mesa. With the rush, Sheriff's Office calls increase dramatically especially in the areas of traffic enforcement. 2. Accidents increase along with congestion issues in all three towns (Pinedale, Big Piney and Marbleton) along with the County and BLM roads. 3. Year round drilling would enable my office to monitor a more steady and balanced traffic flow, and afford the Sheriff's Office to better track and plan for future needs; not only for the Sheriff's office but all citizens in general.

**Response**

Thank you for your comment. BLM will consider this in issuing a decision.

**Comment Number**            **LA-3-1-SE-1****Comment**

Apparently speaking of the Sublette Rural Health Care District, page 3-22 of the document states that, "There has not been an increase in trauma incidents in the period 2000-2005 and they are equipped to meet the current demand." This statement is incorrect. Please revise this to reflect the attached statistics.

**Response**

This section has been revised in the Revised Draft SEIS to reflect statistics provided by Sublette County EMS.

**Comment Number**            **LA-3-2-SE-2****Comment**

Page 4-17 of the DSEIS (where impacts of the various alternatives should be described) says only that, "Both the Pinedale Volunteer Fire Department and the Sublette Rural Health Care District have added equipment and personnel during the period 1999 to 2006 and are adequately meeting demands (Mitchell, 2006 and McGinnis, 2006)." It does not describe any impacts. We would be interested to know what impacts you project as related to medical service demands on us.

**Response**

Additional information has been provided in the Revised Draft SEIS. It provides a range of estimated population increases under each alternative by year. Because of data limitations it discusses, but does not quantify, the anticipated impacts to medical service demands.

**Comment Number**            **LA-3-3-SE-3****Comment**

It is difficult to believe that all alternatives will have the same outcome, but in any case population predictions by County or Town (not the combined population of 3 counties) would be the only meaningful planning tool for us.

**Response**

The Revised Draft SEIS provides estimates of population increases under each alternative by year.

**Comment Number**            **LA-4-1-G-1****Comment**

The Sweetwater Economic Development Association supports the proposed action alternative submitted by operators which would allow for year round development in specific development areas with the accompanying mitigation to offset impacts.

**Response**

Thank you for your comment.

**Comment Number**            **LA-4-2-SE-1****Comment**

Table 3.5-7 shows population forecasts for Sweetwater County and its incorporated communities. The 2006 forecast for Rock Springs shows a population of 19,004. We believe

this number to be significantly lower than the actual population for the following reasons: Increased residential electrical hook ups; Increased school enrollment; Increased housing development with decreasing vacancy rate.

### **Response**

In the Revised Draft SEIS, numbers in Table 3.5-7 have been updated; however, the area is undergoing rapid growth being driven by a major oil and gas boom which affects the reliability of the data.

**Comment Number**                      **LA-4-3-SE-2**

### **Comment**

The increase in population is further supported by the increase in enrollment in School District #1 (Rock Springs). They are up to 159 students over last year at this time. Finally, new home construction in Green River/Rock Springs is up from 101 total new house starts in 2004; to 230 in 2005; and 204 in 2006. While inventory has increased the vacancy rate has dropped drastically to 1% for homes and 1.8% for apartments.

### **Response**

In the Revised Draft SEIS, numbers in Table 3.5-7 have been updated; however, the area is undergoing rapid growth being driven by a major oil and gas boom which affects the reliability of the data.

**Comment Number**                      **LA-5-1-W-1**

### **Comment**

Require strict adherence to Wyoming Game and Fish Department Minimum Recommendation for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats.

### **Response**

Criteria advanced by WGFD (Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats -December 6, 2004) would categorize most of the current Pinedale Anticline Crest as an area of "Extreme Impact" - >16 well locations per square mile and >80 acres of well-field disturbance per square mile - whether in areas of crucial winter range (for pronghorn and mule deer) or areas of sage grouse leks, nesting and early brood-rearing habitats. As an area of "Extreme Impact", WGFD recognizes that "habitat function is substantially impaired and cannot generally be recovered through management or habitat treatments." Off-site mitigation is necessary to maintain properly functioning biotic communities and sustainable land uses by creating or enhancing replacement habitats Off-site mitigation should be located within the same landscape unit." There are no recommendations that allow for adherence except recommendations for mitigation. As noted in other responses to commenters, BLM can not legally require provisions for offsite mitigation.

**Comment Number**            **LA-5-2-PA-1****Comment**

Require that new drilling, pad construction, and road building be limited to concentrated development areas along the crest of the Pinedale Anticline, and that no drilling and development outside this area be permitted until the area has been fully developed and reclaimed. Development should not be permitted in new areas until existing disturbed areas have been reclaimed as useful wildlife habitat.

**Response**

See Revised Draft SEIS, Alternatives D and E.

**Comment Number**            **LA-5-3-W-2****Comment**

Require that drilling and development be staged over time to mitigate the impacts on wildlife and wildlife habitat.

**Response**

Alternatives B, C, D, and E specify development in stages, over time.

**Comment Number**            **LA-5-4-W-3****Comment**

Require that mapping of crucial wildlife habitat and protection of that habitat as drilling and development is permitted.

**Response**

Crucial wildlife habitat has been mapped. Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years.

**Comment Number**            **LA-5-5-G-1****Comment**

Require that all new development utilize the best available technology.

**Response**

Thank you for your comment. The Best Available Control Technology is under the purview of the WDEQ-AQD.

**Comment Number**            **LA-5-6-G-2**

**Comment**

We strongly support careful and measured development of the gas resources in a manner and at a pace that provides protection of critical wildlife habitat.

**Response**

Thank you for your comment.

**Comment Number**            **LA-6-1-G-1**

**Comment**

We urge the BLM to slow down, or at least move evenly pace energy development to allow the affected towns, such as Pinedale, to adequately plan for the 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 from a rapid growth influx.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-2-G-2**

**Comment**

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.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-2-G-3****Comment**

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, and the entity charged with this task.

**Response**

See Revised Draft SEIS. It is expected that the Pinedale Anticline Working Group would continue under all alternatives.

**Comment Number**            **LA-6-3-SE-1****Comment**

We need to see a more specific impact assessment of the growth effects from quadrupling the Anticline field. The Town of Pinedale would benefit from having a detailed analysis of the cost impacts to our town. Since the BLM is approving the growth, we believe it is the BLM's responsibility (as noted in the NEPA) to analyze the growth the BLM is allowing. A "Revenue minus Costs" analysis would be helpful for our municipal planning.

**Response**

The Revised Draft SEIS provides estimates of population increases under each alternative by year. It is beyond the scope of this SEIS to produce a budgetary planning analyses specific to the affected counties and communities.

**Comment Number**            **LA-6-4-SE-2****Comment**

Negative social-economic impacts of dramatically increased employment opportunities stemming from the large increase in gas production should also be analyzed. These impacts have not been addressed in the DSEIS.

**Response**

The Revised Draft SEIS provides a discussion of the boom/bust scenario in a rural setting where growth is driven by oil and gas development.

**Comment Number**            **LA-6-5-SE-3****Comment**

Because of 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 affects of this longer field development.

**Response**

The Revised Draft SEIS provides a discussion of the boom/bust scenario in a rural setting where growth is driven by oil and gas development.

**Comment Number**            **LA-6-6-SE-4**

**Comment**

It is important for our municipal planning that we have accurate population growth estimates. There is contradictory population estimate information in the DSEIS.

**Response**

The Revised Draft SEIS provides estimates of population increases under each alternative by year.

**Comment Number**            **LA-6-7-T-1**

**Comment**

Unfortunately, through default, much of the industrial traffic connected with the Pinedale Anticline gas field travels down one of Pinedale's main residential roads, Tyler Street. Because of this, that street has incurred wear that it was never designed for. For instance, the twin bridges on Tyler were not constructed for the amount, or weight, or traffic that those two bridges are subjected to now. This unexpected truck traffic needs to be addressed by the BLM planners finalizing the SEIS.

**Response**

This impact is discussed in the Revised Draft SEIS and mitigation measures have been identified.

**Comment Number**            **LA-6-8-T-2**

**Comment**

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 St. and elsewhere in town.

**Response**

BLM has issued a right of way to the county for access across BLM lands at the northern portion of the PAPA.

**Comment Number**            **LA-6-9-T-3****Comment**

The Town of Pinedale requests that BLM policy managers consider very carefully all traffic impacts to the Town of Pinedale with the quadrupling of well development allowed on the Anticline. As we are 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.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-10-SE-5****Comment**

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.

**Response**

Thank you for your comment.

**Comment Number**            **LA-6-11-SE-6****Comment**

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. Even without the population increases that will occur with the advanced gas field exploration and development, the Town of Pinedale needs to implement millions of dollars of infrastructure upgrades. We are asking that the BLM require industry to share in additional infrastructure impact costs caused directly by the expansion of their industry in our community.

**Response**

The Revised Draft SEIS includes socioeconomic mitigation measures.

**Comment Number**            **LA-6-12-V-1****Comment**

The Town of Pinedale asks that the BLM protect the view areas of Pinedale and immediate environs.

**Response**

Thank you for your comment. Management of visual resources is conducted in conformance with the RMP.

**Comment Number**            **LA-6-13-SE-7****Comment**

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 SEIS.

**Response**

Chapter 4 of the Revised Draft SEIS provides estimates of population increases under each alternative by year.

**Comment Number**            **LA-6-14-SE-8****Comment**

By slowing the pace of development, school officials will be given additional time to properly serve the increase of students. Additional growth impact monies were also removed from our school districts by the legislature (through a voter amendment), taking away additional financial flexibility from our school officials. These impacts need to be addressed in the SEIS.

**Response**

BLM developed Alternative E in response to comments on slowing the pace of development.

**Comment Number**            **LA-6-15-SE-9****Comment**

The Town of Pinedale asks that the BLM slow the pace of field development to allow our community adequate time to increase our medical and emergency services as needed.

**Response**

BLM developed Alternative E in response to comments on slowing the pace of development.

**Comment Number**            **LA-6-16-W-1**

**Comment**

Because of the increased encroachment onto key animal habitat and the effects from those actions, we ask that the Supplemental Environmental Impact Statement (SEIS) include a way to effectively monitor and restrict impacts of this increased gas field development to insure there are not additional declines in wildlife populations.

**Response**

Thresholds have been established in Alternative D, but whether triggering an immediate reduction in drilling is a feasible option remains to be seen.

**Comment Number**            **LA-6-17-W-2**

**Comment**

The SEIS should include a mechanism for maintaining big game distributions on or adjacent to, the current project area crucial big game winter habitats.

**Response**

Impacts to big game habitats have been disclosed in Chapter 3 and Chapter 4 of the revised Draft SEIS. Various approaches to maintaining big game use of the PAPA have been advanced and incorporated in Alternatives. Whether any approach will be successful given implementation of any alternative is unknown.

**Comment Number**            **LA-6-18-W-3**

**Comment**

The SEIS should include protections to maintain big game migration routes so that traditional year-round seasonal ranges continue to be used.

**Response**

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years. Lease suspensions could coincide with migration routes.

**Comment Number**            **LA-6-19-W-4****Comment**

It is important that the SEIS provide adequate amounts of suitable undisturbed crucial winter range to maintain big game distribution at any point in time during development.

**Response**

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years. As disclosed in the revised Draft SEIS, the reduced use of habitats and diminished distribution of wildlife as a result of impact, including use of leks by sage-grouse or winter range by big game, is expected to lead to greater risk of stochastic events adversely affecting the more confined population. A more confined population is also subject to density-dependent effects, which eventually cause declines. There will be undisturbed winter range on-site and off-site, but as noted in other responses to commenters, BLM can not legally require provisions for off-site mitigation.

**Comment Number**            **LA-6-20-W-5****Comment**

The SEIS does not address drilling stipulations outside of the Anticline crest. No exceptions to seasonal wildlife stipulations should be permitted outside of Concentrated Development Areas.

**Response**

Alternative D, not Alternative A, is the BLM's Preferred Alternative. Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years.

**Comment Number**            **LA-6-21-W-6****Comment**

The SEIS fails to provide limitations on the number, location, or season in which delineation wells will be drilled. Delineation should be limited by number and to areas near "Concentrated Development Areas," and restricted by all seasonal wildlife stipulations.

**Response**

Proposed drilling of delineation wells has been elaborated on within the BLM's Preferred Alternative, Alternative D, which was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality).

**Comment Number**            **LA-6-22-W-7****Comment**

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 SEIS will be effective.

**Response**

BLM has set forth Standard Practices and Restrictions for the Pinedale Anticline Project Area in Appendix 4 of the revised Draft SEIS. The Operators have prepared a Wildlife and Habitat Mitigation Plan for Alternative B in Appendix 9A and prepared a Wildlife and Habitat Mitigation Plan for Alternative D in Appendix 9C. The Wildlife Monitoring and Mitigation Matrix in Appendix 10 in the Revised Draft SEIS proposes wildlife trend thresholds for multiple species, mitigation, and mitigation ratios to be implemented once population declines have been detected.

**Comment Number**            **LA-6-23-W-8****Comment**

The SEIS needs to provide ways to protect water quantity, water quality, aquatic habitat components (including riparian areas), habitat connectivity and distribution of sensitive fish.

**Response**

BLM has set forth Standard Practices and Restrictions for the Pinedale Anticline Project Area in Appendix 4 of the revised Draft SEIS. The Operators have prepared a Wildlife and Habitat Mitigation Plan for Alternative B in Appendix 9A and prepared a Wildlife and Habitat Mitigation Plan for Alternative D in Appendix 9C.

**Comment Number**            **LA-6-24-W-9****Comment**

Insure occupied habitat for shrub-dependent species is well distributed throughout the project area.

**Response**

Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years. In the PAPA EIS of 2000, BLM recognized the difficulties in re-establishing sagebrush. In Section 4.16.3.1 of the revised Draft SEIS, BLM stated that the continued direct impact to sagebrush and other native vegetation types is expected under each Alternative due to removal of vegetative cover and the long re-growth timeframe of shrubs.

**Comment Number**            **LA-6-25-W-10****Comment**

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 and pronghorn and sage grouse studies for the life of the field.

**Response**

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include an expected \$36 million for a mitigation and monitoring fund.

**Comment Number**            **LA-6-26-W-11****Comment**

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.

**Response**

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include an expected \$36 million for a mitigation and monitoring fund.

**Comment Number**            **LA-6-27-W-12****Comment**

The BLM must address the cumulative impacts leading to the decreased regional habitat function.

**Response**

Cumulative Impacts to wildlife are described in Section 4.20.4 of the revised Draft SEIS and include factors that are assumed to lead to decreased habitat function.

**Comment Number**            **LA-6-28-GW-1****Comment**

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 planning addressing these two severe impacts on the area's aquifer?

**Response**

Water quality and quantity are the purview of the State of Wyoming - WDEQ; however, many of the PAPA Operators are currently recycling and reusing large amounts of their water to reduce the impact to groundwater. The BLM has no control over the severity of drought; however, BLM is aware of that energy-related water withdrawals can exacerbate the problem and BLM has actively encouraged recycling and reuse.

**Comment Number**            **LA-6-29-AQ-1**

**Comment**

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.

**Response**

This is outside the scope of analysis for the SEIS. Please submit your request to the USFS.

**Comment Number**            **LA-6-30-G-4**

**Comment**

We support the request from the Governor's office that the SEIS require zero days of visibility impairment and an 80 percent NO<sub>x</sub> 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.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-31-AQ-2**

**Comment**

Specific time periods for air quality mitigation measures to be fulfilled.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-32-AQ-3****Comment**

Identification of the responsible parties for complete these mitigation measures and identify personnel who will keep track of the required monitoring and mitigation

**Response**

See the Revised Draft SEIS, specifically Alternative D.

**Comment Number**            **LA-6-33-AQ-4****Comment**

Specifics outlining how that information will be reported back to involved agencies and the general public.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-6-34-AQ-5****Comment**

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.

**Response**

Thank you for your comment.

**Comment Number**            **LA-6-35-AQ-6****Comment**

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.

**Response**

BLM will track and report source emissions in the PAPA.

**Comment Number**            **LA-6-36-AQ-7****Comment**

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 if all specified actions are being done? We support recommendation of the Task Group to follow the example of Jonah Infill ROD, Appendix A, Air Quality Item 2.

**Response**

BLM will track and report source emissions in the PAPA.

**Comment Number**            **LA-6-37-AQ-8****Comment**

We also support the PAWG recommendations pertaining to the Southwest Wyoming Monitoring Network Assessment. And that all Wyoming Department of Environmental Quality Standards need to be met.

**Response**

Thank you for your comment.

**Comment Number**            **LA-6-38-G-5****Comment**

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.

**Response**

See the Revised Draft SEIS, Alternatives D and E.

**Comment Number**            **LA-6-39-G-6****Comment**

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

**Response**

See the Revised Draft which contains thresholds for impacts to air quality and wildlife.

**Comment Number**            **LA-6-40-G-7**

**Comment**

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.

**Response**

Thank you for your comment. This is contained within the scope of alternatives analyzed in the Revised Draft SEIS.

**Comment Number**            **LA-7-1-PA-1**

**Comment**

It is of major concern that the no consideration has been given to the location of produced water disposal facilities on BLM administered lands within or adjacent of the project area.

**Response**

All produced water which is generated is either treated on site by WDEQ-WQD, WOGCC, and BLM approved facilities or at a WDEQ-WQD approved commercial treatment facility or at a WOGCC approved deep injection disposal well. It is not possible for the BLM to predict the proposed location of future facilities. If the actions were to be proposed on BLM-administered surface, the authorization would require appropriate level of environmental analysis.

**Comment Number**            **LA-7-2-T-1**

**Comment**

Additionally there is significant increase in truck traffic, which adversely affects County and State road condition and law enforcement. These are serious issues that need to be addressed in this document.

**Response**

This has been discussed in the Revised Draft SEIS.

**Comment Number**            **LA-7-2-PA-2****Comment**

BLM should also consider a plan amendment to allow discharge of produced water on public land, thereby mitigating the adverse impacts on private land.

**Response**

Thank you for your comment. A plan amendment is outside the scope of this analysis.

**Comment Number**            **LA-7-3-GR-1****Comment**

The impacts to grazing resources and ranch economics must be re-analyzed to fully disclose impacts from loss of forage.

**Response**

The Revised Draft SEIS adequately analyzes the impacts.

**Comment Number**            **LA-7-4-GR-2****Comment**

The suggestions by Wyoming Department of Agriculture need to include the formal involvement of the county, conservation district, and the grazing permittees in any post Record of Decision entity.

**Response**

Thank you for your comment. BLM will consider this when issuing a decision.

**Comment Number**            **LA-7-4-GR-3****Comment**

Alternatively, BLM should facilitate the coordinate by designating a contact person within BLM, the operators and permittees. This group should then decide methods of communication and need for meetings.

**Response**

Thank you for your comment. BLM will consider this when issuing a decision.

**Comment Number**            **LA-7-5-GR-4****Comment**

Mitigation should include range improvement projects, water development and vegetation rehabilitation.

**Response**

Thank you for your comment. See the Revised Draft SEIS.

**Comment Number**            **LA-7-5-GR-5****Comment**

The Draft SEIS also needs to recognize the important role that the conservation district plays by virtue of its statutory jurisdiction and expertise. In the context of monitoring reclamation, both the district and the permittees should be directly involved.

**Response**

Thank you for your comment. BLM fully recognizes the role of the Sublette County Conservation District.

**Comment Number**            **LA-7-6-G-1****Comment**

Both local government agencies should be a member in any coordination group.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-7-G-2****Comment**

Sublette County and Sublette County Conservation District support the WDA discussion regarding mitigation measures and the comments on compensatory mitigation.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-8-T-2****Comment**

It is the County's position that roads that service more than three wells have dust control provided on a regular basis and those roads that service more than fifty wells should be paved.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-9-SE-1****Comment**

Analysis of impacts on local demands needs to be corrected throughout the document and the Draft SEIS needs to further identify actions that might reduce these adverse effects.

**Response**

Chapter 4 of the Revised Draft SEIS provides estimates of population increases under each alternative by year. It is beyond the scope of this SEIS to produce a budgetary planning analyses specific to the affected counties and communities.

**Comment Number**            **LA-7-10-T-3****Comment**

Here (Table 1) and in Chapter 4 the impacts to County and municipal roads and streets must be reported.

**Response**

This has been discussed in the Revised Draft SEIS.

**Comment Number**            **LA-7-11-SE-2****Comment**

The impacts on tourism and recreation for the lack of available motel or campground facilities must be reported.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-12-AL-1****Comment**

The SEIS fails to explain the rationale for Alternative C.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-13-AL-2****Comment**

Alt. C is not responsive to the proponent's need and right to develop their leases.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-14-PA-3****Comment**

Exception modifications and waivers should be allowed based on the nature of the disturbance its location, absence of species of concern and ability to mitigate impacts.

**Response**

Thank you for your comment. Exceptions will be processed according to the RMP.

**Comment Number**            **LA-7-15-PA-4****Comment**

Here the Draft SEIS prevents development and surface disturbance in DAs that have been fully developed. This text should be struck or rewritten to allow for maintenance or retrofit of production facilities or improvements that could lessen or mitigate impacts. Unless economically or technically infeasible seasonal closures would apply.

**Response**

Thank you for your comment. The BLM will consider this when issuing a decision.

**Comment Number**            **LA-7-16-PA-5****Comment**

The Draft SEIS fails to analyze and disclose the need to retain the seasonal closures in this area for sage grouse or to look at possible alternatives such as phasing development inside DA-5.

**Response**

See Revised Draft SEIS, specifically Alternative E that contemplates keeping seasonal restrictions which is provided for a comparison of impacts with those alternatives that allow for seasonal restrictions.

**Comment Number**            **LA-7-17-T-4****Comment**

Here and in Appendix C the discussions fail to recognize the County's statutory jurisdiction and right of involvement in transportation issues.

**Response**

Thank you for your comment, the jurisdiction of the county is recognized by the BLM.

**Comment Number**            **LA-7-18-W-1****Comment**

The SEIS needs to acknowledge the significant role that drought and predators play.

**Response**

The revised Draft SEIS has analyzed the role of drought (Appendix 14 in the Revised Draft SEIS) on mule deer wintering on the PAPA based on data provided by Wyoming Game and Fish Department and National Weather Service. There are no data that allow analysis of effects due to predators. The revised Draft SEIS notes that increased predation (of mule deer) can be a consequence of overcrowding and overutilization of unimpacted habitats during well field development.

**Comment Number**            **LA-7-18-W-2****Comment**

The failure to disclose and analyze role of predators suggests incorrectly that any population changes are solely due to development.

**Response**

There are no data that allow analysis of effects due to predators. The revised Draft SEIS does note that increased predation (of mule deer) can be a consequence of overcrowding and overutilization of unimpacted habitats during well field development.

**Comment Number**            **LA-7-19-T-5**

**Comment**

Some of the measures proposed here could be construed to apply to county roads over which BLM has no authority.

**Response**

Thank you for your comment, the jurisdiction of the county is recognized by the BLM.

**Comment Number**            **LA-7-20-T-6**

**Comment**

The permittee and County should have input on any issue that affects their access or other rights or responsibilities.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-21-W-3**

**Comment**

The definition of the term "active nest" should be added to glossary to prevent misinterpretation of the meaning.

**Response**

Thank you for your comment.

**Comment Number**            **LA-7-22-G-3**

**Comment**

These paragraphs must be rewritten to comply with IMP2005-069.

**Response**

Thank you for your comment. The BLM will consider this when issuing a decision.

**Comment Number**            **LA-7-23-GR-6**

**Comment**

Mitigation should extend to livestock grazing permittees and affected communities.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-24-G-4**

**Comment**

The activities proposed here can be accomplished by the group above.

**Response**

Thank you for your comment. The BLM will consider this when issuing a decision.

**Comment Number**            **LA-7-25-SE-3**

**Comment**

As a result the development jobs, earnings and related effects are overstated by a factor of about 8. This is a significant error resulting in a major misrepresentation of both the effects during development, as well the economic contraction that would occur post-development, e.g., see the discussion on 4-24 and 4-25.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-26-SE-4**

**Comment**

As presented the discussion (of second homes) is inconsistent with Census Bureau definitions.

**Response**

The text was changed to read "seasonal, occasional, or recreational use".

**Comment Number**            **LA-7-27-SE-5****Comment**

However, that is not the same as "no activity".

**Response**

The text has been changed from "no activity" to "not reported" as it relates to this comment.

**Comment Number**            **LA-7-28-SE-6****Comment**

Revise the first sentence. As written, this sentence leaves the reader with the impression that Sweetwater County, as a unit of local government, limits the disclosure of the industry earnings.

**Response**

The text has been revised to indicate that Sweetwater County reported mining earnings.

**Comment Number**            **LA-7-29-SE-7****Comment**

Total Employment in Sublette County 2004 should be corrected to 5,204.

**Response**

The table has been updated to 2005.

**Comment Number**            **LA-7-30-SE-8****Comment**

Clarify the text and change the title to the table.

**Response**

The text and table in Chapter 3 have been revised as suggested.

**Comment Number**            **LA-7-31-SE-9****Comment**

Revise the text to describe the functioning of the Wyoming School Facilities Commission with respect to school capacity, construction and closure.

**Response**

The text has been revised to describe the function of the Wyoming School Facilities Commission with respect to school capacity, construction and closure.

**Comment Number**            **LA-7-32-SE-10**

**Comment**

Revise the narrative to correct factual errors and more clearly portray local fiscal conditions and the contributions of energy development to those conditions.

**Response**

The narrative has been corrected in Chapter 3.

**Comment Number**            **LA-7-33-SE-11**

**Comment**

Clarify that severance and federal mineral royalties play a very minor role in Sublette County finances.

**Response**

The narrative in Chapter 3 has been revised to clarify that severance taxes and federal mineral royalties play a very minor role in Sublette County finances.

**Comment Number**            **LA-7-34-SE-12**

**Comment**

Revise the text and table to reflect that the severance taxes described are based on production occurring from development in Sublette County. However the tax distributions do not accrue to Sublette County.

**Response**

The narrative in Chapter 3 has been revised to indicate that the severance taxes do not accrue to Sublette County.

**Comment Number**            **LA-7-35-SE-13**

**Comment**

Correct the statement that 50 percent of the FMR are returned to the state.

**Response**

The statement that 50 percent of the FMR are returned to the state has been revised to reflect the administrative fees.

**Comment Number**            **LA-7-36-SE-14**

**Comment**

Revise and correct the estimates of employment and wages and salaries.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-37-SE-15**

**Comment**

Add a table showing the allocation formulas for severance taxes, including the caps on distributions to towns, cities and counties.

**Response**

A table has been added to Chapter 4 showing the allocation formulas for severance taxes, including the caps on distributions to towns, cities and counties.

**Comment Number**            **LA-7-38-SE-16**

**Comment**

Revise to correctly portray the allocation of Federal Mineral Royalties under Wyoming statutes.

**Response**

Chapter 4 has been revised to correctly portray the allocation of Federal Mineral Royalties under Wyoming statutes.

**Comment Number**            **LA-7-39-SE-17**

**Comment**

Revise to describe the role of recapture provisions related to education funding and ad valorem taxation.

**Response**

The text in Chapter 4 and the table have been revised to correctly portray recapture provisions related to education funding and ad valorem taxation.

**Comment Number**            **LA-7-39-SE-18**

**Comment**

The statement following Table 4.3-5 is incorrect as it ignores the recapture provisions.

**Response**

The text in Chapter 4 and the table have been revised to correctly portray recapture provisions related to education funding and ad valorem taxation.

**Comment Number**            **LA-7-40-SE-19**

**Comment**

The assumptions regarding tax revenues generated should be footnoted "Based on 2005 gas prices and tax rates."

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-40-SE-20**

**Comment**

A footnote should also be included indicating that the ad valorem taxes include amounts that would leave the county to support the school foundation program.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-41-SE-21**

**Comment**

The present values of the earnings streams should be recalculated.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-42-SE-22****Comment**

The discussions of post-development economic contractions need to be revised to reflect the revised employment projections.

**Response**

Please see the Revised Draft SEIS.

**Comment Number**            **LA-7-43-SE-23****Comment**

The projections of the FMR to Wyoming should be revised to reflect the administrative fees.

**Response**

The projections of the FMR to Wyoming have been revised in Chapter 4 to reflect the administrative fees.

**Comment Number**            **LA-7-44-SE-24****Comment**

The projections of FMR to Wyoming and severance taxes should be disaggregated to show the total distributions to cities, towns and counties, as compared to those retained by the state, assuming that the statewide caps are met each year.

**Response**

See Chapter 4 of the Revised Draft SEIS - FMR projections of FMR and severance taxes have been disaggregated to show the total distributions to cities, towns, and counties, as compared to those retained by the state.

**Comment Number**            **LA-7-45-SE-25****Comment**

There is no attempt to quantify these costs in the DEIS. Not only does the BLM need to estimate in a reasonably detailed way for each alternative such costs to the communities in order to provide an honest impact assessment, but the local municipalities need to see a "Revenues minus Costs" schematic in the PAPA DEIS in order to formulate an informed opinion.

**Response**

Chapter 4 of the Revised Draft SEIS provides estimates of population increases under each alternative by year. It is beyond the scope of this SEIS to produce a budgetary planning analyses specific to the affected counties and communities.

**Comment Number**            **LA-7-46-SE-26**

**Comment**

The DEIS must disclose how increased job creation related to PAPA development will impact the current context of full employment and workforce shortages and how each of the different alternatives will affect these impacts. A sweeping assessment that merely states, "more is better" regarding increased employment is utterly inadequate when faced with an existing context of full employment.

**Response**

The Revised Draft SEIS provides a range of estimated population increases under each alternative by year. Project-related employment (number of workers) is also estimated for each Alternative.

**Comment Number**            **LA-7-47-SE-27**

**Comment**

The DSEIS must disclose the negative impacts of a non-local workforce, along with the positive impacts.

**Response**

Chapter 4 of the Revised Draft SEIS provides a qualitative discussion of the negative impacts of a non-local workforce along with the positive impacts.

**Comment Number**            **LA-7-48-SE-28**

**Comment**

The "Boom and Bust Characteristics" need to be expanded.

**Response**

Chapter 4 of the Revised Draft SEIS provides a discussion of the boom/bust scenario in a rural setting where growth is driven by oil and gas development.

**Comment Number**            **LA-7-48-SE-29****Comment**

Either way, the effects on the overall stability of the economy in the context of an extra decade of gas-field economic dependence needs to be expanded.

**Response**

Chapter 4 of the Revised Draft SEIS provides a discussion of the boom/bust scenario in a rural setting where growth is driven by oil and gas development.

**Comment Number**            **LA-7-49-SE-30****Comment**

The DSEIS must eliminate this contradiction. If PAPA development will not affect the population, then the DSEIS needs to provide a detailed justification as to why this is so. More realistically, the DSEIS needs to explain how the different alternatives will each affect the population estimates.

**Response**

The Revised Draft SEIS provides estimates of population increases under each alternative by year.