



Matt Anderson, Project Lead
 Bureau of Land Management
 P.O. Box 768
 Pinedale, Wyoming, 82941
 WYMail_PAPA_YRA@Blm.gov

U.S. Bureau of Land Management, Pinedale Field Office

Dear Matt Anderson,

Habitat for Wildlife would like to see the following changes made to the PAPA SEIS:

- (1) We would like to see the BLM enforce 3:1 offsite mitigation, and give a definition of what that would include.
- (2) We would like to see the BLM commit to a strong monitoring program, and not just turn it over to the petroleum companies.
- (3) The U.S. Fish and Wildlife Service has stated several times to the BLM that flagging is an ineffective method for preventing migratory bird fatalities, and should not be permitted as a single deterrent. We feel that the BLM has an obligation to enforce more effective methods, such as netting, to prevent migratory bird fatalities.
- (4) The BLM committed to protect the sage grouse, rather than just doing studies about them. We feel that there is adequate information already available on what resources are needed to sustain sage grouse populations. The BLM has an obligation to implement available practices that will benefit this species.
- (5) We would like to see the BLM commit to a certain population number for the mule deer and antelope herds. From our understanding, the Fish and Game has a current population objective of 32,000 deer for the Sublette mule deer herd, with a total population of around 26,000 to 28,000 deer currently documented. We would like to see the BLM commit to do all within their power to never allow the deer herd population to drop below a level close to around 26,000 deer within this region. We would like to see what practices and methods the BLM will commit to use to accomplish this goal, and these practices and methods need to be more than just studies on how terribly the wildlife populations are being affected. The wildlife studies produced by third party sources hired by the BLM have also shown that winter restrictions are ineffective in preventing drastic declines in the wildlife populations. We know that adequate offsite mitigation, if done effectively, would set aside a refuge for these wildlife populations to survive in throughout the life of the gas development.

(1)

Habitat for Wildlife-918 West 2525 South, Syracuse Utah 84075

W-1
 G-1
 W-2
 W-3
 W-4
 W-5
 W-6
 EG-18-1
 EG-18-2
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 EG-18-5

We appreciate the opportunity to comment on the SEIS and hope that you will implement the above statements. Thanks for your time.

Sincerely,

Ed Dayton
President
Habitat for Wildlife