



United States Department of the Interior  
NATIONAL PARK SERVICE

GRAND TETON NATIONAL PARK  
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MOOSE, WYOMING 83012

L7619 (GRTE)

Feb 8, 2008

Memorandum

To: Caleb Hiner, Project Lead, Bureau of Land Management, Pinedale Field Office

From: Superintendent, Grand Teton National Park

Re: Comments on the Revised Draft Supplemental EIS for the Pinedale Anticline Project Area

Grand Teton National Park (GTNP) would like to submit the following comments on the Revised Draft Supplemental Environmental Impact Statement (SEIS) for the proposed long-term development of the natural gas resource in the Pinedale Anticline Project Area (PAPA). These comments supplement our March 1, 2007, comments submitted on the original SEIS published in early 2007.

**Wildlife Comments**

In our March 1, 2007 comments, we expressed our concern for the long-term well being of migratory mule deer and pronghorn herds in relation to ongoing energy development on the Pinedale Anticline. After review of this Revised Draft SEIS, we continue to express the same concern. In particular, we are concerned that the small numbers of these species that winter in and adjacent to the project area and migrate to summer ranges in and near GTNP remain able to do so in the future. Their ability to do this will depend in part on their continued access to secure winter ranges in the project area and maintenance of adequate numbers of animals in these migratory segments. Although the preferred alternative outlined in the Revised Draft SEIS does take steps to address some of the issues we raised, we remain concerned that the development as outlined could exacerbate the impacts and declines already observed in mule

deer and pronghorn and their habitats (Sawyer et al. 2005, 2006a, 2006b, Berger et al. 2006, 2007).

The enclosed map depicts winter locations of 10 adult female pronghorn that were captured on summer range in GTNP in 2003. The majority of these animals (8 of 10 pronghorn) wintered within the PAPA. More than half of the 2,384 winter locations fell within crucial winter ranges delineated by the Wyoming Game and Fish Department. These crucial winter ranges appear to be important to this GTNP segment of the Sublette herd as do other areas within the core development area and PDA. Berger et al. (2007) reported that pronghorn do not use the PAPA uniformly and rely disproportionately on habitat within the core development area. To date, much of the existing development in the PAPA has occurred along the northern and southern portions of the Anticline. In the more intensely developed Jonah field, Berger et al. (2007) found that some pronghorn appear to avoid areas of intense development. As development intensifies and encroaches on crucial wintering areas in the PAPA, we are concerned that additional impacts could initiate further declines that could lead to the eventual loss of pronghorn or mule deer from GTNP and the surrounding area. Securing the future of these migratory populations will become more difficult as development and development pressures intensify.

The number of pronghorn that make seasonal movements between areas south of Pinedale and GTNP and the Gros Ventre River drainage is not known with certainty. Based on recent monitoring surveys we estimate that this segment is comprised of perhaps 200 to 400 individuals (GTNP unpublished data), with a smaller subset summering within GTNP. The small size of this population segment makes it vulnerable to loss. With ongoing and intensifying impacts to crucial winter ranges the risk of local extirpation may be increased. To ensure that the GTNP/Gros Ventre summer segment of the Sublette herd persists and better understand the potential impacts to this segment, we suggest that research and monitoring efforts have a component that focuses specifically on a sample of these animals. We also recommend that quantifiable impact thresholds and appropriate mitigation responses for pronghorn in the GTNP/Gros Ventre summer segment be developed and added to the wildlife monitoring and mitigation matrix. This would allow an appropriate change in management in a timely way, should impacts occur, and better ensure the long-term persistence of this segment.

We are supportive of many of the components outlined in the preferred alternative of the revised EIS (e.g., directional drilling, access management, clustering of infrastructure, and liquid gathering systems, etc.). The development of a wildlife and habitat mitigation plan, wildlife monitoring matrix and a compensatory mitigation fund also mark positive steps in the process. However, in light of documented impacts to mule deer and pronghorn populations and habitats from past and ongoing energy development and given the uncertainty surrounding the magnitude of future impacts the current elements of Alternative D appear short of ensuring the long-term conservation of migratory mule deer and pronghorn. We suggest giving strong consideration to leaving in seasonal timing stipulations in crucial winter ranges within the core development area and PDA and eliminating the PDA. The elements could be incorporated into Alternative D.

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We thank you for this opportunity to comment on the Revised Draft SEIS. Should you have any questions related to our comments or this memo, please contact Jennifer Carpenter, Park Planner, Grand Teton National Park, at 307-739-3465.

*/s/*

Mary Gibson Scott

cc:

Jennifer Carpenter, NPS-GRTE

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Enclosure

**Literature Cited:**

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Sawyer, H., R. Neilson, D. Strickland, and L. McDonald. 2005. 2005 Annual Report: Sublette Mule Deer Study (Phase II): long-term monitoring plan to assess potential impacts of energy development on mule deer in the Pinedale Anticline Project Area. Western Ecosystems Technology, Inc. Cheyenne, Wyoming.

Sawyer, H., R. Nielson, F. Lindzey, and L. McDonald. 2006a. Winter habitat selection of mule deer before and during development of a natural gas field. *Journal of Wildlife Management* 70:396-403.

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