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Dear Sirs:

- I am again disappointed with the PAPA DSEIS. My comments of last April remain largely unaddressed, and so I am appending them again for your full re-consideration. Below are further comments intended to clarify and amplify my previous suggestions regarding the Socioeconomic section.

SE-1 I-7-2 **The revised DSEIS does not clearly capture and present the socioeconomic environment into which the proposed action would be inserted.**

- SE-2 I-7-3 To be realistic, the affected environment description which comprises this Chapter must include future projections accounting for (non-PAPA) recent commitments and reasonably foreseeable events such as Jonah, Wamsutter, PXP, etc.

- SE-3 I-7-4 To disclose the critical impacts of boom, all projections should be extended to five years after the anticipated bust trough (ca. 2030). To stop the socioeconomic projections along their steady climb is misleading at best.

- SE-4 I-7-5 To be comprehensible the section should be organized by affected jurisdiction / entity. Just as addressing mule deer impacts by herd unit is appropriate, local government jurisdictions (and entities such as publicly-subsidized substance-abuse and mental health counseling services) should form the baseline analytical units for this section.

- To be meaningful to the affected jurisdictions / entities, the baseline projections should include both revenue projections and workload/demand projections, preferably on the same readily-graspable graph.

- SE-5 I-7-6 In other words, **in each of the Affected Environment socioeconomic subheadings** (population, law enforcement, schools, fire protection, infrastructure) **include an incidence and revenue graph reflecting actual or anticipated changes between roughly 1995 and 2030**, For example, each school district should be able to plainly see their projected baseline (non-PAPA) revenue in 3-5 year increments through the year 2030, and also see the projected enrollments.

SE-6 | I-7-7 | **The revised DSEIS does not meaningfully present socioeconomic impacts of the various alternatives.** Again, the disclosure, analysis and discussion of effects (supposedly the meat of a NEPA document) is far too generalized to be “rigorous” (40 CFR 1502.14[a]).

SE-7 | I-7-8 | To clarify the Environmental Consequences section, **please present comparative projections for each of the datasets examined** in the Affected Environment. For example, the population graph for Sublette County would show the historical data and then continue on to sprout 4 extension lines, one for the baseline projection (from Chapter 3) plus one for alternative A, one for BCD and one for E. The population graph for Pinedale would show historical data and then sprout its 4 extension lines. The revenue graph for Sublette County School District #9 would show the historical data and then sprout its projections. And so forth. Again, projections should be extended to at least five years after the anticipated bust trough.

SE-8 | I-7-9 | **The DSEIS does not develop alternatives to manipulate boom (come-and-go) growth, nor does it rigorously explore and describe means to mitigate adverse socioeconomic impacts.**

- “.....agencies shall: (a) Rigorously explore and objectively evaluate all reasonable alternatives (c) Include reasonable alternatives not within the jurisdiction of the lead agency.” **(40 CFR 1502.14).**
- “All relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies, and thus would not be committed as part of the RODs of these agencies. Sections 1502.16(h), 1505.2(c). This will serve to [46 FR 18032] alert agencies or officials who can implement these extra measures, and will encourage them to do so. Because the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation.” **[46 FR 18026.19(b)]**

SE-9 | I-7-10 | To date, resident population projections in BLM documents have been based on the ground-level assumption that market-forces will entirely determine the community growth path. Presumably the projections are then to be used in planning to accommodate impact (as are all the measures at RDSEIS 4.3.4). In other words, alternative scenarios and projections reflecting active growth management have not been considered.

SE-10 | I-7-11 | Please include a model/alternative assuming that operators (and their subcontractors) developed the Anticline as though it were a camp job in Canada -- handling logistics as if the area were not a potential temporary-hometown for the workforce. Without boom-residents (*defined as those who become residents but for the exploration period only*), many socioeconomic impacts can be circumvented (e.g., overbuilding housing and causing an ensuing real estate bust, over-stretching Town budgets to build related infrastructure, overbuilding schools to accommodate boom-kids, over-hiring teachers who will have to be laid off etc.).

SE-11 | I-7-12 | As I indicated in comments to the previous version of the DSEIS, germane means to mitigate adverse socioeconomic effects include 1) operator-provided or -induced employee housing for long term (production) workers, 2) operator-provided or -induced temporary housing (man-camps, RV parks) for all temporary workers (exploration related), 3) operative shift toward high-capital / low labor intensive operations utilizing more water pipelines, injection wells, telemetry, and high-tech rigs. **Please develop and analyze these** (and other steps which could reasonably be taken as operator-committed mitigation measures) as ‘**Alternatives**’, perhaps as sub-alternatives only in the Socioeconomic section under EIS Alternative D.

The tabular Comparison of Impacts for All Alternatives, now at Chapter 2, is still a fine construct, but the socioeconomic portion at Table 2.4-17 still needs major work.

- Expand the table entries to track the above topics (schools, law enforcement etc.). The heading “Local Demands” is far, far, far too general.
- Reflect impact quantity / degree as specifically as possible (if not projected student #s, infrastructure cost \$, then at least a standardized 10% minor, 50% substantial, 100% major change valuation).
- Be consistent in this. Alternative A of the above-referenced table now states that ‘a sharp decline in development workers may adversely affect the housing market in 2012’. And that sounds bad to the reader. However, no parallel evaluation is offered for Alternatives BCD. So that sounds like the better alternative. Yet I suspect an even sharper resident worker decline to occur in 2017 under those alternatives. Word games are not respectable.

Should you be interested, I am happy to constructively discuss further details of the socioeconomic section of this document with you, your staff or contractor.

Sincerely,

Carmel Kail

Carmel Kail

P.S. NEPA implementing regulations require that an EIS include discussions of the “Energy requirements and conservation potential of various alternatives and mitigation measures”, and also of the “Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures”. [Sec. 1502.16 (e) and (f)]. Please provide the required analysis and disclosure.