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cc
bcc

Subject Pinedale SEIS

Dear Pinedale BLM and those administering the SEIS:

I would like to add my comments and hope you will consider them when making your final decisions.

First of all, I support Alternative D, the proposal put forth by the producers.

I have grave concerns with the process and quality of data the Pinedale BLM office is using to make decisions. Moreover, I believe you have internal biologists who have private agendas against any development and which are contrary to NEPA, good government and making quality decisions.

W-1
I-21-1

Deer: I believe deer populations are most affected by three factors: (1) food (usually found in reclaimed and treated lands), (2) absence of predators and (3) the limiting factor of winter habitat. I find it particularly hard to understand how the deer herds are over impacted by oil and gas operations when I have deer using my back and front yards (in a Pinedale-like setting) with cars going by at a rate of one every 2-4 minutes. In Utah, for instance, trophy production has gone from last in the Rockies for trophy big game in the 1990's to now being first in the Rockies by emphasizing these three factors. One of the biggest deer harvested in Utah last year came from a reclaimed phosphate mine because of the replanted crested wheat grass and other forbs. Utah now produces more trophy animals than all other Rocky's states combined. Why? They understand the impact of predators. I'm not sure you are aware but the state-wide Utah Governor's deer and elk permits recently sold for \$187,500 and \$145,000 respectively (and the money will go back into herd and habitat development). The conclusion to be reached on deer on the Mesa is that your focus should be on the real factors of food, absence of predators and winter habitat that influence a healthy herd.

TE-1
I-21-2

Sage Grouse: Brigham Young University recently completed a study that concluded that predators have more impact on Sage Grouse than any other factor, including man. Please talk to the third-generation Pinedale ranchers who have continually given your office and the PAWG information and opinions that the current decline in Sage Grouse is cyclical and more a factor of the current drought. Sage Grouse chicks need the abundance of seeds and bugs that come from new- and mid-growth sage brush than they do from old-growth Sage Brush that principally supplies cover. Look at the Deseret Land & Livestock Ranch in Utah where predator control and land rehabilitation have resulted in a 600% increase in Sage Grouse. Why can private owners like the Vermillion Ranch in Wyoming do something to improve Sage Grouse but lands administered by your office have Sage Grouse in a steep decline?

M-1
I-21-3

Intervention: You have only allowed real intervention and mitigation on off-site areas such as State Lands. I think you are promoting a self-fulfilling result when you don't permit applications that result in meaningful intervention on the Mesa. From my perspective, your inhouse biologists are in a 'paralysis by analysis' and 'let's study them till they're gone' mentality.

G-1
I-21-4

Timing: The only conclusion I can reach is that there is a private agenda when you extended the comment period because some environmentalists claimed the public hearing was too full and they were intimidated. Ask yourselves if you would have extended the comment period if employees of the producers were equally 'intimidated?' Quit playing games, manage the land for multiple use and sustained yield. You are doing more damage to the flora and fauna by your delays than you are by action.

- G-2 - I-21-5
Success: The way I see things, you should be following NEPA and measuring success in a different way -- by results. If you would interpret NEPA as intended, you would redefine success as having made EIS and SEIS decisions that resulted in *more water, more habitat treated and restored, more AUMs, more hunting permits, more trophy big game, better air quality, fewer listed species and more approved APDs.*

TE-3 I-21-6
Buffer zones: Your data is too fragmentary to conclude such large buffer zones around raptors and Sage Grouse. Please make sure your data is conclusively complete and peer reviewed.

- SE-1 - I-21-7
Socio-Economics: NEPA requires that you include Socio-Economic factors in your final SEIS decision. You don't have anyone in the Pinedale office and no credentialed economists in the state BLM office that could do this work. You are leaving out the human factor in your final decisions. Can you imagine the uproar if you had no biologists or range experts on your staff and made a final NEPA decision on the Mesa? If you did that analysis, you would come to the conclusions like the University of Utah did on its study of the Uintah Basin -- that 60% of all direct, indirect and apportioned wages start with the oil and gas industry. You would also have to consider that we are in an national energy crisis and the natural gas reserves in the Mesa are needed now! You would note how southwestern Wyoming enjoys some of the lowest utility natural-gas rates in the nation. You would note what the oil and gas industry provides to Wyoming's governmental surplus and how its teachers are paid more from these funds. I believe you are derilict to do such a comparatively poor job on Socio-Economics as compared to other wildlife factors.

I've watched the Pinedale BLM office for a long time because of my friends in town and believe you have been doing a good job on your past NEPA decisions. Whether I agree with your decisions, I felt they were even-handed and you made choices without the need for adult supervision. You put together the PAWG, included comments and data from diverse parties and came to the right decisions for the environment and for the community to allow year-round drilling on the Mesa. I have since watched new people transfer into your office who have private agendas that are anti-development. It's time for the Pinedale Supervisor to overrule the inhouse biologists who are looking at the Mesa with blinders on. The data is clear, studies are published, results are obtainable and drilling and wildlife can coexist and thrive on the Mesa.

This is what the producers are proposing in Alternative D and it should be approved by your office.

Thanks,

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