



United States Department of the Interior
 NATIONAL PARK SERVICE
 Intermountain Regional Office
 12795 West Alameda Parkway
 Denver, Colorado 80225



March 1, 2007

Memorandum

To: Matt Anderson, Project Lead, Bureau of Land Management, Pinedale Field Office, P.O. Box 768, Pinedale, WY 82941

From:  Cheryl Eckhardt, NEPA/106 Specialist, National Park Service, Intermountain Regional Office

Subject: Comments on DES 06/0054, Pinedale Anticline Oil and Gas Exploration and Development Project

Thank you for the opportunity to comment on the proposal for long-term development of natural gas resources in the Pinedale Anticline Project Area (PAPA). Grand Teton National Park (GTNP) would like to offer the following general comments concerning the proposal:

Wildlife

We appreciate your efforts to consider spatial and temporal limitations of oil and gas development, as outlined in Alternative C, as a way to address resource impacts, including those to wildlife. Notwithstanding, we remain concerned about the large scale and pace of energy development in this and adjacent areas, increasing levels of human disturbance to Wyoming's wildlife at critical times of year, and direct and indirect loss of crucial habitats. Our comments are offered in the interest of maintaining the ecological integrity of the southern Greater Yellowstone Ecosystem, particularly the diverse wildlife species that depend on the PAPA for crucial seasonal ranges.

Our main concern is with potential impacts of the proposal on pronghorn antelope and mule deer. Both these species winter in and adjacent to the PAPA project area and a small number of these animals seasonally migrate to summering areas in and near GTNP. Both species are an integral component of an intact wildlife assemblage in GTNP and their presence provides a unique opportunity for park visitors to view these animals in a spectacular mountain setting. We are actively working with cooperators to conserve the pronghorn migration corridor, but the long-term persistence of this species in the park can only be assured by also providing secure wintering and transitional habitats. Likewise, conservation of the Pinedale Front mule deer migration route and crucial winter ranges on the PAPA are essential to the persistence of this migratory deer population.

Recent research has documented declines in mule deer populations and impacts to pronghorn habitat use from gas field activities. Despite these negative trends the Draft SEIS calls for further development, but provides no assurances that certain population levels of these species will be maintained throughout the development process. The proposal does not identify population or habitat thresholds or trigger points for pronghorn and mule deer that would signal a need for change in wellfield development (either temporally

W-2
 W-1

FA-5-1

W-3 W-2
FA-5-1 | or spatially). We are concerned that additional impacts could initiate further declines that could lead to the eventual loss of pronghorn and mule deer from GTNP and the surrounding area.

W-4
FA-5-2 | The benefit of staged development to wildlife hinges on the success of reclamation and revegetation efforts. It is not clear in the proposal if reclaimed areas would need to meet certain habitat objectives before development of new areas could occur or if intact core areas of crucial ranges would remain available to wildlife throughout the development process. We support continued research and monitoring to identify critical trigger points and evaluate the success of reclamation efforts and effectiveness of mitigation measures intended to benefit wildlife. We strongly encourage that data and information from these studies be used to adapt development plans in space and time to ensure that resource impacts are minimized.

Air Quality

Grand Teton National Park (GTNP) is a Class I area within the range of this project. Clean air is a fundamental resource of the park and visitors place a high value upon unimpaired views of the spectacular Teton Range. Modeled impacts show up to 16 days above 0.5 dv change (for the proposed action) while during the early-project development stage. Thus, it is believed that the Pinedale Anticline Project could have a significant impact on air quality at Grand Teton National Park, even prior to the addition of cumulative impacts.

AQ-1
FA-5-3 | While the BLM examined the impacts of atmospheric deposition on sensitive lakes within the wilderness areas, it did not look at national park areas for this analysis. Nitrogen and sulfur deposition are causes of concern for sensitive lakes in the national parks in northwest Wyoming. In Grand Teton National Park several lakes, particularly Delta, Surprise, Amphitheater, Mica and Lake Solitude have all been identified as being acid sensitive and should have been included in the analysis.

AQ-2
FA-5-4 | Visibility monitoring should be required, especially at Grand Teton National Park. An IMPROVE monitor should be funded and installed at Grand Teton National Park to track visibility impacts. The recommended location for the monitor is in the southern part of GTNP, where air masses from the project area might impact park views.

AQ-3
FA-5-5 | Modeled cumulative NOx emissions suggest that it would also be advisable to monitor nitrogen inputs to the GTNP, particularly at high elevations. Recommended monitoring would include:

- NADP/NTN wet deposition to be located near Moose, WY, with access to line power
- Monitoring of total deposition at high elevation stations in the alpine using resin exchange columns

Thank you for the opportunity to provide these comments. If you have any questions related to these comments, please contact Jennifer Carpenter, Resource Planner, Grand Teton National Park at (307) 739-3465.

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March 5, 2007

Memorandum

To: Matt Anderson, Project Lead, Bureau of Land Management, Pinedale Field Office, P.O. Box 768, Pinedale, WY 82941

From:  Cheryl Eckhardt, NEPA/106 Specialist, National Park Service, Intermountain Regional Office

Subject: Supplemental Comments on DES 06/0054, Pinedale Anticline Oil and Gas Exploration and Development Project

Following are additional comments to supplement our memorandum dated March 1, 2007. The National Park Service has reviewed this project in relation to any possible conflicts with the Land and Water Conservation Fund (L&WCF) and the Urban Park and Recreation Recovery programs. The following projects are located in the Pinedale area so the possibility of impacting such properties is real:

56-00138 & 368, Pinedale Municipal Park
 56-00433; Pinedale Tennis Courts
 56-00525, Pinedale Community School Pool
 56-00677 & 745, Pinedale Ballfields
 56-00810, Pinedale American Legion Park
 56-00528 & 639, Marbleton Town Park

We recommend you consult directly with the official who administers the L&WCF program in the State of Wyoming to determine any potential conflicts with section 6(f)(3) of the L&WCF Act (Public Law 88-578, as amended). This section states:

"No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the ten existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location."

The administrator for the L&WCF program in Wyoming is Ms. Mary Moore Grants Coordinator, Wyoming Division of Parks and Recreation. Ms. Moore's phone number is 307-777-5598.

Thank you for the opportunity to provide these supplemental comments. If you have any questions regarding the above comments, please contact Terree Klanecky, Outdoor Recreation Planner, Midwest Region, (402) 661-1556.

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 FA-5-6

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