



WYOMING GAME AND FISH DEPARTMENT

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July 8, 2009

WER 9580.18
Bureau of Land Management
Buffalo Field Office
Environmental Assessment and
Findings of No significant Impact for the
Augusta Unit Zeta CBNG POD

Tom Bills
Bureau of Land Management
Buffalo Field Office
1425 Fort Street
Buffalo, WY 82834-2436

Dear Mr. Bills:

The staff of the Wyoming Game and Fish Department has reviewed the Environmental Assessment and Findings of No significant Impact for the Augusta Unit Zeta CBNG POD. We offer the following comments for your consideration.

Terrestrial Considerations:

The EA has described the affected environment, disclosed potential impacts, and incorporated measures to reduce negative impacts to other resources while allowing the CBNG resource to be extracted. We appreciate BLM's effort to consider the wildlife resource.

The EA discloses that previously existing security habitat for elk within the planning area has already been negatively compromised by the actions to develop the CBNG resources on fee lands. Because of the compromised security habitat that has already occurred, we strongly recommend that seasonal stipulations to protect elk on crucial winter ranges and parturition areas be strictly adhered to. In addition, during other times of the year, efforts should be made to lessen the amount of disturbance to elk by consolidating trips, using remote monitoring, and practicing other activities so that human presence is reduced in the area. The negative impacts to elk in the Augusta Zeta planning area that have already occurred coupled with the expected impacts to come from this project provide additional emphasis to assuring that very strict measures be applied in the nearby Fortification Creek planning area to maintain those security areas.

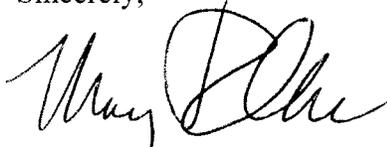
The proposed number of CBNG well in the Augusta Zeta unit will likely further reduce sage grouse numbers in the planning area. The EA did disclose that the project area is not within a BLM "Focus Area" or State of Wyoming designated "Core Area". However, these in between areas do potentially provide for connectivity and genetic exchange (gene flow) between populations. We suggest BLM provide for maintenance or sustainability of intact leks within these areas. We also recommend BLM adhere to appropriate stipulations for raptors and other sensitive species to reduce disturbance and maintain sufficient habitat.

Aquatic Considerations:

We have no aquatic concerns pertaining to this project.

Thank you for the opportunity to comment.

Sincerely,



for John Emmerich
Deputy Director

JE: MF: gfb

cc: USFWS
Duane Spencer, BLM Buffalo Office
Paul Mavrakis, Sheridan Region Fisheries Supervisor