

APPENDIX A: SUMMARY OF SCOPING COMMENTS BY CATEGORY

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APPENDIX A—SUMMARY OF SCOPING COMMENTS

Introduction

As described in **Section 1.6, Public Participation**, the BLM conducted public scoping for both the Creston/Blue Gap II and the Continental Divide-Creston Natural Gas Development projects. In the fall of 2005, BLM published a Notice of Intent in the *Federal Register* and invited the public to comment on a proposal for more extensive development in the Creston/Blue Gap II natural gas field. A public meeting was held in Rawlins on October 13, 2005. During the scoping period on the Creston/Blue Gap II Project, the BLM received 29 individual comment letters, faxes, and e-mails.

Very soon after the Creston/Blue Gap scoping process had been completed, BLM RFO received a proposal from BP America Production Company (BP), representing themselves and other leaseholders, to further develop lease holdings in the Continental Divide/Wamsutter II natural gas area. The BLM decided to combine this project with the Creston/Blue Gap project into a single EIS and initiated another scoping process for the newly named Continental Divide-Creston EIS. The BLM published a Notice of Intent for this larger Continental Divide-Creston project on March 3, 2006. A public meeting to discuss the project was held in Rawlins on April 6. In addition to the 29 comments received during the original scoping period, 21 comment letters, faxes, and e-mails were received for the combined Continental Divide-Creston Project. Most of the respondents were the same for both projects.

Section 1.6.2, Key Issues and Concerns, describes those issues raised during the course of scoping for both phases of the project that are considered central to the analysis of impacts in this EIS- those issues that have not already been addressed as matters of law or policy, that deal with resources of high value in the project area, and that would be directly affected by the BLM's decision on natural-gas development in the project area. This Appendix includes a more comprehensive listing of the issues that were raised during the process. The Continental Divide-Creston Public Scoping Notice included a list of scoping questions representing preliminary issues identified by the BLM with regard to resources and management issues. These issues, shown below as *BLM Scoping Questions*, include air quality, cultural resources, land use, soils and vegetation, hydrology and water rights, wildlife, visual resources, noise, recreation, transportation, socioeconomic resources, and reclamation.

BLM's scoping questions and a summary of the public comments received are described below, categorized by resource and management issue. In some instances, BLM did not identify scoping questions for a particular issue; thus only comments are listed.

■ PHYSICAL RESOURCES

Soils

BLM Scoping Questions:

- Are there short-term, direct impacts to the soils in the project area?
- Are there long-range, indirect impacts to the soils resources in the project area?
- How much surface area will be disturbed and for how long?
- What provisions for interim reclamation will be made?
- What measures will be taken to minimize erosion and sedimentation once soil and vegetation is removed from disturbed sites?

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Scoping Comments:

- Consider effects of erosion from wind, and to a lesser degree, water
- Consider mitigation measures that can reduce removal of topsoil and vegetation, and other practices that may have significant short-term impacts to soils.
- BLM must protect against soil erosion by identifying and protecting fragile, steep, or highly erosive soils, including biological soil crusts.

Water Resources

BLM Scoping Questions:

- What are the watershed characteristics of the project area?
- What existing conditions of stream banks and streambeds might be affected by the proposal?
- What is the direction and magnitude of groundwater flows in the project area?
- What are the recharge and discharge characteristics of groundwater in the area, including the relationship between ground and surface waters?
- What are the existing qualities of surface and ground water in the project area? How will the project affect surface and ground water qualities?
- How will produced water from coalbed de-watering operations be utilized and/or disposed of?
- What measures will be taken to minimize erosion and sedimentation once soil and vegetation is removed from disturbed sites?

Scoping Comments:

- Consider effects to water quality in the Colorado River.
- Consider degraded groundwater and surface water.
- Draining all the water from the ground lowers the ground level, provides no water for plants.
- Disclose whether any stream segments exceed water quality standards and/or are listed in the state's Clean Water Act. Determine if any planning and evaluation has been conducted on streams that have been evaluated as impaired, or if there is doubt as to whether any streams are achieving State water-quality standards.
- BLM must insure that waters in the project area comply with state water quality standards and with sections 401 and 404 of the CWA.
- Maintain a buffer zone and NSO around natural springs to protect water quality. Carefully evaluate the appropriate width of buffers and discourage all development or alteration of natural springs.
- BLM must comply with its obligations under the ESA concerning salt and sediment loads to and depletions from Colorado River watersheds.
- Selenium content of produced water must be 2 μ /L to protect fish, waterfowl, shorebirds, and other wildlife. Due to "bioaccumulation" in living tissue, the amount of selenium discharged (not the concentration released) must be monitored and regulated.
 - Do not discharge produced water with selenium concentrations > 2 μ /L into closed containment pits or ponds for disposal by evaporation.

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- Estimate selenium and other trace element concentrations in evaporation ponds using an appropriate model, over a period of years to determine if selenium and other trace elements could post a risk to migratory birds using the pond.
- To prevent migratory bird mortality for species using evaporative ponds:
 - Using an appropriate model, estimate the sodium concentrations in produced water within the evaporation pond over a period of years to determine if sodium could pose a risk to migratory birds landing on the pond. If the model shows that sodium concentrations would exceed 17,000 mg/l, then the pond should be designed with effective wildlife exclusionary devices to prevent access by migratory birds, or other options should be considered for containment and disposal of produced water.
 - If the predictive model does not show an increasing trend in sodium concentrations, the pond should be monitored annually to verify whether levels are increasing over time. If concentrations exceed 17,000 mg/L, netting or other effective wildlife exclusionary devices should be deployed to prevent access, or other options considered for containment and disposal of produced water.
- No surface disposal of produced water should be allowed due to increased salt loading within the Colorado River basin. In addition, it would alter the chemistry, suspended solids, water temperature and/or natural hydrograph of the watershed in the Muddy Creek drainage, which could result in elimination of native fish populations even if the water meets TDS loading set by the Colorado River Basin Salinity Control Forum in 2002.
- Evaluate the use of produced water to irrigate croplands in terms of potential land use changes.
- Analyze management of produced water through re-injection into underground reservoirs through National Pollution Discharge Elimination permits.
- Inject produced water from coalbed methane underground; no surface disposal.
- How are the formations identified for re-injection related to the formations that produce the springs that create the stream in the Muddy Creek drainage?
- Hydrostatic test water released during pipeline construction could alter stream channels, increase sediment loads, and introduce potentially toxic chemicals or invasive species. Avoid discharging hydrostatic test waters directly to streams; release them first into a temporary sediment retention basin if suspended solids concentration is significantly higher than receiving water. Use potable or freshwater well sources for hydrostatic test water.
- At no time should water from a surface source in one basin be discharged into another basin, which could spread nuisance species.
- Regarding pipeline construction and operations:
 - Pipeline crossings of perennial streams should be bored underneath the stream rather than trenching through it, especially Muddy Creek and its primary tributaries.
 - Install pipeline crossings through ephemeral streams by trenching, using riprap to stabilize stream banks. Place riprap from the channel bottom to the top of the high water line on the bank. Use double-ditching techniques to separate the top one-foot of stream-bottom substrate from deeper soil layers, and reconstruct by replacing deeper substrate first.
 - Locate pipelines that parallel drainages outside the 100-year floodplain. Construct pipeline crossings at right angles to all riparian corridors and stream to minimize the area of disturbance.
 - Use the minimum practical width for rights-of-way where pipelines cross riparian areas and streams.

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- Any new road crossing of Muddy Creek proper is opposed; a bridge should be used to span the channel and riparian zone, and the structure should not impact or restrict flow in the channel on the 50-year flood plain.
- For perennial tributaries in the Muddy Creek drainage, design road crossings to allow fish passage at all flows. Preferred structures in descending order: bridge spans with abutments on banks, bridge spans with center support, open-bottom box culverts, and round culverts with the bottom placed no less than one foot below existing stream grade. Perched culverts block fish passage and are unacceptable in any stream that supports a fishery.
- Drilling should not be permitted on slopes exceeding 25%.
- Design drill pad sites to drain storm water and other fluids into a reserve pit with capacity to intercept and hold excess precipitation. Line all reserve pits, irrespective of soil types, with an impermeable barrier to eliminate leaching.
- Staging, refueling, and storage areas should be located away from riparian zones and flood plains. Keep all chemicals, solvents, and fuels at least 500 feet from streams and riparian areas.
- Locate and construct all structures crossing intermittent and perennial streams so they do not decrease channel stability or increase water velocity.
- BLM must protect against degradation of water quality by implementing measures such as lining of reserve pits or pitless drilling.

Climate and Air Quality

BLM Scoping Questions:

- What emission sources and values will be generated by the project?
- How will air quality impacts be evaluated and resources protected during development and operations?

Scoping Comments:

- General concern: long-range protection of visibility.
- The EIS should be consistent with the Rawlins Draft RMP/EIS, which proposed to use a comparative, emissions-based approach.
- BLM must assure full compliance with the Clean Air Act.
- Fully explain and interpret projected impacts, summarizing modeled results and the various methods and assumptions used so that the public can easily understand them for their significance. Include specific mitigation measures, such as improved diesel engine technology and fugitive dust control.
- Estimate potential future changes in emissions. Modeling should address cumulative emissions in the Rawlins Field Office planning area that affect the same areas as C/BGII. Include information in the DEIS regarding cumulative impacts from coal production in the vicinity.
- Address reasonably foreseeable gas and other development in the area, and possible changes in this and other proposed projects. For example, the Jonah Infill gas project suggests that improved diesel engine technology may be necessary for all future gas development projects in Southwestern Wyoming to protect Class I and other air resources.
- Disclose the effects of increases in No_x and other pollutant concentrations, including regional haze, and clarify control measures.

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- The fugitive dust analysis should emphasize the Pm₁₀ standard and percentages of emissions that are fine and coarse particles. Address near-field impacts of fugitive dust, and whether there is potential to approach NAAQS standards.
- Describe potential air impacts of venting and flaring, and whether BLM or the State of Wyoming are considering flare less flow back or similar technology as mitigation.
- Address proposed and needed air monitoring. If BLM intends to add air monitoring stations, describe the program in sufficient detail to ascertain locations and objectives of the monitoring effort.
- The EIS must analyze the cumulative effect on air quality, including all sensitive receptors potentially affected, and acknowledging all reasonably foreseeable emission sources. Additionally, BLM must ensure compliance with all air pollution standards and discuss all mitigation measures available to prevent air quality violations, increment exceedances and adverse impacts to AQRV, including visibility impairment in Class I areas.
- We request that BLM reject use of the Scheffe model for estimation of ozone pollution and use instead an up-to-date photochemical model such as CAMx or CAMQ.

■ BIOLOGICAL RESOURCES

Vegetation and Riparian/Wetland Communities

BLM Scoping Questions:

- Are there short-term, direct impacts to the vegetation resources in the project area?
- Are there long-range, indirect impacts to the vegetation resources in the project area?
- How much surface area will be disturbed; for how long?
- What provisions for interim reclamation will be made?
- How will noxious weed populations be monitored/ controlled?
- What are the revegetation standards and requirements?
- Are there adequate reclamation bonds or other guarantees for reclamation of site disturbance?
- Will there be impacts to jurisdictional wetlands or Waters of the U.S.?
- How much surface area will be disturbed and for how long?
- What provisions for interim reclamation will be made?
- What measures will be taken to minimize erosion and sedimentation once soil and vegetation is removed from disturbed sites?

Scoping Comments:

- BLM should conduct surveys to determine the location and characteristics of native plant communities and rare or special status species and insure compliance with EO 13112 relative to invasive species.
- Outline minimum reclamation standards that emphasize use of native plant species, post-reclamation monitoring, and management.

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- Riparian and wetland habitat buffer zones should preclude new surface-disturbing activities within the 100-year floodplain or within a designated buffer. Recommend buffer zones that include NSO stipulations and clarify if surface occupancy exemption may be granted, including the nature of its mitigation. Clarify if exemptions may be restricted based on the cumulative effects of similar actions in any one riparian area.
- Take measures to avoid wetland losses in accordance with Section 404 of the Clean Water Act.
- Inventory and fully describe wetlands that may be destroyed or degraded in terms of functions and values, and outline specific actions to minimize impacts and compensate for unavoidable impacts.
- Avoid impacts to riparian areas; minimize and assess functions and values in areas of unavoidable impacts, and develop and implement measures to compensate unavoidable losses.

Invasive, Non-native species

BLM Scoping Questions:

- How much surface area will be disturbed and for how long?
- What provisions for interim reclamation will be made?
- How will noxious weed populations be monitored, and controlled?

Scoping Comments:

- Describe the current trend for weed infestations. Include the location of weed infestations within and surrounding the project area, the trend in infestations, specific measures for oil and gas leases, and the annual budget available to affected counties and BLM for invasive species control.
- BLM must provide measures to impede the invasion of noxious weeds.

Terrestrial and Aquatic Wildlife

BLM Scoping Questions:

- What are the current conditions and extents of wildlife habitat in the project area?
- What are the seasonal patterns of wildlife use and movement in the project area?
- Are wildlife populations increasing or decreasing in the project area?

Scoping Comments:

- With regard to wildlife habitat fragmentation, analyze the project at a level that reflects full potential development of the area, rather than on a piecemeal basis to ensure that the consequences of full-field development are clearly understood before wildlife resources are committed.
- Address loss of wildlife habitat and habitat effectiveness, fragmentation, effects to migration corridors, harassment of wildlife by increased traffic, noise, and illegal activities.
- Evaluate where elk will be displaced to, and whether such habitat is suitable and/or herds will be tolerated by private landowners.
- Conduct raptor nest surveys and evaluate impacts to nesting. Establish mitigation such as seasonal timing restrictions, siting of facilities, and installation of artificial nesting platforms away from project disturbances and areas where they could impact Sage-grouse.

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- Evaluate expected cumulative impacts to wildlife habitat and individual populations and herds relative to other energy development occurring in the area, particularly Atlantic Rim.
- Analyze impacts to each of three separate pronghorn herds, both direct and cumulative (instead of a regional or species analysis). Analyze impacts to individual herds of mule deer and elk, as well as three Sage-grouse management areas that overlay the project area.
- Evaluate impacts to mountain plovers.
- Use the lowest road densities possible to minimize habitat loss and disturbance by vehicles.
- Operators should fund necessary wildlife surveys exceeding those normally conducted annually by state and federal biologists.
- The EIS must address the impacts of oil and gas development on wildlife and wildlife habitat function, including:
 - the ecological needs of wildlife on a regional scale;
 - impacts on pocket gophers;
 - impacts on mountain plovers;
 - impacts on prairie dogs.
 - the dispersal or recovery of gray wolves in the southern Red Desert;
- BLM must ensure full compliance with BLM Manual MS-6840.06.E (Special Status Species Management), including attention to ferruginous hawks, other raptors and sage-grouse.
- We urge that BLM protect more than “critical” big game winter ranges.
- We ask that the environmental analysis provide for wildlife diversity by protecting riparian areas and other special habitats, protecting certain species, maintaining connectivity between habitats, maintaining corridors, and assessing indirect and cumulative impacts.
- BLM should adopt the provisions of the WGFD recommendations on sustaining important wildlife habitats affected by oil and gas development.
- The EIS should analyze potential impacts to wildlife habitat, including big-game crucial winter range, sage-grouse, raptors, predators, and big game in general.
- Consider the impact of road building, increased human presence and disturbance, timber harvest, mineral exploration, grazing, etc. on wildlife.
- Protect all species of migratory birds, including Bald eagle.
- The project will be detrimental to the ability to sustain area wildlife.
- Natural gas development is estimated to span 30-50 years in Desolation Flats and Continental Divide/Wamsutter II, and this project will last as long if not longer. Where will wildlife go?
- The northern portion of the project area supports the only viable assemblage of native bluehead suckers, roundtail chubs, and flannelmouth suckers known to still exist in Wyoming. This portion of the stream provides preferred breeding habitat, and movement up or downstream is restricted by the combination of physical barriers and water temperatures. Any cumulative energy development activity that negatively affects the integrity of the watershed and overall stream health may jeopardize their future existence. An NSO restriction is recommended for surface gas development between the Continental Divide north of Muddy Creek proper and the Muddy Creek/Dry Cow Creek hydrographic divide located south of Muddy Creek and upstream of the large wetland complex.

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Special Status Species

BLM Scoping Questions:

- How much surface area will be disturbed and for how long?
- What provisions for interim reclamation will be made?
- Which wildlife species of importance may be impacted by the proposal?
- Will any threatened or endangered species be affected by the proposal?

Scoping Comments:

- The EIS must address the impacts on BLM sensitive plants.
 - Assemble regional habitat-use data from published data where available for T&E species and other key species. Include impacts of road density on local species, distance of road effects to determine the width of effect zones, and species dispersal distances to evaluate the size of core areas.
 - The following T&E Species, or species proposed for listing, may be present in the project area:
 - Bald eagle*** (threatened; found throughout the state). Restrict activities within 1 mile of nests in open country year round. Limited disturbance home range buffer zone may extend outward in potential foraging habitat for 2.5 miles from the nest.
 - Black-footed ferret*** (endangered; prairie dog towns). There may be impacts to two white-tailed prairie dog complexes in the project area where the species is found, and surveys may be recommended if complexes of greater than 200 acres are affected.
 - Blowout penstemon*** (endangered; sand dunes south of Ferris Mtns). Surveys should be conducted in mid-June to early July when flowering occurs.
 - Ute ladies'-tresses*** (threatened; seasonally moist soils & wet meadows below 7,000 feet). Surveys should be conducted.
 - Colorado river fish: Bonytail, Colorado pikeminnow, Humpback chub, and Razorback sucker*** (endangered; downstream riverine habitat, Yampa, Green and Colorado). Formal consultation is required for projects that may lead to depletion of the waters including ponds, lakes, reservoirs, hydrostatic testing of pipelines, wells, dust abatement, diversion structure, and water treatment facilities.
- Include an estimate of the amount and timing of average annual water depletion, both existing and new; describe estimating methods, location of depletion, if and when water will be returned to the system, and what the depletion is being used for.
- Yellow-billed cuckoo*** (candidate). Provide status of the species in and near the project area.
 - Sensitive species***, as identified on the Wyoming Natural Diversity Database.
 - Pygmy Rabbit***. Encourage project planning measures that retain large tracts of suitable habitat and corridors to adjacent habitat.
 - Greater Sage-grouse*** (species of concern).
 - Closely evaluate any activities that result in loss or degradation of sagebrush habitat.
 - Contact Wyoming Game & Fish to identify important habitats, and survey/map important habitats where local information is not available.
 - Evaluate long-term and cumulative effects on the species, since reclamation may not restore populations to pre-activity levels.

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- Unless site-specific information is available, manage habitat following Western Association of Fish and Wildlife Agencies guidelines.

Mountain plover (species of concern). Develop protective measures with an assurance of implementation should they be found in the project area.

- Consider whether potential impacts to listed species on state and private lands will occur as a result of actions on BLM managed lands, and develop measures to avoid or minimize impacts.
- The EIS must address the impacts of oil and gas development on wildlife and wildlife habitat function, including:
 - implementation of a conservation community “blueprint” for Sage-grouse and Sage-grouse habitat throughout the project area;
 - impacts on mountain plovers;
- BLM must analyze how ESA and BLM-sensitive species would be affected by failure to conserve white-tailed prairie dogs, including the impact on black-footed ferret recovery and on BLM-Sensitive and Colorado River Endangered fish species.
- Native fish species in the Muddy Creek drainage are considered sensitive (Status I Species) to both State and Federal agencies. Therefore, habitat function is to be maintained. WGFD’s Strategic Habitat Plan identifies the Muddy Creek watershed as the #2 habitat priority for both aquatic and terrestrial wildlife in most of Southwestern Wyoming.
- BLM must analyze how other ESA and BLM-sensitive species would be affected by the project, including BLM-Sensitive and Colorado River Endangered fish species.
- Baseline studies on pygmy rabbits and impact on this species should be included in the EIS.
- Full-field development will destroy habitat value for sage-grouse leks, hastening their listing under the Endangered Species Act.
- In addition to direct habitat loss for greater Sage-grouse, evaluate secondary disturbance to Sage-grouse in undisturbed habitats adjacent to the project area.
- Evaluate expected impacts and habitat avoidance by Sage-grouse due to structures (particularly powerlines)
- Consider development of artificial leks near existing roadside leks to attract grouse to safer areas.
- Identify and map all existing disturbances of Sage-grouse habitat near the project and evaluate the degree of existing habitat fragmentation, as well as how it would be accelerated by this proposal.

Wild Horses & Burros

A cumulative impact analysis is recommended examining regional effects to the area including South Baggs, Atlantic Rim, Desolation Flats, Pacific Rim, Table Rock, and Vermillion Creek natural gas fields, and the Black Butte Mine. Include the overpopulation of feral horses and nonstandard fences in the analysis of effects on wildlife.

■ HUMAN ENVIRONMENT

Visual Resources

BLM Scoping Questions:

- Will there be visual impacts from the project?
- Can visual impacts be mitigated to conform with the existing landscape and visual quality objectives

Scoping Comments:

- The project will destroy natural vistas and open spaces. BLM should avoid development in areas where the impacts of development would be visible for long periods of time or from long distances
- BLM must protect visual character and scenic resources, including protection from light pollution and impacts to the appearance of the night sky..
- A sensitive landscape that warrants special protection for its visual quality is a “a small portion of the Red Lake Dunes Citizens’ Proposed Wilderness” located in the dune field immediately west of the gravel road leading northward to Hay Reservoir.
- Identify and set aside important scenic and undeveloped areas so that the public has a few unimpaired lands left to visit after this project is underway.
- The North Flattop unit is an area of high importance for visual resources that is not protected under the Great Divide RA RMP, that should be excluded from O&G development. Other such areas are Red Lake Dunes and Cyclone Rim (Class I).
- Protect visual quality in a “5-mile buffer” associated with the Continental Divide Trail (Class I) and with the Cherokee and Overland trails (Class II).
- The EIS should analyze the impacts to scenic quality from effects to visibility and of impacts to the landscape from drilling.

Recreation

BLM Scoping Questions:

- How would the proposal affect recreation in the immediate and general areas?
- Are there opportunities to enhance recreational opportunities in and around the project area as a result of the proposal?

Scoping Comments:

- Evaluate whether increased well densities and roads will further impact recreational use (including hunting). If there is any potential for closing public lands near gas company facilities, address it in the EIS.
- Fragmented/shrinking habitat due to road development could increase grazing competition with wild herds and also decrease hunting success and/or hunter numbers.
- Opposition was expressed to the implied notion of having industry enhance recreational opportunities.

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- BLM should explicitly address “unquantified environmental values” such as the value of the project area and nearby lands for primitive and unconfined recreation and for “simple open space values.”
- Map of recreational resources identifies two areas of “Citizens’ Proposed Wilderness” that potentially affect the project area. These are associated with the Red Lake Dunes WSA and the Adobe Town WSA.

Cultural and Historical Resources

BLM Scoping Questions:

- Will there be impacts on historic and archaeological resources in the project area as a result of development and operations?
- Are there any cultural resources located in the project area that would be eligible for the National Register of Historic Places?

Scoping Comments:

- Conduct thorough archaeological studies and provide mitigation to protect paleontological, historic, prehistoric, or cultural resources in the project area.
- Give specific attention to historic trails in the area.
- Give great consideration to the effects of further authorized development on visitors to historic trail corridors.
- Work with recognized experts to prevent damage to historic trail ruts, considering the economic costs of damage.
- Ensure that there is sufficient inventory of cultural resources in order to avoid resource conflicts.
- BLM must pursue consultation with Native American tribes and protect native sites, and must meet its Section 110 and Section 106 obligations and the requirements that it consult with appropriate Native American groups.

Socioeconomics

BLM Scoping Questions:

- How would populations of Sweetwater and Carbon Counties be affected by the project?
- How much income to Carbon and Sweetwater Counties and the region would be generated by the project?
- How will the project affect the tax base of local government?
- Will there be any impact to local social services, law enforcement, schools or other local community services as a result of the project?
- Will there be an impact on housing costs in Rawlins, Wamsutter, and other Carbon and Sweetwater County communities as a result of the project?
- What will be the impact of the project on the economies of Rawlins, Wamsutter and other Sweetwater and Carbon County communities?

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Scoping Comments:

- BLM must estimate the amount of gas that is both technically and economically recoverable.
- Economically recoverable reserve estimates must include the costs of exploration, development, production, profit, transportation costs, non-market costs, off-site mitigation costs such as increased water treatment costs.
- Please complete a marginal revenue cost analysis of estimated gas production levels. Please compare and contrast the marginal revenues with the marginal costs for the full range of drilling levels.
- Socioeconomic impacts to surrounding communities should be assessed including labor competition, housing demand and government expenditures.
- Request that BLM’s socioeconomic assessment should follow the approaches set out in the scoping briefs “*Socioeconomic Framework for Public Land Management Planning: Indicators for the West’s Economy*” and “*The Economic and Social Impacts of Oil and Gas Development.*”
- BLM should utilize a Total Economic Valuation Framework for evaluating proposed oils and gas development projects.
- The scope of the BLM analysis should extend beyond the surrounding areas.
- BLM must recognize wilderness characteristics and other natural qualities as valuable resources that provide multiple uses for the public.
- Request that BLM fully consider the indirect role of wild lands in attracting non-recreational businesses and retirees.
- A full accounting of all hidden costs of oil and gas drilling is needed. Hidden costs include:
 - changes in direct use of lands within and adjacent to the analysis area,
 - changes in community conditions such as air water and noise pollution,
 - reductions in the value of the area for study of natural ecosystems,
 - off-site environmental effects on other uses of the land,
 - effects on biodiversity, effects on ecosystem services, effects on passive use.
- The BLM should avoid IMPLAN or other input-output models that are grounded in economic base theory when estimating jobs and income for each alternative. We recommend that BLM use the EPS model developed by and available free from the Sonoran Institute.
- The NEPA analysis should be based on reasonable (BLM) budget expectations, which should be clearly stated and the BLM must include a fiscal analysis of alternative implementation and mitigation costs.
- To provide socioeconomic context, the BLM should examine historic trends in county income and employment, using the Sonoran Institute Economic Profile System.
- Request that the agency identify all applicable federal state and local tax laws including exceptions and reductions and make realistic and accurate estimates of net tax revenues from oil and gas production, based on economically recoverable reserves and including the net environmental and community costs from drilling and production.
- Estimate the socioeconomic costs to communities from oil and gas development.
- Increased costs to private landowners and residents.
- Increased costs to local governments.

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- Economic instability and loss of economic diversity.
- Estimate and evaluate the environmental costs of oil and gas development.
- Bonding requirements for industry must be estimated and included in the analysis.
- BLM must include an analysis of the costs of implementing each alternative, including the cost of mitigation measures. These costs must then be contrasted with the anticipated budget levels to assess the probability of mitigation measures being fully implemented. BLM should include a reasonable budget limitation and evaluate a set of management alternatives that are constrained by that budget level.
- The costs of enforcement of environmental protection and mitigation requirements must be estimated and included in the NEPA analysis.
- The project specific and cumulative effects of increased costs and decreased revenues on affected grazing operators should be assessed.
- Recommend that the EIS include a full and thorough social and economic impact analysis including impacts to livestock grazing.
- The EIS should include an assessment of the potential for loss of environmental, historic and social values associated with livestock grazing and the importance of such losses to area residents and visitors.
- BLM must address state and federal as well as local benefits associated with royalty payments and tax revenues derived from natural gas production associated with the CD-C project.
- The benefits of increased supplies of natural gas to the consumer must be analyzed and discussed.
- The EIS should contain a detailed analysis of the socioeconomic impacts and positive effects of the proposed action and alternatives for the State of Wyoming and affected counties and communities.
- The local economy significance criteria should be discussed.
- The EIS should consider potential project effects on local communities including housing, schools, water and wastewater services, increased road traffic with associated dust and hazardous materials spill potential and easier human access to wildlife habitat with associated increased potential for wildlife disturbance. Methods to avoid or mitigate identified impacts should be discussed.
- The assessment should consider the effects of reasonably foreseeable development on area communities.

Transportation

BLM Scoping Questions:

- Will motor vehicle traffic be associated with the proposed operation?
- How will employees, contractors, supplies reach the site?
- Will new roads need to be constructed?
- How will infill development affect existing transportation systems including highways, county roads and project area transportation?
- Can transportation planning reduce and mitigate some of the impacts from further development?

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Scoping Comments:

- Evaluate likely increases in subdivisions, sale of small private tracts, permanent roads, powerlines and fences resulting from this project, and the major negative impacts to all wildlife species in the project area.
- Generate infrastructure scenarios prior to field development, providing multiple road scenarios for potential infrastructure. Include both generous and conservative estimates of infrastructure construction, based on estimates of hydrocarbon resources for the field. Take particular care if unconventional or continuous-type deposits are involved.
- Reduce road density to create blocks of core habitat at a minimum distance from roads (.25 miles for bighorn sheep, pronghorn, and mule deer). Use the Society's landscape fragmentation metrics to guide management decisions regarding transportation routes for other wildlife species, with the goals of reducing road density and edge effects and increasing core areas to provide greater habitat security.
- Establish priorities and best management practices to close and reclaim roads and other routes.
- Create a responsible transportation plan, incorporating detailed guidance from NEPA and FLPMA, specifically:
 - Consider the environmental consequences of the proposed action based on accurate scientific information of high quality [40 CFR 1500.1(b)], and conduct a high-quality analysis of the information collected.
 - Take any action necessary to prevent unnecessary or undue degradation of the lands and minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved. (FLPMA).
 - Following selection of an alternative, continue to monitor the plan, and make appropriate revisions to ensure it is meeting its objectives.
- Use of existing roads and pipeline corridors should be maximized, and extraordinary steps taken where new pipelines or roads cross the trails.
- Use BMPs to locate roads, pipelines, and wells.
- Include the amount of aggregate needed to support anticipated road development in the analysis. The division is concerned about the availability of aggregate from currently permitted operations and the possible need for new sources.

Noise

BLM Scoping Questions:

- How much noise will be associated with the proposed project and what are those noise sources?
- Will sound effects be audible for specific distances from certain points.
- How will topography affect audibility distances?

Scoping Comments:

- The environmental analysis should address issues related to noise in terms of remoteness and quietness.

■ MANAGEMENT ENVIRONMENT

Lands and Realty

BLM Scoping Questions:

- What is the current and planned land use policy for the project area?
- What would be the impact on local land use patterns in the project area?
- How does the “checkerboard” surface ownership created by the Union Pacific Land Grant affect the EIS analysis and possible future gas development?

Rangeland Management

BLM Scoping Questions:

- How much surface area will be disturbed and for how long?
- What provisions for interim reclamation will be made?
- How will noxious weed populations be monitored, and controlled?

Scoping Comments:

- Consider the feasibility of supplemental feeding of livestock on permitted grazing land in areas where road construction will decrease available forage.
- Fragmented/shrinking habitat due to road development could increase grazing competition with wild herds. Consider supplemental feeding of livestock or other mitigation measures if necessary to minimize impacts to rangeland.
- The Federation supports water development projects if the water is of high quality. Produced water could be pumped to stock ponds and reservoirs and new storage reservoirs created.
- Consider impacts to rangeland for wildlife as well as domestic animals.
- The scoping notice did not identify grazing or rangeland management as significant issues, and this is a serious and disrespectful omission.
- Road traffic in the Rawlins FO area has led to livestock deaths and injuries from collisions.
- The introduction and growth of noxious weeds has weakened and killed livestock and crowded out forage.
- The significant increase in road dust has diminished the palatability and nourishment of forage.
- Damaged cattle guards, cut fences, and unlocked gates have raised unnecessarily repair costs and diverted labor to search for lost livestock, some of which were never found.
- Loss of water from artesian and flowing wells has weakened livestock health, reduced weight gain and available forage, induced weeds.
- Reclamation has been poor, resulting in further loss of forage.
- Potential conflicts should be characterized as “probable,” not “possible” as currently written.
- Data from the Fremont County study conducted by the University of Wyoming should be included in the EIS.
- The BLM, grazing permittees, and proponent should work cooperatively throughout the life of the project to make site-specific, case-by-case decisions.

APPENDIX A—SUMMARY OF SCOPING COMMENTS

- Research and monitoring conducted by the operators should include movement of livestock to an open allotment or pasture, purchase of hay in lieu of allotment use, monitoring of development impacts, including use of the Wyoming Rangeland Monitoring Guide of August 2001, construction of water and range improvements on either public or private land, purchase or lease of additional grazing land to replace lands lost to grazing, and reimbursement to producers for loss of AUMs and pastures.
- Analyze the impacts of the loss of open space, scenic vistas and historic rural landscape as related to loss of grazing lands.
- The impact of this project upon food and habitat for domestic animals deserve the same study and documentation as for fish and wildlife.
- Include the positive effects of livestock grazing on the environment and as a tool to achieve environmental objectives, and the impacts of the project on limiting the ability of livestock grazing to achieve positive effects.
- Evaluate how development of additional wells would affect distribution of livestock and feral horses, and effects of changes to grazing on sage-grouse, mountain plover, and big game.
- Address worker housing, the necessity to commute, and the resulting heavy deposition of dust on vegetation and adjacent habitats. Evaluate and mitigate negative effects and loss of AUM's/wildlife forage.

Areas of Critical Environmental Concern

- Give priority to the designation and protection of ACECs for wildlife.
- Designate ACECs in areas of crucial winter range and at pinch points of migration routes, with management prescriptions that include no creation of new routes or expansion of existing routes, no new leasing unless designated NSO, no new energy development, no cross-country travel, limitation of off-road vehicles to designated routes, and closure of unnecessary routes.
- Red Lake Dunes and Chain Lakes proposed ACEC should be withdrawn from drilling

Wilderness

- Wilderness characteristics and other natural qualities must be recognized as a valuable resource.

General and Administrative Issues

- BLM should not approve the project prior to revision of the Rawlins RMP so that the project can be pursued under the framework of an updated RMP.
- The Rawlins Field Office (RFO) is preparing a revision to its RMP that will assess options for preservation of migration corridors and environmentally sensitive areas, including new technologies and other impact-reducing measures. A revised scoping notice for Creston/Blue Gap II removed the requirement that the RMP be complete before a decision is issued for C/BGII; this violates the NEPA process and will delay implementation of RMP decisions, likely allowing more lenient mitigation measures for C/BGII.
- The proponent is bound by stipulations in the Great Divide Resource Management Plan, and in future by the Rawlins Resource Management Plan.

APPENDIX A—SUMMARY OF SCOPING COMMENTS

- The ROD for this EIS will be held up indefinitely because of delays in preparation of the Rawlins RMP FEIS.
- It is unwise to combine the Creston-Blue Gap and Continental Divide projects because one is an infill project in a largely industrial area and the other includes vast stretches of undeveloped lands.
- This proposal is consistent with the Energy Policy Act of 2005.
- Comment indicated concerns regarding multiple-well EAs/EISs.
- Include PacifiCorp in the process to ensure that their rights to site, construct, operate, and maintain their facilities are considered and protected.
- Work cooperatively with Wyoming Game and Fish, local government, and non-government organizations
- Grant the Alliance for Historic Wyoming “interested party” status for Section 106 procedures for this EIS.
- Hold multiple public hearings.
- Judging from the list of issues, concerns, and opportunities issued by BLM to date, we are destroying what makes Wyoming Wyoming.
- Endless pollution from drilling has cost \$70 million in cleanup costs to taxpayers
- No drilling should be allowed on BLM land unless an insurance policy bond is posted for cleanup costs
- The entire American public is skeptical of our energy policy and secret meetings.
- The rate of development in the eastern Red Desert is completely out of control, following on the heels of Atlantic Rim and soon to be followed by Continental Divide.
- Increased gas supplies from this area, as well as Wamsutter, will be necessary within the next two years to ensure that the Kinder-Morgan/Sempra pipeline to Ohio carries Wyoming gas rather than from other states.
- The writers support the project and development of the EIS.

Scoping and Approach

- BLM should define the scope of the environmental analysis to include analysis of the cumulative effects of actions/projects that have impacts in common with those resulting from natural gas development.
- BLM should consider, analyze, and wherever appropriate, facilitate, international efforts to prevent environmental decline.
- BLM cannot define the purpose and need for the project as just to allow natural gas to be developed; it must also include strong environmental protections as at least a co-equal purpose and need.
- BLM must establish the baseline condition or all resources in the area in order to evaluate environmental conditions and impacts in an informed manner.
- Require incorporation of all NEPA policies and goals
- BLM should “infuse” the goals and policies of the National Environmental Policy Act into the environmental review and decision document.

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- Generate landscape metrics for all infrastructure, including density, infrastructure effect zones, and core areas. Metric parameters and evaluation of results should be relevant to ecological conditions, species present, and human use of the landscape. Integrate results into management plans,
- We urge BLM to require that development activities not cause unnecessary or undue degradation.
- Notify all lessees of their responsibility to comply with federal and other applications regardless of land or mineral ownership.
- If BLM, surface owners, and lessees agree, non-BLM lands can be included in section 7 consultation on federal lands.
- Specific management actions like the proposed project must be done pursuant to multiple use and sustained yield principles.
- The environmental analysis and decision document should emphasize resource and ecosystem protection, which will best ensure that future options are retained.
- No new project area disturbance should commence prior to completion of formal consultation under Section 7 of the ESA, preparation of a BA.
- Trade approved APDs for a new APD.
- Provide access to State mineral leases.
- Continue development on fee lands when access across adjoining BLM-administered land has already been approved.
- Permit rights-of-way (pipelines) for previously approved projects.
- Suspend operations on undeveloped federal leases.
- Permit drainage wells for Federal minerals on a case-by-case basis.
- If surface disturbance and other impacts can be shown to be below that analyzed in the EIS, additional wells may be permitted. If reclamation activities can result in reduced surface impacts to a point below that analyzed in the EIS, additional wells may be permitted.
- Set a schedule for completion of the EIS and adhere to it, identifying and explaining the reason for any delays to the National Energy Policy Office.
- Analysis completed for previous projects in this area will provide opportunities to reduce the time and cost required to prepared this EIS. Analysis from other documents should not be duplicated.
- Analyze the impacts associated with the proposed action only.
- Honor the MOU with the Wyoming State Land Office concerning access to state lands and honor private property rights. Make a statement in the EIS addressing BLM's right to restrict access to private lands beyond a customary 30-day right-of-way application period.
- Consult with and use BLM's Reservoir Management Group to assess the requirements to adequately drain natural resources and prevent waste.
- Planned or phased development of the area is not feasible unless one operator controls leases on the entire area because it could create a taking by BLM through restriction of development of a leasehold.
- Consider cumulative impacts of this and other area projects.
- A cumulative impact analysis is recommended examining regional effects to the area including South Baggs, Atlantic Rim, Desolation Flats, Pacific Rim, Table Rock, and Vermillion Creek natural gas fields, and the Black Butte Mine.

APPENDIX A—SUMMARY OF SCOPING COMMENTS

- A landscape-level analysis should consider direct, indirect, and cumulative impacts of this larger combined project.
- Consider adhering to multiple use under FLPMA.
- Use drilling rigs powered by electricity, natural gas, or biodiesel rather than conventional diesel.
- Overall comments focus on harmonious, coordinated resource management that considers the relative values of resources.
- Any development should be slow and should only occur after reclamation of existing disturbances.
- Development in Wamsutter makes it that much more important to protect remaining pristine landscapes like Adobe Town, Jack Morrow Hills, and Wild Cow Creek.
- No drilling should be allowed the eastern Red Desert
- No coalbed methane development due to as-yet unknown long-term consequences
- All support facilities (roads, power lines, pipelines, and well site facilities) should be included in the APD and Sundry Notice permit process.
- New categorical exclusions can only be legally utilized following an analysis of whether extraordinary circumstances (per NEPA, the ESA, NHPA, etc.) may prevent their application.
- The NEPA analysis should be based on reasonable budget expectations to ensure that mitigation measures and resource protection will be funded, and BLM should include a fiscal analysis of alternative implementation and mitigation costs.
- Given their stewardship responsibilities, governments should encourage or undertake activities that protect the environment and discourage or prohibit those that do not. It is also appropriate for government to own and use land and water resources to protect the environment and to support others in doing the same.
- Government should continually seek to improve the efficiency of its environmental and resource management programs without compromising its responsibilities (a mixture of regulations, incentives, and public ownership of resources). It should aim to bring about as high a level of environmental quality for a given expenditure.

Alternatives Development

- IM 2005-047 provides guidance for NEPA compliance in oil and gas that supports the Energy Policy Act of 2005 and may not be valid under existing law. Specific concerns include the development of alternatives that increase/accelerate development and use of new categorical exclusions.
- We ask that at least one alternative fully explore phased development and directional drilling to the maximum extent possible.
- Consider an alternative that would only allow minimal surface disturbance.
- We ask BLM to consider an alternative that would only allow development to occur from existing oil and gas well pads, with maximum use being made of directional drilling technologies.
- Similarly, we ask BLM to consider an alternative that would not allow for any additional road construction.
- APDs that have expired will not be extended so that pending APDs may be permitted.

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- Alternatives must consider geological, technical, and other issues such as correlative and leasehold rights.
- Any constraints in the alternatives should also evaluate the additional difficulties they may generate.

Directional Drilling

- Directionally drill wells from existing well pads
- Evaluate the effect of intense development and high-density gas wells on the Department's management of Chain Lakes Wildlife Habitat Management Area, including the feasibility of using directional drilling in wetlands and sensitive areas associated with the lakes and use of artificial pads or pontoons to access development sites.
- Directional drilling is appropriate in some areas but should not be mandated for areas where it is not appropriate. Because it increases both cost and risk, directional drilling should be considered only at the site-specific analysis level.
- Use directional drilling and cluster up to 32 wells per pad and avoid intrusion into sensitive wildlife habitats.
- At the very least, directional drilling using 32 wells per pad should be required.
- Require the industry to cluster wells, up to 64 per pad, to minimize surface impacts.
- If directional drilling is to be allowed, why not specify it as the preferred method of extraction? It is a proven, economical technology that minimizes damage.
- If directional drilling is not considered a "reasonable alternative" please be specific as to the meaning of that phrase in the context of the project and its environmental impacts.
- Multiple wells should be drilled at a single location when feasible, and wildlife disturbance minimized (e.g. by automated pumping facilities).
- Include mitigation such as directional drilling and BMPs in all alternatives.
- Require directional drilling and cluster development
- Address the potential for directional drilling to minimize habitat fragmentation;
- Directional drilling should be used to access subsurface gas leases from outside the NSO area.

Mitigation and Monitoring

- Mitigation plans should include goals and objectives, methodologies, time frames for implementation, success criteria, monitoring, and a contingency plan if unsuccessful.
- Apply a standard NSO stipulation to all riparian zones and a 500-ft corridor from the outermost limit of the riparian habitat.
- During pipeline construction, avoid stripping riparian canopy or stream bank vegetation if possible. Crush or shear streamside woody vegetation rather than completely removing it. Revegetate immediately after stream bank crossings are completed.
- BLM must ensure that the impacts of any coalbed methane development are mitigated.
- Address the exception process for seasonal wildlife stipulations, which are expected to be numerous on a project this size. Note that additional data needed to accommodate industry requests should be funded by industry.

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- Consider lease and development stipulations to protect critically important wildlife and their habitats.
- Consult with Wyoming Fish and Game and USFWS early in the process to protect critical habitat.
- Discuss and evaluate monitoring data from existing gas development before developing habitat protection strategies and mitigation measures.
- Establish zones of habitat protection of areas of high wildlife value and develop habitat improvement needs in other areas.
- With regard to wildlife habitat fragmentation:
 - Develop a transportation plan to reduce access roads and traffic.
 - Bury power lines within the right-of-way to avoid impacts to raptors and other bird species.
 - Power generators by natural gas to reduce toxic emissions, and fit compressors with high-quality mufflers to keep noise to a minimum
 - Enforce any commitments agreed to by operators during the APD.
- Establish seasonal stipulations on development and production activities in big game habitats, and treatment or modification of remaining habitat or intervening fences to increase the amount or value of crucial winter habitat.
- Address mitigation for short-term and long-term impacts to habitat, and exclusion of waivers for wildlife habitat mitigation.
- Develop and implement route closure and reclamation plans to restore and maintain critical big-game habitat and linkages:
 - **Mule deer:** increase the amount of core area greater than 1,542 feet from route within crucial winter range and along migration corridors.
 - **Pronghorn:** Increase the amount of core area greater than 3,168 feet from a route and reduce route densities below one mile per square mile within crucial winter range and along migration corridors.
 - **Elk:** Reduce route densities below one mile per square mile within crucial winter range and along migration corridors.
 - Prohibit drilling and surface occupancy in big-game wintering areas between November 5 and April 30
 - Implement seasonal traffic restrictions on all roads within 656 feet of Sage-grouse winter habitat (9:00 a.m. to 5:30 p.m., mid-November through March) within 3 miles of breeding and nesting areas (9:00 a.m. to 5:30 p.m., March through mid-May), and in brood-rearing areas (900 a.m. to 5:3 p.m., June through mid-July). Impose a speed limit of 30 miles per hour during non-restricted hours.
 - Combine these species-specific recommendations with more general provisions to benefit all wildlife species in the area such as:
 - planning for staged development of energy resources
 - restricting new roads and energy development, especially within crucial winter range and at pinch points of migration routes
 - allowing few exceptions to temporary occupancy restrictions
 - imposing rigorous standards for ecological restoration of closed routes
 - for all new roads that are built, following the road construction guidelines of the Wyoming Game and Fish Department to minimize the effect of routes on wildlife

APPENDIX A—SUMMARY OF SCOPING COMMENTS

- including clear enforcement mechanisms to minimize impacts to wildlife
- continuing to research the effects of the transportation network on wildlife species and using this knowledge in adaptive management.
- Develop a clearly defined management plan to protect the grouse population and monitor the success of on-site and off-site mitigation.
- Recommend NSO designation for Sage-grouse breeding habitat between March 1 and June 30 annually and no project-related disturbance from November 15 through March 14.
- Require NSO protections within miles of Sage-grouse breeding leks.
- Consider noise mitigation alternatives such as seasonal timing stipulations, or modifying or enclosing compressors to minimize or eliminate loud, continuous noise during strutting periods from March 1 through May 20 each year. Avoid noise-generating activities from 6 PM to 9 AM within 2 miles of strutting grounds.
- Average noise mitigation levels should be attained no more than 200 meters from the noise source.
- Mitigation should include a 1¼-mile protection buffer and a 2-mile seasonal protection for the duration of the breeding season.
- Identify mitigation to protect nest sites and nesting pairs. Consider construction of artificial nesting poles.
- Include “no fencing” mitigation for roads and facilities that block pronghorn migration. Consider the possibility that pronghorn will trail along plowed access roads during periods of deep snow, and consider plowing escape ramps off roadways.
- Maintenance personnel should visit wells at midday to reduce harassment when seasonal stipulations are in effect.
- Establish mitigation to prevent exceedance of average noise standards so that courtship season is not disrupted.
- The EIS must address:
 - the extent and mitigation required for sagebrush habitat;
 - the mitigation standards for crucial winter range;
 - the use of 1-mile buffers around ferruginous hawk nest sites and burrowing owl nests;
 - implementation of a conservation community “blueprint” for Sage-grouse and Sage-grouse habitat throughout the project area;
- Screens should be fitted to burners on production facilities to prevent songbird deaths
- The overall scale of the project makes serious adverse impacts inevitable for wildlife, fisheries, and recreational opportunities. The following restrictions are requested on all development in the project area:
 - A minimum of 95-percent flareless completion on all wells
 - Directional drilling used to its full extent to reduce footprint and habitat fragmentation
 - Remote monitoring of condensate tanks
 - Bus crews rather than individual trips
 - Monitor and police traffic during critical winter range periods
 - Cluster well pads

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- Intensive mitigation to reduce noise and light pollution affecting Sage-grouse during strutting and parturition
- Dust abatement
- A minimum 3:1 ratio for off-site mitigation work to compensate for habitat fragmentation
- Reclamation with a forb/shrub mixture consisting of native plants and grasses, rather than the BLM grass mixture.
- Monitor and analyze habitats surrounding the project area to reevaluate habitat protections such as the width of buffer zones, to provide suitable habitat as development proceeds.
- Incorporate wildlife monitoring and research projects, funded by the operators.
- Apply any stipulations only where least restrictive and absolutely essential, and then only after they have been peer reviewed.
- COAs for directional drilling in sensitive areas should require BMPs in accordance with IMI2005-247 and IM2004-194, and the Gold Book, including but not limited to:
 - ACECs
 - lands with wilderness characteristics and sensitive or important wildlife habitat
 - closed-loop (pitless) drilling to help protect soils and water
 - requiring maximum use of existing roads
 - drilling multiple wells from a single pad
 - centralizing production facilities to reduce surface disturbance
 - noise reduction techniques and designs
 - wildlife monitoring
 - interim restoration to ensure lands are returned to their natural condition as soon as possible.
 - Collect baseline data and fund long-term monitoring.
- The Red Lakes Dunes citizen-proposed wilderness and other lands with wilderness characteristics should be inventoried and protected using VRM Class I or II designation, NSO limitations, and application of other BMPs.
- Include an aggressive noxious/invasive species control program (to protect forage).
- Attempt to mitigate vehicle-caused livestock losses due to increased vehicle traffic.
- Consider mitigation measures to prevent harm to agricultural water uses, including a detrimental drop in the water table.
- Require “green completions” for each new well and prohibit pit flaring during completion and fracking.
- Cease building new roads when maximum road densities are reached, until at least an equal amount of old roads are closed.
- Close and reclaim roads to dry well sites, completed wells, and where redundant or unnecessary.
- Address the use of on-site and off-site mitigation.
- Impose speed limits on heavily traveled roads where big game road kill is a concern.