

Dear BLM:

I am writing this letter in regards to the Draft Supplemental EIS for the Pinedale Anitcline Oil and Gas Exploration and Development Project – 1793(930)1610. My family has lived and made a living on the Mesa for 100 years, and our ranching operation is dependent upon BLM grazing permits for the Mesa Common Allotment. I will comment on this document by page, section, and paragraph number.

Page 2-2, section 2.2.2 Summary of Concerns: I do not believe this section summarizes the concerns that I brought forward in the scoping process. Specifically this section does not address my comments as they relate to the grazing resource on the Mesa.

My comments about the grazing resource were:

- 1.) Reduce surface disturbance, because it results in a direct loss of rangelands
- 2.) Restriction of cattle movement by gas development activities
- 3.) Mitigation measures could restrict cattle use on undeveloped areas of the Mesa

Other comments not mentioned in the summary, but listed in my scoping letter:

- 1.) Safety hazard on county road 23-110, due to increased winter use
- 2.) Elimination of sage grouse stipulations may force the USFWS to list the species under the Endangered Species Act, which has huge repercussions for all users of the public domain. I also could not find this comment in Appendix B, which leads me to believe that you have not addressed the consequences of a potential listing of sage grouse as a result of this project, or more specifically the precedent it will set.

Page 2-23, section 2.4.2.3 Alternative B (The proposed Action), paragraph 4 states: “This would require temporary relaxation of stipulations where the CDA is active...during the seasonal restricted periods. This section should state what relaxation means. Webster says to make “less severe or stringent”, but do you really mean elimination instead of relaxation. Be clear and truthful.

Page 3-90, section 3.19.1: There is no mention of blockage of trailing corridors by pipelines still on blocks, but I have reported those instances to the BLM.

Page 4-103, section 4.17.1 Scoping Issues. This section failed to capture my scoping comment on pipeline construction restricting cattle movement, but section 4.17.3.1 does discuss soft plugs for pipeline trenches.

Page 4-106, section 4.17.3.3 states that there will be a significant impact to the grazing resource on the Mesa, which is where we have a grazing permit.

Page 4-107, section 4.17.4: This cumulative impact section does not talk about vegetation reduction as a result of dust or other impacts occurring to livestock producers.

Page 4-108, section 4.17.5: This section lists the mitigation measures for the grazing resource impacts. Under the proposed action alternative mitigation measures provided by

M-1/GR-5 I-20-8

the operators in Attachments 1 through 4 in Appendix C would apply. Mitigation measures that apply to livestock operators (the grazing resource) are virtually non-existent. There should be a mitigation section for the grazing resource. Livestock grazing permittees have held permits with the BLM since its inception, and should not be over-run by development of this gas field. Since Attachment 4 was listed as mitigation for impacts to the grazing resource then the bullet points, on page c-34 Compensation for Impacts, should apply to the grazing resource. Any mitigation fund which might be established by industry should have local ranchers on the board, and with equal footing to the WGFD. Any mitigation fund should have an assigned percentage specifically for mitigating impacts to livestock producers in the PAPA.

Components of a Grazing Resource mitigation section should include:

- M-2/GR-6 I-20-9
- 1.) Annual coordination meetings (late march – early April) between industry and livestock operators
  - 2.) A mitigation fund which includes rancher involvement on the board, and monies set aside specifically for grazing mitigation. No less than one third of the fund should be set aside for the grazing resource (rancher projects)
  - 3.) On-site mitigation projects for the grazing resource
  - 4.) Industry organized compensation program for livestock killed by traffic and development activities

TE-2 I-20-10

Page 4-125, section 4.20.1: Scoping issues section does not include my scoping issue that eliminating sage grouse seasonal stipulations could result in the USFWS listing the species under the Endangered Species Act. Further the SEIS did not evaluate the impacts that listing could have on all users of BLM lands in Sublette County and across the west. The BLM is setting a precedent by removing stipulations for sage grouse at a time when conservation of the species is paramount. By not including my scoping comments you attempt to ignore the issue, but I believe that is illegal.

TE-3 I-20-11

Page 4-139 and page 4-140, section 4.20.3.3: The SEIS states that sage grouse population declines are expected to be “more rapid and more extensive” than the under the no-action alternative. There is no analysis on what the projected extent of those declines is, or what those declines would mean to sage grouse in the Green River Valley.

GR-7/M-4 I-20-12

In conclusion, I believe the impacts to livestock operators have been under represented, and the mitigation measures to compensate for those impacts are non-existent. More emphasis needs to be placed into the document on the affects of mitigation projects to livestock permittees. Habitat improvement projects can be a benefit to all or a huge burden to livestock operators. A mitigation fund or part of a mitigation fund should be allocated specifically for livestock operators and the associated grazing resource.

M-5/SE-1 I-20-13

I believe the BLM completely ignored the issue of mitigation for socio-economic impacts to Sublette County from this project, including cumulative impacts from other gas projects. The BLM’s hands may be tied on this issue, but I would hope that industry would step up to the plate and create a mitigation fund for socio-economic related impacts. The stress on law enforcement, social programs, housing, day care, and other

M-5/SE-2

I-20-13

areas of the community need to be addressed by industry. Operators from other gas fields should be brought into this mitigation fund.

TE-4

I-20-14

The treatment of the sage grouse issue in the SEIS is inadequate, especially if actions in the SEIS threaten listing of the species. Industry sponsored research, Matt Hollaran's, indicates that current sage grouse stipulations are inadequate, but instead of utilizing its own research industry ignores it and proposes eliminating seasonal stipulations. Instead of addressing the threats to sage grouse industry is increasing the threats to the species, and threats to a species are one factor USFWS looks at in determining whether a species should be listed under the Endangered Species Act. I intend to resubmit my scoping comments, because it seems the preparers of the SEIS did not read all of my comments and my positions remain the same.

I do not support the proposed alternative, and no credible alternative was proposed which I can support.

Sincerely,



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