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bcc
Subject Thompson's comments on Pinedale SEIS

To the Good Folks at BLM:
Here are my comments on the Anticline SEIS that I presented verbally on February 13, 2007.
The Pinedale Round-up carried a story on March 1 that the deadline for the comments is now April 7.
The National Wildlife Federation staff will present additional written comments.
Thank You.

Craig D. Thompson, PE
Western Region Vice Chair
Board of Directors

National Wildlife Federation

Thompson - Comments on Anticline SDEIS 02.07.doc

Good Evening! My name is Craig Thompson. I will speak this evening on behalf of the National Wildlife Federation. You heard earlier from one of our affiliate organizations – the Wyoming Wildlife Federation represented by Armond Acri. The National Wildlife Federation is America's largest conservation organization with over five million members and supporters. We are a grassroots organization with 47 state and territorial affiliates. I am not a paid lobbyist from Washington but a volunteer leader – a teacher from Rock Springs. I serve NWF as the western Regional vice-chair of the board of directors.

I am a hunter who uses the lands this proposal covers and a fisherman who fishes waters that drain these lands. I have worked in this county and own property here. I will be affected by this proposal. I think I have standing to comment on this proposal if this was a court of law. It is not a court hearing but I do appreciate the opportunity to comment.

My friends in the gas industry keep telling me that we have a world-class natural gas resource in the Pinedale Anticline. It must be a world class resource given all the attention it is drawing. But before this world-class resource was discovered we had a world-class wildlife resource that also drew national attention. That resource is the focus of my comments this evening.

I also wish to draw attention to a statement in the Pinedale Anticline Draft SEIS p viii. "Big Game would continue to be adversely affected by well field development that causes direct loss of crucial winter range, other seasonally-used habitat, and decreased habitat function near roads and well pads due to human activity."
This is unacceptable.

This statement puts the gas resource above that of wildlife and habitat. I do not believe it is consistent with the Multiple Use and Sustained Yield Act. This act says that there is a qualitative difference between land uses that would develop non-renewable resources like gas and those uses that are sustainable – like wildlife. One use of the land should not trump all other uses.

G-1
EG-17-1

…directing comments to the hearing officer…
You asked for comments on this draft that we believe to be in error, I would ask you to review this decision in light of the Multiple Use and Sustained Yield Act.

What does National Wildlife Federation want for this land in light of this proposal?
I think we want the same thing that everyone in this room wants. I think we want the same thing that the companies want. I think we want the same thing that the Wyoming Game and Fish wants.
We want this proposal to have the minimum impact on wildlife.

…. directing comments to the audience. …
Is there anyone from the companies, from the public, or from the agencies who does not want this?

Good, then the only question remains is, 'How do we minimize the impact?'
I have a plan.

W-1 | EG-17-2 |

1) We start by declaring a no-net-loss policy – a goal - for wildlife in the proposed area. Before you dismiss me as a starry eyed environmentalist, let me explain. I used the word net. That does not mean we don't lose any individual animals during development. It means that we would leave the word net up to the biologists to define using the best research data we have. It means we trust science to define the time period over which populations would come into equilibrium with the carrying capacity of the area. Once we declare this goal it becomes the goal for the public, for the companies, for the BLM, for the Game and Fish, for the NGOs and for the ranchers who graze this area. It becomes a community goal that everyone embraces – as we just did a few minutes ago- and a goal we work towards. Before the argument is made that the companies are in the gas business not in the wildlife business, I suggest that by choosing an area of world-class resources, the companies knew that this is a special place. These companies hire economists, they hire marketing folks, they hire statisticians, they hire engineers, they hire pipeline workers and they hire PR specialists. We have all seen the newspaper ads in which they claim to be a part of this community. The companies maintain that they are here to say. Let's believe them. I believe them when they say they are part of this community. Being part of this community means that they also care about our world-class wildlife values. I believe they should also hire a few wildlife biologists to protect those values.

W-2 | EG-17-3 |

2) We begin by adopting the minimum standards recommended by the WY G & F. I am distressed that Appendix C mentions that the adoption of most of the G & F minimum standards. How are we to interpret this? If these are the minimum standards then adoption of less than the minimum standards means sacrificing wildlife. That is plain and simple.

G-2 | EG-17-4 |

3) We cooperate. Minimizing impacts will require uncharacteristic cooperation between companies, between agencies, and uncommon patience on the part of the public and the NGOs.

PA-1 | EG-17-5 |

4) We go slow and develop the core in a linear fashion to minimize the disturbance to N > S migration. Choose the well locations with wildlife impacts in mind. Minimizing impacts might mean deferred locations but leaving natural gas in the ground might mean higher profits in the long run.

PA-2 | EG-17-6 |

5) We stay light on our feet. The BLM calls this adaptive management. To us it means we learn lessons along the way and we don't repeat mistakes.

PA-3 | EG-17-7 |

6) We get ready to mitigate. The scale of both the company's proposal and the BLM's preferred alternative is so massive that mitigation both on-site and off-site has to be planned for to achieve our objective.

SE-1 | EG-17-8 |

7) We safe guard local quality of life. Again this calls for community impact assistance and a new paradigm our new neighbors the gas developers.

AQ-1
EG-17-9

8) We take special notice of air quality concerns.

I see my time is up. If anyone is interested in my plan, my contact information is on the sign-up sheet. NWF staff will also submit written comments.
Thank You.