

SUBLETTE COUNTY, WYOMING
OFFICE OF COUNTY CLERK

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April 6, 2007

TO: Department of the Interior, Bureau of Land Management
FROM: Mary Lankford

RE: Pinedale Anticline Draft SEIS Comments
Second Submission, Additional Comments

On behalf of the Board of County Commissioners, please find attached supplemental comments dealing with social and economic issues from Sublette County, Wyoming. Sublette County Conservation District also concurs in these supplemental comments.

/s/ Mary L. Lankford

**Comment Form for Reviewers of the BLM PFO PINEDALE ANTICLINE DRAFT SEIS
April 6, 2007**

Commenter Name	Comment No.	Page	Section	Comment & Discussion:	
Sublette County and Sublette County Conservation District				Changes	Discussion
	1.			<p align="center"><u>General Comments:</u></p> <p>Produced Water Disposal It is of major concern that the no consideration has been given to the location of produced water disposal facilities on BLM administered lands within or adjacent to the project area. All proposals provide for movement of produced water out of the project area either by truck or pipeline or a combination thereof. The impacts of this activity outside the Project area boundaries have not been analyzed. Existing and proposed facilities are located on private lands, which by the nature of their settlement are located near residential and riparian areas. These facilities and their expansion have significant environmental impacts and adversely affect the local custom, culture, and economics. Agricultural lands are being converted to industrial use. This land conversion reduces lands available to meet increasing residential needs created by development.</p>	
	2.			<p>Additionally there is significant increase in truck traffic, which adversely affects County and State road condition and law enforcement. These are serious issues that need to be addressed in this document. BLM should also consider a plan amendment to allow discharge of produced water on public land, thereby mitigating the adverse impacts on private land.</p>	

PA-1

LA-7-1

PA-2

T-1

LA-7-2

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	3.	4-104		<p>Grazing In Environmental Consequences, the Draft SEIS acknowledges that significant impacts to grazing resources have already occurred. It goes on to say that future losses cannot be predicted since revegetation of disturbed surfaces would compensate for forage lost. This analysis fails to consider forage lost to surface disturbance such as roads and production facilities that are lost for the life of the project. There is also a significant gap in time between disturbance and successful reclamation during which the grazing permittee cannot graze all or a significant part of the allotment. The impacts to grazing resources and ranch economics must be re-analyzed to fully disclose impacts from loss of forage.</p>	
	4.			<p>One of the scoping issues raised was the need for coordination between livestock producers and operators on the Mesa. The BLM is not responsive to that request. The Draft SEIS provides for coordination on behalf of wildlife and there should be the same level of coordination for livestock. Both livestock grazing and wildlife are principal multiple uses in FLPMA and enjoy equal legal footing. Thus, the Draft SEIS needs to be revised to recognize there is no wildlife preference. The suggestions by Wyoming Department of Agriculture need to include the formal involvement of the county, conservation district, and the grazing permittees in any post Record of Decision entity. Alternatively, BLM should facilitate the coordinate by designating a contact person within BLM, the operators and permittees. This group should then decide methods of communication and need for meetings.</p>	

GR-1

GR-2
GR-3

LA-7-3

LA-7-4

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	5.			<p>Mitigation for Impacts on Livestock Grazing Sublette County and Sublette County Conservation District support specific mitigation measures to address adverse impacts on the ranches that will be displaced during development. Mitigation should include range improvement projects, water development and vegetation rehabilitation. To date the focus on mitigation is largely on wildlife, which does not address the potential to improve upland use and distribution on individual allotments. The WDA correctly identifies additional mitigation measures and the importance of such work on the long-term economic and social health of the region. The Draft SEIS also needs to recognize the important role that the conservation district pays by virtue of its statutory jurisdiction and expertise. In the context of monitoring reclamation, both the district and the permittees should be directly involved.</p>	
	6.			<p>Sublette County and Sublette County Conservation District do not agree that a JIO should be adopted, largely because the Jonah JIO entirely ignores local government jurisdiction and the permittees. As noted elsewhere in these comments, Sublette County has important areas of jurisdiction, traffic, roads, social and health services, and law enforcement, all of which are not addressed in the JIO. Similarly, the conservation district has unique expertise and jurisdiction over natural resources and agriculture issues. Both local government agencies should be a member in any coordination group.</p>	
	7.			<p>Sublette County and Sublette County Conservation District support the WDA discussion regarding mitigation measures and the comments on compensatory mitigation.</p>	

GR-4

LA-7-5

GR-5

LA-7-6

G-1

G-2
LA-7-7

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	8.			<p>Dust Control The amount of fugitive dust is of great concern to Sublette County. Air quality and visibility is a marketable asset of the area and is associated with local lifestyles and a selling point in the tourism industry. The provision in Travel Plan, Proponent Committed Measures, falls short of addressing the problem. It is the County's position that roads that service more than three wells have dust control provided on a regular basis and those roads that service more than fifty wells should be paved.</p>	
	9.	App. F Table 1		<p>Comparison of impacts of all Alternatives incorrectly reports the impacts on Local Demands. Here and throughout the document analysis the Draft SEIS states that local demands are being met. This statement and the underlying assumptions are incorrect. The County is struggling to meet the demands for such services and is falling short of its ability to meet such demands. Drug abuse, domestic abuse, and other crimes are at an all time high and continue to increase. Discussions with law enforcement officials and the County Attorney will verify this fact. Schools have not been able to meet the need for bilingual teachers and additional pits had to be constructed at a sewage disposal facility to handle waste hauled in from area gas fields. Analysis of impacts on local demands needs to be corrected throughout the document and the Draft SEIS needs to further identify actions that might reduce these adverse effects.</p>	
	10.	Table 1		<p>Impacts to Road Maintenance. Here and in Chapter 4 the impacts to County and municipal roads and streets must be reported. The significant increase in traffic wears down existing roads, increases county maintenance obligations, and increases erosion issues as well. The traffic also generates more trash along the roads, which in turn requires additional clean up efforts.</p>	

T-2
LA-7-8

SE-1
LA-7-9

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	11.	4-16	4.3.2	In section 4.3.2 at the top of Page 4-16 it is reported that demand for motel rooms year-round exceed supply from 1999 to 2006. The impacts on tourism and recreation for the lack of available motel or campground facilities must be reported. There is insufficient housing for workers and they displace tourists in existing motels and campgrounds. This in turn adversely affects the tourism sector of the local economy.	
<u>SPECIFIC COMMENTS</u>					
	12.	2-29	2.4.2.4	The SEIS fails to explain the rationale for Alternative C. At the project level, the alternative should be focused on resolving issues identified in scoping with respect to the proposed action. Alternative C does not do this. Instead, Alternative C is based on how BLM geologists would develop the field; this is not the criteria for developing alternatives.	

SE-2

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AL-1

LA-7-12

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	13.	2-30	2 nd ¶		On p 2-30 2 nd ¶ it is acknowledged that the Operators defined the proposed core area based on the success of development to date and projected success in the future. However, BLM would reduce the core area. The RMG projection for development is based on their proprietary knowledge of area geology not information derived from knowledge gained from considerable drilling experience in the area. As there is no analysis offered as to why the core area was changed the decision appears to be arbitrary. Alt. C is not responsive to the proponent's need and right to develop their leases.
	14.				Of equal concern is the restriction of seasonal restriction for delineation wells outside the core area. Exception modifications and waivers should be allowed based on the nature of the disturbance its location, absence of species of concern and ability to mitigate impacts.

— AL-2 —
— LA-7-13 —
— PA-3 —
— LA-7-14 —

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	15.	2-33	1 st , 2 nd bullet last ¶ 3 rd bullet next page	Comment applies wherever it occurs in this section.	Here the Draft SEIS prevents development and surface disturbance in DAs that have been fully developed. This text should be struck or rewritten to allow for maintenance or retrofit of production facilities or improvements that could lessen or mitigate impacts. Unless economically or technically infeasible seasonal closures would apply.
	16.	2-36	DA-5 last ¶		The Draft SEIS fails to analyze and disclose the need to retain the seasonal closures in this area for sage grouse or to look at possible alternatives such as phasing development inside DA-5. Considering the number of leks and habitat in the area, it is difficult to conclude that relaxing the seasonal stipulations in this area would have significant impact on grouse populations.
	17.	4-16	4.3.3.1	The following comments apply to this entire section. Please find enclosed comments provided by the Sublette County Socioeconomic Analyst.	
	18.	4-36			<i>See Ex. 1, Jeffrey Jacquet, Sublette County economist.</i>

PA-4
LA-7-15
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	19.	4-37	4.4.5 App. C	New first bullet. BLM will coordinate closely with the affected counties regarding transportation issues to ensure that county transportation needs are addressed.	Here and in Appendix C the discussions fail to recognize the County's statutory jurisdiction and right of involvement in transportation issues.
	20.	4-127	4.20.3.1	To the end of the 1st paragraph add: The role of drought and predator population increases is not quantified but also plays an important role in sage grouse, deer, antelope and elk populations.	The SEIS needs to acknowledge the significant role that drought and predators play. Drought is a recognized factor in sage grouse and other game animal numbers. Predator populations continue to rise, which means larger wildlife losses. The failure to disclose and analyze role of predators suggests incorrectly that any population changes are solely due to development.
	21.	C-8	Purpose	To first paragraph add: This transportation plan applies only to BLM administered roads. Applying it to county roads will require coordination with the appropriate county.	Some of the measures proposed here could be construed to apply to county roads over which BLM has no authority.

T-4
 LA-7-17
 W-1
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 T-5

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	22.	C-10	18.	In consultation with BLM, WG&FD, County, Conservation District and affected permittees , Proponents will install gates as appropriate and supply other needed material in crucial winter range and sage grouse concentration areas to encourage compliance with traffic restrictions.	The permittee and County should have input on any issue that affects their access or other rights or responsibilities.
	23.	C-30			The definition of the term “active nest” should be added to glossary to prevent misinterpretation of the meaning.
	24.	C-34	2 nd & 3 rd bullet under Compensation for impacts		These paragraphs must be rewritten to comply with IM2005-069. The proposals here meet the definition of compensatory mitigation in the IM. On Page 3, first bullet of the IM lists three steps for NEPA analysis. They have not been accomplished here.

T-6

LA-7-20

W-3

LA-7-21

G-3

LA-7-22

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	25.	Compensation Impacts (contd.) 3 rd bullet			At the 3 rd bullet it provides that off-site action will be implemented if of significantly more value than on-site actions. This proposal circumvents the limitations placed on off-site mitigation on Page-5 of the IM, 1 st paragraph, 2 nd sentence under <u>Limitations</u> . It states, "The BLM will mitigate onsite impacts to the maximum extent possible". On Page-4 of the IM it clearly states, "However it is not BLM policy to waive or forgo onsite mitigation of impacts through the payment of monies". In effect this is what is proposed here.
	26.	C-34	4 th bullet	Replace with: To assure implementation and use of effective monitoring efforts and mitigation options, annual mitigation planning for wildlife and habitats will be coordinated among the BLM Sublette County, the Sublette County Conservation District, WG&FD, other Cooperators and the Proponents. Through this group the BLM will seek improvements to further reduce impacts from the Project. Financial support for this group's activity will be provided by the project Proponents.	This constitutes a group of affected interests and authorities within the Project area. Mitigation should extend to livestock grazing permittees and affected communities.

LA-7-22

LA-7-23

GR-6

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	27.		5 th bullet	Strike this paragraph.	The activities proposed here can be accomplished by the group above. The County and Conservation District are on record as opposing any entity that in effect replaces the BLM in management of their resources and does not include local government. It would also violate the legal doctrine that prohibits BLM from delegating its statutory authority, except in specific cases and in compliance with Administrative Procedure Act.
Ron Dutton, Economic Consultant to the Coalition of Local Governments					

G-4

LA-24

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Commenter Name	Comment No.	Page	Section	Comment & Discussion:	
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	28	3-9	Table 3.5-3	The employment and earning estimates for the resource development phase must be recalculated and revised.	This is the first instance of what appears to be a consistent error throughout the socioeconomics section. The estimates of employment and earnings reflect a stated assumption of 47.4 workers per well, at an average earnings of \$49,372. Those assumptions in turn appear to be based on values developed either for the Jonah Infill project or by the Sublette County Community Partnership and Sublette County (<i>A Brief History of Drilling in Sublette County, 1995 – 2005.</i>) However, the estimates presented in the SEIS presume the direct jobs last the entire year, rather than for the duration of the drilling and completion (about 35 days). As a result the development jobs, earnings and related effects are overstated by a factor of about 8. This is a significant error resulting in a major misrepresentation of both the effects during development, as well the economic contraction that would occur post-development, e.g., see the discussion on 4-24 and 4-25.

LA-7-25

SE-3

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Commenter Name	Comment No.	Page	Section	Comment & Discussion:	
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	29	3-10	Populati on, 2 nd pp.	Revise the discussion of second homes.	As presented the discussion is inconsistent with Census Bureau definitions. The data presented represents the share of homes for seasonal, recreational or temporary use. These may be second homes, but may also include traditional housing for seasonal or migrant workers, hunting cabins, and mobile homes and RVs.
	30	3-14	3.5.4 3 rd pp	This paragraph and table 3.5-12 need to be revised. It is misleading.	The narrative states that “There was no mining activity other than oil and gas reported for Sublette County.” In fact, under the Mining category, the data source cited identifies support activities for mining, as well as mining except oil and gas. The monetary value of earnings is not reported for the latter category, due to disclosure restrictions. However, that is not the same as “no activity”. Similarly the text reports that the fastest growth in earnings occurred in “Agriculture” (242.7 percent). This might lead a reader to believe that there had been a major change in the local industry, when in fact the change reflects changes in market conditions and prices.

SE-4

LA-7-26

SE-5

LA-7-27

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	31	3-14	3.5.4 4 th pp	Revise the first sentence.	As written, this sentence leaves the reader with the impression that Sweetwater County, as a unit of local government, limits the disclosure of the industry earnings. In fact, the County has nothing to do with that decision, which is in fact a reflection of federal and state government protocols regarding the collection and disclosure of information on establishments, payroll and employment.
	32	3-16	Table 3.5-12	Total Employment in Sublette County 2004 should be corrected to 5,204.	Typographical or data entry.
	33	3-16 & 3-17	Last pp and Table 3.5-13	Clarify the text and change the title to the table.	This discussion refers to a different concept of employment and different data series than that which immediately precedes it.
	34	3-23	3.5.6.7	Revise the text to describe the functioning of the Wyoming School Facilities Commission with respect to school capacity, construction and closure.	Local school districts do not exercise sole decision-making authority with respect to school facilities. Rather, decisions regarding school capacity are subject to some review and approval by the Wyoming School Facilities Commission.

SE-6
LA-7-28
SE-7
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SE-8
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	35	3-24 to 3-26	3.5.7	<p>Revise the narrative to correct factual errors and more clearly portray local fiscal conditions and the contributions of energy development to those conditions.</p> <p>For example, the text reads that Lincoln County levies a 5 percent sales tax. That is incorrect. The state imposes a 4 percent sales tax and the county imposes a 1 percent sales tax.</p> <p>The second paragraph states that assessed valuation is the basis for the mineral severance tax. By statute, the basis for imposing the severance tax is the "value of gross product" per W.S. 39-14-203.</p> <p>The second paragraph also states that "County revenues from mineral severance taxes and property taxes...are paid to Sublette County and its municipalities." Sublette County does not collect or distribute severance taxes; the State of Wyoming is responsible for collection and distribution.</p>	

SE-10

LA-7-32

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	36	3-25	1 st full pp	Clarify that severance and federal mineral royalties play a very minor role in Sublette County finances.	The allocation formulas for severance and federal mineral royalties limits the amount of revenues returned to local governments in Wyoming. In 2006, the distributions of federal mineral royalty and severance taxes to cities, towns and counties in Wyoming totaled \$58 million, less than 3 percent of the 2.07 billion in total revenues collected by the state. Moreover, the revenues to local governments were distributed statewide, with no defined allocations to units of local government most affected by energy development.
	37	3-25 and 3-26	Text and Table 3.5-20	Revise the text and table to reflect that the severance taxes described are based on production occurring from development in Sublette County. However the tax distributions do not accrue to Sublette County.	
	38	3-25	Last pp.	Correct the statement that 50 percent of the FMR are returned to the state.	Fifty percent of the FRM, net of an administration fee (approximately 1.0 percent) are returned to the state. This is not a major difference, but as presented the text is factually incorrect.

SE-11

SE-12

SE-13

LA-7-33

LA-7-34

LA-7-35

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	39	4-17	Economic Benefits	Revise and correct the estimates of employment and wages and salaries.	<p>As indicated above, the estimates of employment, wages and salaries and related factors is based on an incorrect application of assumptions regarding the direct development employment.</p> <p>As presented the projections are off by a magnitude of approximately 8.</p>
	40	4-20	Table 4.3-4	Add a table showing the allocation formulas for severance taxes, including the caps on distributions to towns, cities and counties.	
	41	4-20	Table 4.3-4	Revise to correctly portray the allocation of Federal Mineral Royalties under Wyoming statutes.	<p>The table as presented is correct, to an extent. The percentages shown do apply, however, the total distributions under that formula are capped at \$200 million per year. Revenues in excess of the cap are allocated to the state's budget reserve and the school foundation program. Last year the total revenues were \$1.07 billion.</p>

SE-14

SE-15

SE-16

LA-7-36

LA-7-37

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	42	4-20 and 4-21	Last pp	<p>Revise to describe the role of recapture provisions related to education funding and ad valorem taxation.</p> <p>The statement following Table 4.3-5 is incorrect as it ignores the recapture provisions.</p>	<p>The total ad valorem taxes collected in Sublette County included significant sums that supported statewide education funding; not only the proceeds from the statewide 12 mills shown in Table 4.3-5, but also \$40 million +/- under the so-called recapture provisions that affected those districts with high valuations.</p>
	43	4-23 to 4-29	All	<p>The assumptions regarding tax revenues generated should be footnoted "Based on 2005 gas prices and tax rates."</p> <p>A footnote should also be included indicating that the ad valorem taxes include amounts that would leave the county to support the school foundation program.</p>	
	44	4-23 to 4-29	All	<p>The present values of the earnings streams should be recalculated.</p>	
	45	4-23 to 4-29	All	<p>The discussions of post-development economic contractions need to be revised to reflect the revised employment projections.</p>	
	46	4-23 to 4-29	All	<p>The projections of the FMR to Wyoming should be revised to reflect the administrative fees.</p>	

SE-17
SE-18
SE-19
SE-20
SE-21
SE-22
SE-23

LA-7-39
LA-7-40
LS-7-41
LA-7-42
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	47	4-23 to 4-29	All	The projections of FMR to Wyoming and severance taxes should be disaggregated to show the total distributions to cities, towns and counties, as compared to those retained by the state, assuming that the statewide caps are met each year.	

SE-24

LA-7-44

My comments to Local Government regarding the PAPA DSEIS
By Jeffrey Jacquet

Dear County Commissioners,

I believe that we all have been disappointed by BLM's actions towards socioeconomic analysis and mitigation in Sublette County. For what it is worth, I do think the new PAPA DSEIS is far better in terms of socioeconomic analysis than the original PAPA document or the Jonah Infill FEIS.

However, I think there are a number of areas in the PAPA DSEIS where BLM – quite frankly – owes the local Sublette County government and municipalities better analysis and better explanations.

It might be a long shot, but I feel that forcing the BLM to answer to the following points may actually improve the socioeconomic analysis done by the BLM in the future and create better responsiveness by BLM in this area. The information they provide might also help us make better decisions going forward.

I hope you will consider incorporating the following points into your comment submittals to BLM. It might even be beneficial to tell them you cannot make an informed recommendation until these points are answered.

Thanks,
Jeffrey Jacquet

1. The DSEIS does not discuss the “costs” to local governments associated with population growth or PAPA-related industrial activity. As we all know, all of the local governments are facing huge capital expenditures related to both temporary and permanent population growth associated with the gas fields. Sublette County, in particular, has a number of huge capital expenditures on the table, (from new maintenance buildings, library expansions, possible recreation centers, new health care clinics, etc) along with increased annual budgetary considerations for road and bridge, law enforcement, etc. The town is facing a number of huge subdivision proposals related to the gas field that will undoubtedly increase municipal budgets, not to mention sewer and water infrastructure projects.

SE-25
LA-7-45
There is no attempt to quantify these costs in the DEIS. Not only does the BLM need to estimate in a reasonably detailed way for each alternative such costs to the communities in order to provide an honest impact assessment, but the local municipalities need to see a “Revenues minus Costs” schematic in the PAPA DEIS in order to formulate an informed opinion.

2. The DSEIS does not discuss the negative impacts of increased employment opportunities on the already strained local workforce. Obviously, increased employment opportunities will have a number of positive impacts (many of which are noted in the DSEIS). However, this will likely be balanced with a number of negative impacts that are not discussed.

With one of the lowest unemployment rates in the nation, Sublette County currently faces severe workforce shortages, and - as we all know – local businesses and government are struggling to find workers. Increased employment opportunities in the gas-related industries will likely create even bigger workforce strains on non-gas-related businesses and will probably threaten economic stability as the non-gas field sectors continue to struggle. As I have noted previously, a number of economic sectors in Sublette County (such as Entertainment, Food Service, Day Care, etc) have actually lost the number of employers and employees in the last five years, despite a population increase of about 17%.

SE-26
LA-7-46
The DEIS must disclose how increased job creation related to PAPA development will impact the current context of full employment and workforce shortages and how each of the different alternatives will affect these impacts. A sweeping assessment that merely states, “more is better” regarding increased employment is utterly inadequate when faced with an existing context of full employment.

3. Related to this point, the DEIS does not discuss the negative impacts of a nonlocal workforce. The DEIS treats non-local workers as creating “direct, indirect, and induced contributions to economic activity” (Section 4.3.3.1) but does not discuss the negative impacts of a non-local workforce, other than the increased demand on rental housing/motel room supply. The DEIS more-or-less says that non-local workers will have little-to-no impact on the local economy.

SE-27
LA-7-47
However, non-local workers exert demand on local government and private sector services but don’t bring with them the additional workers to provide these services. Workers who relocate here and bring their families provide spouses and children that can enter the workforce and help provide these services. Non-local workers do not. The DSEIS must disclose the negative impacts of a non-local workforce, along with the positive impacts.

SE-28
LA-7-48
4. The “Boom and Bust Characteristics” need to be expanded. Under the headline “Boom and Bust Characteristics” on page 4-17, the DEIS states:

Because drilling extends for a longer period under the Proposed Action Alternative and Alternative C than under the No Action Alternative, total earnings from oil and gas production would drop more sharply and sooner under the No Action Alternative. Furthermore, total nominal earnings in each year are greater under the Proposed Action Alternative and Alternative C than under the No Action Alternative.

In the strict terms of “earnings from oil and gas production”, I would agree that the preferred alternative of 4,000-some new wells will indeed make the “bust” more gradual and drawn out when compared to the No Action alternative. I say this because the Jonah Field will near completion around 2012 or so and the 4000 additional wells will ensure a gradual “let-down” when compared to a scenario of both fields reaching completion at the same time. However, when you factor Sublette County’s economy becoming more and more dependent on natural gas extraction over this extra decade of development, it is possible that the overall economic “bust” may be increased as gas field development related economic sectors become more and more entrenched in the economy and non-gas field business continue to struggle over this extra decade. Either way, the effects on the overall stability of the economy in the context of an extra decade of gas-field economic dependence needs to be expanded.

5. The DSEIS Population Estimates are inadequate and contradictory The DSEIS offers population growth estimates on Table 3.5-6, but then in Table 1 of Appendix F states that all of the alternatives will not affect this population growth estimate. According to this table, the proposed alternative of adding over 4,000 wells over an entire decade of development will not affect the population growth in any way.

Yet, on page V of the Executive Summary the DSEIS states: 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? Population increases from PAPA development, or not?

The idea of no population impacts is very hard to believe, especially for the adjacent relatively rural areas in Sublette Co, and especially when considering the recent population growth that is widely seen as an effect of natural gas development.

The DSEIS must eliminate this contradiction. If PAPA development will not affect the population, then the DSEIS needs to provide a detailed justification as to why this is so. More realistically, the DSEIS needs to explain how the different alternatives will each affect the population estimates.