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Bureau of Land Management
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Dear Bureau of Land Management:

I am writing to comment on the Pinedale Anticline Project Area (PAPA) Draft Supplemental Environmental Impact Statement (DSEIS) that was recently released by the Pinedale Field Office. I am sorry for the near-tardiness of my comment submittal.

I am currently employed by the Sublette Community Partnership as the Sublette County Socioeconomic Analyst under funding administered by the Sublette County Commissioners. Analyzing the socioeconomic impacts to Sublette County due to natural gas development is currently my expertise.

First off, I would like commend BLM on producing a document that is far superior to the Jonah Infill Document that was released by the same field office a year or so previously. Particularly, I find the discussions regarding social and economic impacts from development in the PAPA DSEIS to be far more comprehensive, thoughtful, and honest than was the case with the Jonah Infill document (despite the sheer size of the Jonah Socioeconomic Technical Support Document). Impressive is the analysis regarding how the different alternatives may effect housing, population, and workforce (Appendix F), as well as the discussion regarding the current affected social and economic environments (Chapter 3), especially the population estimates.

In particular, the charts that detail the estimated rig-count for the proposals are particularly welcomed, useful, and impressive.

In addition, I realize that admitting the possibility of negative social and economic impacts from these energy developments has been a big step for the agency and I commend you for taking such an honest step. The impacts from energy development are going to forever be – at best – a “mixed bag”, and the preemptive recognition of both positive and negative impacts can produce an honest document that will hopefully aid local officials as this thing moves forward. *The very identification of the impacts at this stage might actually decrease the severity of those very impacts in the future* by giving locals a head start at trying to better them.

For this very reason, on the following pages, I would like to make a number of comments regarding socioeconomic analysis in the PAPA DSEIS. I have labeled them “positive criticisms”.

Overarching Positive Criticism: The articulation of socioeconomic impacts needs to be expanded.

You do a good job of describing the effected socioeconomic environment, but do a poor job of “pulling together” the impacts from the various alternatives. In the DEIS, you appear to do this in only two areas: Page V of the executive summary and Table 1 of Appendix F.

The following comments (labeled positive criticisms) may provide ways to expand your socioeconomic analysis:

SE-1
I-13-1

Positive Criticism Number 1: Non-resident workforce numbers are not adequately analyzed in the DEIS.

Rotational/transient/non-resident workers (who make up the majority of the gas-field workforce) are not included in either the affected environment (chapter 3) or the impacts associated with the different alternatives.

These non-resident workers produce huge strains on local services by creating huge demand but provide little-to-no workers to help provide these services. Furthermore, a small portion of these workers will eventually decide to become permanent residents in the area and a comprehensive tally of the amount of non-resident workers can give clues to the amount that will relocate. Currently, the non-resident workforce fluctuates greatly with the rig-count fluctuations due to the winter stipulations.

I understand that creating a current and future estimate of non-resident workforce numbers is a complicated, daunting task and commend you for providing preliminary estimates on Table 1 in Appendix F. But I believe a fluctuating chart (similar to the charts on the predicted rig counts) would be very beneficial. Luckily, the rig-count and well drilling times can provide a great tool for estimating the non-resident workforce. As you note in Table 1 in Appendix F, most of these workers are related to the development stage of field production, and pre-well development workforce numbers are available throughout the PAPA DEIS as well as the Jonah Infill FEIS.

I believe that with a little work, you can create not only a current non-resident workforce estimate, but also estimates on how and when this workforce population will change as the project moves forward. These estimates would be extremely helpful in my work, and the work of many others. If you would like to see how I calculate non-resident workforce numbers, I invite you to take a look at an essay of mine located at <http://www.sublette-se.org/outoftownessay.html>.

SE-2
I-13-2

Positive Criticism Number 2: The effects on the current workforce shortages and are not adequately described.

This is related to criticism number 1. As I assume everyone in the Pinedale Field office already knows, local employers across all industries are having great difficulty attracting workers and filling positions. According to the Bureau of Labor Statistics, and as noted in

the DEIS, Sublette County has one of the lowest rates of unemployment in the nation. How will the alternatives effect this situation? What effects might this have on local employers? How will this effect how people are paid in non-gas field industries? How will this in turn affect the rate of inflation? Again, this is only very briefly described in the Executive Summary on Page V.

SE-3
I-13-3

Positive Criticism Number 3: There is no discussion on the short-term or long-term effects to economic stability and economic diversity.

As the Wilderness Society has so eloquently described in their 2006 paper entitled THE ECONOMIC & SOCIAL IMPACTS OF OIL AND GAS DEVELOPMENT, energy extraction and the subsequent “Boomtown” environment almost invariably leads to economic instability and a loss of economic diversity. As noted below, in Sublette County a number of industries have actually grown smaller in the last 5 years despite big population growth. As the local economy gears inevitably towards natural gas production, how will these alternatives effect the stability and economic diversity of the region’s economy? How will the addition of over 4,000 wells over a span of a decade effect both short-term and long-term economic stability?

SE-4
I-13-4

Positive Criticism Number 4: Your stated impacts to the “LOCAL DEMANDS” section on Table 1 of Appendix F (page F-1) are utterly inaccurate.

I did not see exactly where in the document “Local Demands” is concretely defined (I may have missed it), but I assume it refers to Local Infrastructure, Services, and Facilities provided both by governmental and private organizations.

On page V of the Executive summary you state: *Increased populations are expected in Lincoln, Sublette, and Sweetwater counties which will negatively impact demand for local infrastructure, services, and facilities.*

On table 1 of Appendix F you state for all alternatives: *Local infrastructure, services, and facilities demand (are) being met.*

So, which on is it? And why?

At the present time, Local Infrastructure, Services, and Facilities are currently under huge strains due to population growth and problems associated with severe workforce shortages. Increased activity on the PAPA could only exacerbate these strains and problems. I strongly recommend you check into this and revise your impact estimates. I suspect if only asking local BLM employees of their experiences attempting to obtain local services would back up this clam. I even suspect that the BLM Pinedale Office itself is under huge strains and pressures due to workforce shortages.

Local service providers are struggling to keep up a transient/rotational gas-field workforce that offers huge demands for the services but little-to-know employment base to help provide these services. According to state data (Wyoming Department of

Employment Wages and Occupations Survey), the food and entertainment industries in Sublette County have actually *lost* numbers of both employees and employers in the last five years, despite a resident population increase of over 17%. Local restaurants continually close their doors due to workforce shortages. It can take weeks to get your car worked on or to get repairs done to your furnace.

The Town of Pinedale currently loses close to a million dollars each year to provide water and sewer services to an expanding population and would have to increase rates by over 300% to recoup these losses.

The Sublette County Sheriff's office has lost over 30 employees over the past couple years due to high costs of living and employment opportunities offered in other industries.

SE-5

I-13-5

Positive Criticism Number 5: I find it extremely hard to believe that the proposed/preferred alternative will have no impact on the area population.

As stated previously, the population growth estimates (Table 3.5-6) are very impressive and welcomed. However, in Table 1 of Appendix F you state that the proposed alternative of adding over 4,000 wells over an entire decade of development will not affect the population. Yet, on page V of the Executive summary you state: *Increased populations are expected in Lincoln, Sublette, and Sweetwater counties which will negatively impact demand for local infrastructure, services, and facilities.* So which is it? Again, I find the idea of no population impacts very hard to believe, especially for the adjacent relatively rural areas in Sublette Co. I would recommend that you revisit the effects the proposed alternative will have on population, and if you feel it will indeed have no further impact, I and many others would appreciate a justification for this statement, as it runs counter to almost every description of the local population growth dynamic that I have seen.

Thank you for your time. And again, I hope these comments will help BLM create an even better, more accurate, more honest, and better utilized FEIS.

Sincerely,

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