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JAN 0 8 2009

Ref: EPR-N

Mr. Thomas Bills, RMP Technical Coordinator
Bureau of Land Management
Buffalo Field Office
1425 Fort Street
Buffalo, WY 82834

Re: Scoping Comments on the Buffalo Field Office Resource Management Plan Revision Project and Associated Draft Environmental Impact Statement, Wyoming

Dear Mr. Bills:

The Region 8 Office of the U.S. Environmental Protection Agency (EPA) has reviewed the Bureau of Land Management's (BLM) Notice of Intent (NOI) to prepare a revised Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS) for the Buffalo Field Office planning area. In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we offer the enclosed comments for your consideration as you proceed with the Draft RMP/EIS.

The Buffalo planning area consists of 800,000 acres of BLM-administered surface land and approximately 4.7 million acres of subsurface federal minerals. The planning area also includes Wilderness Study Areas (WSAs) and Areas of Critical Environmental Concern (ACECs). Given the significant amount of oil, gas, and coal leasing, exploration and development throughout Wyoming, the NOI identifies energy development as one of the major issues that will be addressed in the RMP/EIS.

Based on the general information included in the NOI, EPA's principle areas of focus for this upcoming land use plan include: impacts to air quality from oil and gas development; impacts to wetlands; and protection of water sources. In addition to these issues, EPA has attached recommendations for addressing cumulative impacts, water quality and other resources. EPA has also enclosed detailed recommendations for the air quality analysis.

Air Quality

Planning-level NEPA analyses, such as RMPs, provide direction for broad resource management and may be the basis for future leasing decisions. These plans provide the how, when and where for oil and gas operations. At the resource management planning level, a

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quantitative approach which includes air dispersion modeling may be necessary to provide the decision-maker with the level of information necessary to support the decision-making process. The air quality analysis should provide the decision-maker with the information to guide planning decisions such as: whether additional leasing (and the likely development authorized by such leasing) can proceed without impacting National Ambient Air Quality Standards (NAAQS) and air quality related values, such as visibility; the rate of oil and gas leasing or development; appropriate leasing stipulations; and/or necessary mitigation measures to include in drilling permits. The appropriate level of air quality analysis at the management planning stage will help to ensure that proper, proactive steps are taken to minimize adverse impacts to air quality.

In RMPs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the direct and cumulative impacts of projected energy development on air quality values within and outside of the planning area. The qualitative emission comparison approach is not specific enough to adequately address and predict air quality impacts from oil and gas development. While the qualitative emission comparison approach provides a means to compare the total predicted emissions of each alternative to a baseline year, it does not provide any indication of the potential for exceedances of ambient air quality standards or the potential for adverse impacts on air quality related values (i.e. visibility) in nearby Class I areas. In reviewing planning-level NEPA documents, EPA Region 8 typically considers the following factors in determining the appropriate level of air quality analysis. These factors, while not exclusive, and which may vary from project to project, provide some indication of the potential for air quality impacts to occur from management plans that provide for oil and gas leasing and/or development.

1. Number of projected oil and gas wells based on estimated energy resources and reasonable well density.
2. Distance of the planning area or projected well development areas from Class I airsheds.
3. Distance from other sensitive receptors (i.e., National Parks, Class II areas and population centers).
4. Distance from areas approaching a National Ambient Air Quality Standard (NAAQS). This is particularly important for ozone and fine particulate matter ($PM_{2.5}$) in the West.
5. Availability of recent, relevant, and comprehensive air quality modeling data prior to management planning Draft EIS.
6. Whether relevant, comprehensive, and cumulative air quality analysis is *concurrently* completed with a project-specific EIS in the management planning area.
7. Potential for cumulative adverse impacts to air quality from projects in adjacent planning areas.

The potential for categorical exclusions under Section 390 of the Energy Policy Act further emphasizes the need for BLM to analyze the air quality impacts and to identify appropriate mitigation measures at the RMP/EIS stage. Section 390 of the Energy Policy Act of 2005 established five statutory categorical exclusions under NEPA including an exclusion for

"drilling an oil and gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as reasonably foreseeable activity, so long as such plan or document was approved within five years prior to the date of spudding the well." A qualitative emissions comparison approach would not provide BLM with the information necessary to predict potential air quality impacts and identify appropriate mitigation measures.

While the NOI identifies energy and mineral resource exploration and development as a key issue for the Buffalo RMP revision, it does not include an estimate of the reasonably foreseeable development. Until the reasonably foreseeable development for the Buffalo Resource Management Plan area is calculated, it is difficult to definitively identify the appropriate level of air quality analysis. As the NEPA analysis proceeds, EPA would like to continue discussions with BLM the air quality analysis planned for this RMP/EIS.

Wetlands

EPA believes wetlands should be afforded the highest level of protection, either through closing certain lands to leasing or through the use of No Surface Occupancy (NSO) stipulations. This is especially true for wetland and riparian areas of WSAs/ACECs. We suggest that lease stipulations to protect wetlands be strongly considered. We note that the Record of Decision for Western Uinta Basin Oil and Gas Leasing issued by the Uinta and Ashley National Forests in 1997 required "No Surface Occupancy" (NSO) as the lease stipulation for riparian lands and wetland areas over 40 acres. For travel management in the planning area, EPA recommends BLM give preference to routes that do not have sensitive soils, wetlands, stream crossings, critical habitat, meadows, etc.

EPA recognizes the challenges facing BLM in analyzing, understanding and ultimately managing wetland resources in planning areas that cover vast areas of Wyoming. Nonetheless, the RMP/EIS should address generally the expected impacts to wetlands. More importantly, the RMP/EIS should describe specifically how wetlands will be identified, avoided, or ultimately mitigated at the project-specific level. The discussion should address situations with private land/federal minerals and federal land/federal minerals. Additional comments regarding wetlands and riparian areas are enclosed in the attached "Detailed Comments."

Water Source Protection

For areas with significant oil and gas development, water source protection may be a key issue. EPA recommends the RMP/EIS analyze the potential impacts to groundwater, drinking water, and irrigation waters. Water source protection is particularly important for oil and gas development on split estates (federal minerals/private surface) that are used for farming and ranching and where property owners may be reliant on groundwater and/or surface water for drinking and irrigation. The RMP/EIS should identify all relevant, reasonable monitoring and mitigation measures to protect these water sources even if they are outside the jurisdiction of BLM.

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EPA would like to discuss with BLM the air quality impact analysis planned for this RMP/EIS. By proactively working together early in the RMP/EIS process, we hope to be able to assist BLM with the development of an air quality analysis which will adequately address potential air quality impacts and identify appropriate mitigation measures. EPA would also welcome the opportunity to discuss water source protection. If you have any questions about our comments, please contact Joyel Dhieux at 303-312-6647, or me at 303-312-6004.

Sincerely,

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure

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Detailed Comments by the Region 8 Environmental Protection Agency
Scoping for the Draft Environmental Impact Statement
Buffalo Resource Management Plan Revision Project/Draft EIS

Air Quality

In RMPs/EISs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the direct and cumulative impacts of projected oil and gas wells on air quality values within and outside of the planning area. The analysis should disclose impacts to applicable National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments, as well as on air quality-related values in Class I areas. Specific pollutants of concern include Nitrogen Oxides (NO_x), Sulfur Dioxide (SO_2,) and fine particulate contributions to regional haze. Impacts to visibility and the potential for regional haze from the range of alternatives need to be estimated. The potential for near-field exceedance of the PM_{10} NAAQS also is a concern because of road dust emissions. The RMPs/EIS should identify all relevant, reasonable mitigation for air quality impacts, even if they are outside the jurisdiction of BLM. The probability of the mitigation measures being implemented should also be discussed.

While EPA understands broad assumptions are made at the RMP stage, the air quality analysis should include reasonable estimations of full development, including wells, compressors, drilling rigs and other surface facilities, as well as associated transportation activities. For most planning-level air quality analyses, estimates of the total number of sources can be made based on geological estimates of the recoverable oil and gas resources. Approximate locations of emission sources may be projected and sited into specific zones of the planning area based on USGS probability maps. Such estimates should be adequate to evaluate potential visibility and AQRV impacts on Class I and Class II areas and the potential impacts of air quality standards, including regional ozone and particulate matter. Site specific impacts can be analyzed when specific development plans are identified in a more detailed subsequent project-specific EIS.

Recommendations for an Air Quality Workgroup and Air Quality Modeling Protocol

EPA Region 8 recommends that BLM form an inter-agency air quality workgroup for this RMP to specifically discuss the planned approach to air quality analysis, the results of the analysis, and appropriate mitigation measures. An air quality workgroup might include members from the EPA, the State, and any other Federal or Tribal agency with management responsibilities in the area. One of the primary purposes of the air quality workgroup would be to provide feedback to BLM at the earliest stages of EIS development. With early and active communication with stakeholders throughout the process, BLM may avoid having significant issues raised during the public comment period on the Draft EIS and ultimately save significant time and money on the EIS. EPA Region 8 believes stakeholder involvement is important at all stages of the air quality analysis including the emission inventory, the modeling protocol,

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analysis of results, and if necessary identification of appropriate mitigation.

In preparing the EIS, EPA Region 8 recommends the approach used by BLM to analyze and predict air quality impacts be documented in an Air Quality Modeling Protocol and be fully vetted with the air quality workgroup. An Air Quality Modeling Protocol provides a "roadmap" for how the air analysis will be conducted and the results presented. It describes the model that will be used for analysis, including model settings, modeling boundaries, and important model inputs such as meteorology, background data and emission inventories. The Protocol should also generally describe the standards to which the air impact results will be compared. EPA Region 8 recommends that BLM circulate a Draft Air Quality Modeling Protocol among the air quality workgroup for comment and discussion. As part of this discussion, EPA Region 8 recommends workgroup members discuss and reach agreement on the emission inventories that will be used and the alternatives that will be modeled. EPA suggests BLM work with the air quality workgroup to obtain written concurrence from each member on the Protocol prior to proceeding with the air quality analysis. If significant disagreements persist, EPA recommends those issues be elevated within the respective agencies for resolution. By discussing the model, emission inventories and alternatives up front, BLM may avoid additional costly and time consuming air quality modeling analysis revisions at a later date.

As mentioned in the cover letter, EPA would like to meet with BLM to discuss the air quality impact analysis planned for this RMP/EIS. By proactively working together early in the RMP/EIS process, we hope to be able to assist BLM with the development of an air quality analysis which will adequately address potential air quality impacts and identify appropriate mitigation measures.

Air Quality Modeling and Approaches to Analysis

The level of air quality analysis may range from a qualitative emission inventory approach to an air quality dispersion model to a full robust photochemical grid model analysis. Until the reasonably foreseeable development for the Buffalo Resource Management Plan area is calculated, it is difficult to definitively identify the appropriate level of air quality analysis.

Qualitative Emission Inventory Approach

In some cases, it may be appropriate to complete the NEPA analysis using emission inventories only. For the emission inventory approach, projected emissions of key pollutants are estimated for each of the alternatives analyzed in the NEPA document. While the emission inventory approach provides a means of relative comparison between alternatives, it does not provide an estimate of the potential impacts to NAAQS or air quality related values (i.e., visibility). This method falls short of predicting the likely air quality impacts associated with these emissions, especially if there is an increasing inventory. Usually, the most appropriate use of the emission inventory approach is to demonstrate that emission changes will be negligible as a result of the federal action contemplated within the NEPA document.

For NEPA documents that use this approach, EPA Region 8 typically recommends:

- The emissions inventory include all criteria pollutants and key hazardous air pollutants (HAPs), including benzene, formaldehyde, toluene, ethylbenzene, xylenes, n-hexane, and methanol.
- The emissions inventory include quantifiable pollutant emissions from all activities or sources including: pad construction, drilling, well completion, hydraulic fracturing, production, wellhead abandonment, mobile sources, and fugitive volatile organic compounds (VOCs) and fugitive particulate matter (PM).
- The mobile sources include all traffic anticipated during the lifetime of the project, including support vehicles, condensate trucks and diesel fuel tanker traffic.
- Estimations of emissions are performed using commonly accepted methodologies and assumptions. Methods typically used include actual stack sampling, continuous emission monitoring, emission factors from AP-42 (see http://www.epa.gov/ttn/chief/ap42/index.html), calculation programs such as TANKS (see http://www.epa.gov/ttn/chief/software/tanks/index.html), and engineering calculations.
- Detailed emission inventory calculations and assumptions (i.e., drilling time, completions etc) should be transparent and provided as an appendix.

Air Quality Modeling Approaches

To ensure that an adequate level of consistency is met for the various air quality analysis conducted nationally, EPA promulgated 40 CFR 51, Appendix W Guideline on Air Quality Models (Guideline). "The *Guideline* recommends air quality modeling techniques that should be applied to State Implementation Plan (SIP) revisions for existing sources and to new source reviews (NSR), including prevention of significant deterioration (PSD). Applicable only to criteria air pollutants, it is intended for use by EPA Regional Offices in judging the adequacy of modeling analyses performed by EPA, State and local agencies and by industry. The guidance is appropriate for use by other Federal agencies and by State agencies with air quality and land management responsibilities. (40 CFR 51, Appendix W, Section 1(a)) The modeling techniques described in the Guideline are peer reviewed and used commonly to ensure consistency throughout the nation. It is generally understood that regulatory requirements and model technology undergo routine changes that necessitate that the Guideline periodically be reviewed and updated. Accordingly, EPA Region 8 recommends that modeling techniques described in the Guideline be used whenever determining pollutant impacts for NEPA-related projects.

For NEPA purposes, air quality impacts are typically determined from project specific impacts coupled with reasonable foreseeable development (RFD) sources then added to a "background" source of data usually actual monitored data to obtain the total impacts to the modeling domain. While this method results in accurate project specific impacts, the cumulative results are very dependent on the background data used. Whenever possible, EPA Region 8 recommends:

- Background data should be collected from actual monitoring locations near the modeling domain boundary. Monitored data should represent current background pollutant concentrations and not data impacted from localized sources.

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- Modeled background data should usually only be used when no monitored data is found.

Near-Field Air Quality Modeling

Industrial Source Complex (ISCST3) was the air dispersion model used nationally for near-field air quality impacts for over 20 years. The discussion in the Guideline, Section 4.1(d) describes advances made to air dispersion modeling since ISCST3 was developed. To better characterize plume behavior EPA developed AERMOD. The AERMOD air dispersion model has the capability to better account for interaction near the earth's surface which can include complex terrain in the near field and local scale meteorology factors. Accordingly, AERMOD is EPA Region 8's preferred recommended method to determine criteria pollutant impacts up to 50 km downwind and is referenced in the Guideline. EPA Region 8 recommends that the AERMOD model should generally be used for determinations of criteria pollutant impacts (AERMOD is not applicable for determining ozone concentrations, since it does not contain a photochemical algorithm), hazardous air pollutants and PSD increments on Class I and II areas. EPA Region 8 also recommends that meteorological data used in the analysis should be a collection of at least one year from onsite measurement station or three to five years of data from an nearby National Weather service (NWS) or collected from another nearby meteorological monitoring station conforming to the Meteorological Monitoring Guidance for Regulatory Modeling Applications, February 2000, EPA-454/R-99-005. http://www.epa.gov/scram001/guidance/met/mmgrma.pdf.

Far-Field Air Quality Modeling

Neither the ISCST3 nor the AERMOD models are capable of determining chemical transformations or particle deposition. It is generally necessary to account for chemical transformations to accurately determine regional haze, visibility and deposition of aerosol impacts from emissions of NO_x, SO_x and VOCs. Further, the near field models do not account for distant pollutant transport longer than 50 km. The Guideline references CALPUFF as the preferred model method to predict pollutant impacts from long range transport (more than 200km) from a large number of sources. The CALPUFF model includes chemical transformation and deposition algorithms that enable predictions of visibility and deposition impacts; in addition to criteria pollutants. CALPUFF is not applicable for determining ozone concentrations because the model lacks a photochemical algorithm. For NEPA analyses, EPA Region 8 believes it is appropriate to use the CALPUFF model to characterize visibility impacts for a group of sources. Meteorological grid spacing should be set to maximize the accuracy of predicted impacts near the project center. Consideration should be made to the terrain surrounding the project area. More complex terrain may require the higher resolution, such as 4 km grid spacing areas as has the practice in many of the recent CALPUFF Regional Haze BART modeling applications in the western U.S. (i.e., WRAP, MT, BART modeling protocols). It is common to "nest" grid spacing to obtain accurate impact results and minimize computing run times. A typical nesting arrangement may consist of a 36, 12 and 4 km horizontal gridded resolution. When using the CALPUFF model, EPA Region 8 recommends that monthly ozone monitored data for nitrate conversion calculations should be used from sites located near the modeling domain boundary. EPA Region 8 also recommends that monthly ammonia (NH_3)

monitored data for nitrate conversion calculations should be used from sites located near the modeling domain boundary, if no data are available, 1.0 ppb should be used for NH_3 as the default value for the western U.S.

A significant level of computing requirements may be needed for CALPUFF, including three-dimensional wind profiling that considerably increases the amount of data preparation, analysis time and computer support necessary. However in some cases previously processed wind/meteorology data may be applicable and available for use in the new analysis. Screening models are also available and may be used in appropriate circumstances. A screening version of CALPUFF, known as CALPUFF-Lite, has been successfully utilized to determine visibility and deposition impacts from smaller numbers of sources. To calculate visibility impacts from a very small number of sources in a limited domain area another screening model, VISCREEN, may be also used in lieu of CALPUFF. VISCREEN requires far less data preparation and computer analysis time than the CALPUFF model, however, it is limited in predicted impacts range to 50 km. If CALPUFF-Lite or VISCREEN predict air quality impacts, more refined modeling and/or mitigation measures may be recommended.

Photochemical Grid Modeling

Although the models described above for near-field and far-field analysis are acceptable approaches, it is anticipated that in the very near future with appropriate model validation analyses, the use of photochemical grid models for all pollutants and air quality related values (i.e., visibility) may be the most effective and accurate approach. Grid models, including CMAQ and CAMx modeling systems, have been designed to approach air quality as a whole by including state-of-the-science capabilities for modeling multiple air quality issues, including tropospheric ozone, fine particles, toxics, acid deposition, and visibility degradation. CMAQ and CAMx were designed to have multi-scale capabilities so that separate models were not needed for urban and regional scale air quality modeling. EPA Region 8 recommends photochemical grid modeling for larger project areas where ozone is of concern. EPA Region 8 notes that until the reasonably foreseeable development for the Buffalo Resource Management Plan area is calculated, it is difficult to definitively identify the appropriate level of air quality analysis and whether this approach should include a photochemical grid model.

Since screening-level ozone models are not available, a new modeling analysis for the proposed project would likely be resource intensive. Time and resources could be minimized by tiering off the analysis from a recent ozone study in a nearby area, or including the proposed project in a regional-scale ozone planning study such as those being conducted for State Implementation Planning (SIP) purposes. Where such analyses are not available, estimates of the proposed project's emissions of ozone precursors should be made and compared to existing local and regional emission inventories of these pollutants.

Results of Air Quality Impact Analysis

The NEPA document should disclose the direct, indirect and cumulative impacts of a proposed action to air quality. EPA Region 8 recommends that predicted impacts from the

direct, indirect and cumulative sources on the surrounding areas be compared against the NAAQS, the PSD Increments, the Air Quality Related Values (AQRVs), HAPs Relative Exposure Limits and chronic inhalation exposure guidelines (See Appendix B). Comparisons of modeled impacts to the State air quality standards should also be considered. The NAAQS, PSD Increments and typical HAPs are provided in Appendix C.

Visibility Analysis

The Clean Air Act requires special protection of air quality and air quality related values (such as visibility) in many of the nation's wilderness areas and national parks. Subpart II of Part C of the Clean Air Act prescribes a program specifically for the protection of visibility in federal Class I areas and establishes "as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Class I federal areas which impairment results from man-made air pollution." EPA's implementing regulations require states to submit implementation plans that contain such measures as are necessary to make reasonable progress towards the national requirements, and that states establish reasonable progress goals toward improving visibility on the worst days and preventing further degradation in visibility during the best days. Actions by Federal Land Managers that lack adequate mitigation of potential visibility impacts could impede states' ability to submit State Implementation Plans that meet the Clean Air Act requirements.

In addition to its visibility provisions, the Clean Air Act contains general provisions for a Prevention of Significant Deterioration (PSD) program designed to protect federal Class I areas from air quality degradation under Subpart I of Part C. The PSD program places an affirmative responsibility on Federal Land Managers to protect air quality in many of the most important national parks and wilderness areas in the nation from human-caused pollution. The Wilderness Act further directs the federal land management agencies to protect the wilderness character of those areas designated as wilderness. In that Act, Congress recognized the importance of preserving designated areas in their natural condition and declared a policy to "secure for the American people of present and future generations the benefits of an enduring resource of wilderness."

To the extent that this RMP's air quality analysis considers impacts to visibility in Class I areas or other sensitive airsheds, EPA Region 8 recommends:

- The analysis be performed using CALPUFF, at a minimum, with appropriate regulatory methodology using Methods two or six for relative humidity inputs. Methods two and six have both undergone extensive peer review and are widely considered to be the most reliable.
- The air quality analysis includes predicted impacts at both 0.5 deciview and 1.0 deciview. A 0.5 deciview change in visibility is considered the level at which a proposed action *contributes* to visibility impairment. A 1.0 deciview change is the level at which a proposed action *causes* visibility impairment. These methodologies and impacts should be summarized in the main body of the NEPA document.

- Screening-level models such as CALPUFF-Lite or Viscreen may be used for visibility and deposition analysis for projects where more extensive air quality modeling is not required (i.e. an exploratory well proximate to a Class I area or National Park). However, if impacts are shown using these types of screening models, more refined modeling and mitigation may be required to fully disclose the impacts of the proposed federal action.

Air Quality Mitigation

If this RMP's air quality analysis discloses significant, adverse impacts to air quality, EPA Region 8 recommends the Draft EIS include specific and detailed mitigation measures to address the impacts. The Draft EIS should also include modeled demonstrations that the mitigation measures will be effective. A significant, adverse impact to air quality may include predicted violations of a NAAQS and/or predicted adverse impacts on air quality related values (i.e., visibility impacts to a Federal Class I area). A NEPA document that discloses significant air quality impacts may receive an adverse rating from EPA unless specific mitigation measures are identified and demonstrated to be effective. For air quality analyses that predict impacts that approach the NAAQS, it may also prudent to consider and implement appropriate mitigation.

Air quality mitigation measures may include, but are not limited to:

- Tier II or greater drilling rig engines (i.e. natural gas drilling rigs)
- Electric drilling rigs
- Selective catalytic reduction or other secondary emission controls on drilling rig engines
- Fuel additives
- Electric or natural gas-fired compression
- Reduced pace of development
- Phased development
- Centralization of gathering facilities
- Emission offsets
- Green completions
- Low or no flow pneumatic valves
- Additional EPA Gas Star program measures

Cumulative Impacts

In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. A cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area, not just

already approved "on-the-ground" projects. Examining activity trends in other areas with similar uses and contributory metrics can also be useful in this analysis. Also, the appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration.

Protection and Mitigation of Wetlands and Riparian Areas

EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include damage or improvement to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storage, groundwater recharge and discharge, sources of primary production, and recreation and aesthetics. Road and pipeline construction, grazing, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity, and are often critical to the protection of water quality and beneficial uses.

EPA encourages BLM to identify wetlands and plan for appropriate mitigation. We suggest BLM require delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before any activity occurs so efforts may be made to protect them. We also recommend the establishment of wetland and riparian habitat 100-foot buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. Due to the time it can take to adequately reclaim some disturbed wetlands, EPA suggests BLM require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible. As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, EPA also suggests BLM require a minimum of two-to-one mitigation of wetland disturbance. The EIS should specify general mitigation requirements, and require any specific projects to generate a wetland mitigation plan.

Water Quality Impacts

The EPA recommends the RMP/EIS include an accurate description of surface and ground water resources, as both are essential to understanding the potential effects of any management alternative. The RMP/EIS should clearly describe water bodies within the analysis area which may be impacted by resource management activities. Identifying affected watersheds on maps of the various alternatives helps convey their relationship with project activities.

The EIS should analyze potential impacts to surface water, groundwater, and existing and potential drinking water. Impacts to consider include: water quality, quantity, and any adverse change to current water quality of any rivers, streams and their tributaries. No Surface Occupancy (NSO) lease stipulations may be appropriate to protect current or potential drinking

water sources. In un-leased areas, terms and conditions should be considered to protect non-mineral resources, including NSO lease stipulations as appropriate. For leased areas, Best Management Practices (BMPs) and mitigation measures should be used to protect these resources and designed into the alternatives under consideration.

The RMP/EIS should also disclose the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, stream bank vegetation, and riparian habitats. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.

Effects on Vegetation, Wildlife Habitats and Area Hunting/Fishing

The effects of resource management activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the RMP/EIS. This is particularly important for the wilderness study areas (WSA) and areas of critical environmental concern (ACEC) contained in the planning area. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; noxious weed management; any adverse impacts to BLM State sensitive plants; and/or compliance with executive orders concerning invasive species, flood plains, or wetlands and riparian zones. Important wildlife issues include: compliance with BLM, USFWS, or State wildlife management objectives for natural gas mineral developments; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, or BLM State sensitive wildlife or fish species. The RMP/EIS should include mitigation measures that may be undertaken to minimize or eliminate adverse impacts from the alternatives considered.

Noxious Weeds and Invasive Plants

EPA supports the goal of preventing the introduction and spread of invasive plants and noxious weeds. Among the greatest threats to biodiversity is the spread of noxious weeds and exotic (non-indigenous) plants. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. Oil and gas development activities, grazing, and off highway vehicle (OHV) use can cause such disturbances.

EPA supports integrated weed management including the effective mix of cultural education and prevention, biological, mechanical, chemical management. However, we

encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on herbicides being the last resort. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality. There are a number of prevention measures available such as reseeding disturbed areas as soon as possible and cleaning equipment and tires prior to transportation to an un-infested area.

The RMP/EIS should list the noxious weeds and exotic plants that occur in the resource area. In cases where noxious weeds are a threat, EPA recommends the document detail a strategy for prevention, early detection of invasion, and control procedures for each species.

Affect on Visual Character and Scenic Resources

Visual impacts associated with the project's facilities and activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and operational activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities; how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or the potential to reclaim disturbed landscapes. The RMP/EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.

Potential Effects on Local Communities from Oil and Gas Development, and Reasonably Foreseeable Development Considerations

The RMP/EIS should consider environmental related socio-economic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, and increased road traffic with associated dust and hazardous materials spill potential. Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. The reasonably foreseeable development evaluation should address the additional loading that could be placed on local communities' abilities to provide necessary public services and amenities, and methods that could potentially avoid or minimize such impacts.

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed in 1994, applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the RMP/EIS should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonably foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed. Close coordination with any

potentially future impacted Native American tribes, is important.

Management, Mitigation and Monitoring

Oil and gas development, recreational use, grazing, and related activities are among the planning activities requiring management, mitigation, and monitoring. Various impacts can be minimized or potentially eliminated if Best Management Practices (BMPs) and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the RMP/EIS. Also, it is important to specifically designate what entity (e.g., BLM, the proponents, resource organizations, or some combination) will be in charge of which activities, and which will have specific enforceable accountability. In addition, the BMPs, mitigation measures and other related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. It may be appropriate for the proponents to fund an account from which 3rd party contractors can be contracted to perform inspections and monitoring, and/or the implementation of some of the mitigation measures. Please provide details on the issues discussed above in the EIS, preferably in a separate monitoring plan. It may also be appropriate to have commitment for these activities placed in the ROD.

Off-Highway Vehicles

The popularity of Off-Highway Vehicles (OHVs) has increased dramatically and is expected to continue, due to population growth, advances in recreation technology, increased availability of information and improved access to remote areas. EPA supports efforts to address motorized use resource damage, monitoring issues, known user conflicts, and enforcement issues. EPA also supports the transition from unmanaged motorized recreation to restricted travel. Restricted or limited travel is necessary to ensure that resources are protected and that other non-motorized recreation is accommodated. Unmanaged OHV use on federal lands has resulted in unplanned roads and trails, erosion, damage to wet meadows, soils and stream channels, and increasing degradation of recreational experiences such as horseback riding and hunting. The RMP/EIS should provide a thorough analysis of impacts from OHV use. The analysis should include prevention or mitigation of adverse impacts from OHVs to soils, watersheds, vegetation, wildlife habitat, water quality, cultural resources and other assets of the planning and decision areas.

Comment Documents 1084-1093 have been intentionally removed.

1094

Harvey Reading <reading178@hotmail.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/16/2008 08:43 PM	
Please respond to Harvey Reading <reading178@hotmail.com>	

Dec 16, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Quit selling out to oil and gas interests. Public lands are for the PUBLIC, not for corporations. I hope the next prez gets some appointee-level people in who will listen to BLM scientists instead of to corporate lies. Start doing your jobs in a manner that represents the trust placed in you by the people of this country.

1094

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation.
The Bighorn Mountains are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

N/A Harvey Reading
PO Box 551
Shoshoni, WY 82649-0551

1095

Donald DeVore <ddevore@vcn.com> Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>		To BRMP_Rev_WYMail@blm.gov cc Subject RMP Comment to protect WY's public lands
12/16/2008 08:44 PM		
Please respond to Donald DeVore <ddevore@vcn.com>		

Dec 16, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

The title of the message I received from the Sierra Club is "tell the BLM that Wyoming is not for sale." In all honesty, I doubt that is the case. Wyoming IS for sale. And the BLM is selling it.

Does anyone want all of northeastern Wyoming to be Gillette? Slow down the growth. A lot of folks here in town are already calling the mountains West of town Gillette West. Slow down the growth.

1095

Campbell County is already among one of the worst counties in the nation for toxic air emission levels. Bo we want that in Buffalo? You live here too.
The mountains just above Buffalo are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources. That's why we live here. Don't sell it to the highest bidder.
Thank you for your attention to these very important issues.

Sincerely,

Mr Donald DeVore
603 Fullerton Ave
Buffalo, WY 82834-2504

Comment Documents 1096-1107 have been intentionally removed.

1108

Peter & Eva Crane <pocrane@wyoming.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/16/2008 09:43 PM	
Please respond to Peter & Eva Crane <pocrane@wyoming.com>	

Dec 16, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation. The Bighorn Mountains are often clouded by haze from particulate

1108

matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Clouds of polluting haze are frequently seen in the Pinedale area as well resulting in air quality warnings.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

Dr and Mrs Peter & Eva Crane
658 Hancock Dr
Lander, WY 82520-9612

Comment Document 1109 has been intentionally removed.

1110

Dirk Murcray <dmurcray1@msn.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/17/2008 06:44 AM	
Please respond to Dirk Murcray <dmurcray1@msn.com>	

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the nation for toxic air emission levels. Sublette, Sweewater, and Carbon Counties are not far behind. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation.

1110

The Bighorn and Windriver Mountains are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development. Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

Mr Dirk Murcray
925 Lincoln Ave
Rock Springs, WY 82901-7219

Comment Documents 1111-1113 have been intentionally removed.

1114

Melanja Jones <melanjaj@gmail.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/17/2008 07:44 AM	
Please respond to Melanja Jones <melanjaj@gmail.com>	

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation. The Bighorn Mountains are often clouded by haze from particulate

1114

matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.
I love Wyoming and want my children to be able to experience it's

beauty as well. Please make sure resource extraction is managed to make sure future generations can enjoy the wonderful Wyoming landscapes as well

Sincerely,

N/A Melanja Jones
PO Box 304
Big Horn, WY 82833-0304

Comment Documents 1115-1119 have been intentionally removed.

1120

Maeve Fitzgerald <sheeelady@yahoo.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/17/2008 08:44 AM	
Please respond to Maeve Fitzgerald <sheeelady@yahoo.com>	

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation. A partial solution to some of the air pollution would be to have the

1120

oil/coal producers pave the dirt roads they now use. I spend some time in the Red Desert area of Wyoming and plan to do plant husbandry

there, and I have observed that the big rigs working the oil fields and driving over the dirt/gravel roads produce a tremendous amount of the haze in the air. Furthermore, modifications need to be made to the trucks that reduce the pollution they put into the air.

The Bighorn Mountains are often clouded by haze from particulate matter

(created in the above described manner and the direct emisions from the oil/coal processing plants themselves). The BLM needs to address these serious health concerns before deciding to lease more land to energy development. These health issues are not only limited to the residents of Wyoming but surrounding states as well because of the prevailing westerly winds.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources, requiring oil/coal companies to pave roads and reduce vehicle and plant emissions to prevent air and water pollution before being granted the privilege of drilling or mining.
Thank you for your attention to these very important issues.

Sincerely,

Ms Maeve Fitzgerald
45 Purple Sage Rd Lot 112
Rock Springs, WY 82901-6825

1121

Linda Serdiuk <lserdiuk@wyoming .com> Sent by: Sierra Club Membership Services <membership.servi ces@sierraclub.or g>	BRMP_Rev_WYMail@blm.gov	To cc Subject
12/17/2008 08:44 AM	RMP Comment to protect WY's public lands	
Please respond to Linda Serdiuk <lserdiuk@wyoming .com>		

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

The BLM seems to be trying to fulfill the prophecy of former Wyoming governor Jim Geringer: Wyoming will be the next Saudi Arabia. Wow..and ain't we proud?

1121

Sincerely,

Mrs Linda Serdiuk
PO Box 42
Lander, WY 82520-0042

Comment Documents 1122-1140 have been intentionally removed.

1141

Geoff Baumann <flintspears@yahoo.com>	To
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	BRMP_Rev_WYMail@blm.gov
	cc
	Subject
	RMP Comment to protect WY's public lands
12/17/2008 02:15 PM	
Please respond to Geoff Baumann <flintspears@yahoo.com>	

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

I have long had respect for the BLM, having lived and prowled around Wyoming for decades. I have always spoken highly of the Bureau. But

now I am not so sure. There is so little wild and undisturbed land left and so many generations to come. Can't you be a hold out against shot

1141

term gain? The times are changing, please don't get on the greed wagon, energy sources will change, help them change faster by not developing any more fossil fuels and roads to waste it on.

Sincerely,

N/A Geoff Baumann
1116 Road 9 1/2
Powell, WY 82435-9255

1142

Jeanne Leske <jeanne.leske@gmail.com>	
Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov
	cc
	Subject RMP Comment to protect WY's public lands
12/17/2008 02:44 PM	
Please respond to Jeanne Leske <jeanne.leske@gmail.com>	

Dec 17, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation. The Bighorn Mountains, and many other places where I hike on public

1142

land, are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

Ms Jeanne Leske
2001 Newport St
Casper, WY 82609-3803

Comment Documents 1143-1163 have been intentionally removed.

1164

KIm CArlson
<samadhi39@hotmai
l.com>
Sent by: Sierra
Club Membership
Services
<membership.servi
ces@sierraclub.or
g>

To: BRMP_Rev_WYMail@blm.gov
cc:
Subject: RMP Comment to protect WY's public lands

12/22/2008 08:25
AM

Please respond to
KIm CArlson
<samadhi39@hotmai
l.com>

Dec 22, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

What are you people thinking? Even the evil ,idiot child Bush admits there is global warming. Why put more on Obama's plate that he is just going to overturn and spend more money on to study the obvious. Campbell County is already among one of the worst counties in the

1164

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation.
The Bighorn Mountains are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

N/A KIm CArlson
PO Box 1017
Driggs, ID 83422-1017

Comment Documents 1165-1174 have been intentionally removed.

1175

Charles Craig <lizc512@yahoo.com> Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	To BRMP_Rev_WYMail@blm.gov cc Subject RMP Comment to protect WY's public lands
12/23/2008 02:13 PM	
Please respond to Charles Craig <lizc512@yahoo.com>	

Dec 23, 2008

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation.

1175

The Bighorn Mountains are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.

The damage to Sublette County from similar activity is another example of what the oil indutstry has done to Wyoming. The Green River basin

has been compromised and the pronghorn antelope population has suffered as well.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

Mr and Mrs Charles Craig
518 Grande St
Driftwood, TX 78619-9771

Comment Documents 1176-1191 have been intentionally removed.

1192

Sara Pevsner-Lindsey <saraleelindsey@hotmail.com> Sent by: Sierra Club Membership Services <membership.services@sierraclub.org>	BRMP_Rev_WYMail@blm.gov	To cc Subject
01/07/2009 09:46 AM	RMP Comment to protect WY's public lands	

Please respond to
Sara
Pevsner-Lindsey
<saraleelindsey@hotmail.com>

Jan 7, 2009

RMP Project Manager, Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Dear RMP Project Manager, Bureau of Land Management,

I would like to submit my comments concerning the Buffalo Resource Management Plan Revision.

I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces, environment and the quality of air and water resources.

Wyoming's public lands are negatively impacted by the rapid development of coal, coalbed methane, and oil and gas resources.

I urge the BLM to slow the pace of coal, coal bed methane, and oil and gas development. Much of these public lands are currently inaccessible to the public. They are no longer multi-use and are exclusively set aside for energy development. This is a disturbing trend in Wyoming that needs to be reversed in order to protect the open spaces and environment that we value as well as to protect our basic right to clean air and clean water.

Campbell County is already among one of the worst counties in the

1192

nation for toxic air emission levels. Nitrogen oxide and sulfur dioxide emissions also elevated in comparison to the rest of the nation.
The Bighorn Mountains are often clouded by haze from particulate matter. The BLM needs to address these serious health concerns when deciding to lease more land to energy development.
Water resources are equally under attack. Energy development requires an enormous amount of water in an already water scarce region. Our streams are being polluted by all of the development. Please work to protect water quality and quantity.
I urge the Bureau of Land Management to adopt a revised plan that places priority on Wyoming's open spaces and the quality of air and water resources.
Thank you for your attention to these very important issues.

Sincerely,

Ms Sara Pevsner-Lindsey
3301 March Ln
Garland, TX 75042-5423

Comment Documents 1193-1202 have been intentionally removed.