

Working to Guarantee You a Place to Hunt and Fish!

December 16, 2010

Mr. Mark Thonhoff
Pinedale Field Office – BLM
1625 West Pine Street
PO Box 768
Pinedale, WY 92941

RE: Proposed Adaptive Management Measures for the Pinedale Anticline Project Area.

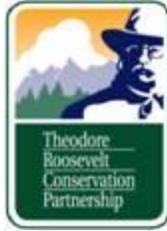
Dear Mr. Thonhoff:

On behalf of the Theodore Roosevelt Conservation Partnership (TRCP), we appreciate the opportunity to comment on this important issue regarding the proposed adaptive management measures for the Pinedale Anticline Project Area (PAPA).

Prior to industrial development, the Pinedale Anticline was referred to, by many, as the “Serengeti of Wyoming” due to its abundant wildlife populations and diversity. Once a mecca for mule deer, drawing wildlife viewers and hunters from abroad, this population may now be in peril. According to the latest published monitoring report (*Western EcoSystems Technology, Inc. 2010*); the local mule deer population has declined by approximately 60% since the influx of development began in the year 2000. The study indicates that the loss of suitable habitat has most likely contributed to the severe decline of the PAPA mule deer population.

According to the *2006 U.S. Fish & Wildlife Service - Wildlife Related Activities report*, Wyoming’s wildlife, excluding fisheries, generates more than \$525 million for Wyoming’s annual economy. Hunting license sales for mule deer, elk, and pronghorn make up a major portion of this income. The Sublette mule deer herd, which consists of the portion of the herd that is adversely impacted by this development, has long been a “destination” hunting opportunity for residents and non-residents alike and the declining deer herd will, no doubt, impact hunting opportunities as well as the economic benefits provided by hunting.

TRCP understands and values Wyoming’s wildlife resources, as well as its hunting and angling opportunities. We also understand the importance of energy resources to our country, but encourage you, the Pinedale BLM Office, to immediately implement changes to the way



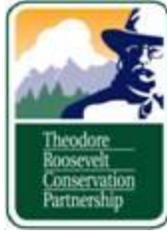
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habitats and energy development are being managed to ensure a positive future for wildlife and hunting and fishing opportunities.

By failing to act on the current mule deer declines, you are putting a highly valued native species at risk; you will also be putting energy development at risk; and you will also be putting the future of energy development at risk. Effective adaptive management is based on a principle that you have actions ready to implement once impacts are recognized and those actions will be based on preventing further declines and maintaining objectives for wildlife. The future of wildlife and energy development is in your hands – TRCP encourages you to make fundamental and necessary changes to the adaptive management plans and mitigation that goes well beyond what you have publically stated.

Below is a list of concerns that TRCP has with the current proposed adaptive management plan:

- 1) Many recommendations from the Wyoming's Cooperative Fish & Wildlife Research Unit (Co-Op) scientists review have been discounted or not dealt with for the key species, including mule deer. TRCP recommends full implementation of all of the review.
- 2) To make the best use of the Co-Op review to improve the wildlife matrix and monitoring, these proposals should be reviewed by the same scientists to avoid continuing the mistake(s) of conducting monitoring that is not adequate.
- 3) The proposed actions remove Wildlife Matrix criteria that have been found inadequate and do not replace them. Therefore, not providing benchmarks for wildlife populations and demographics and therefore cannot adequately address impacts created by energy development and mitigation actions intended to alleviate those impacts. TRCP recommends revising the matrix to address these deficiencies.
- 4) Overall, the response to the scientific review and monitoring results seems to be to retreat to counting animals as the main way to determine if negative impacts are occurring. This is very concerning given there has been a long-term, well designed research program on sage grouse, mule deer, and other species that could be continued. TRCP recommends re-designing the matrix and monitoring to address more than just the number of animals present, but to address the true impacts created by development and the long-term impacts to the health and sustainability of the impacted wildlife populations, particularly mule deer, sage grouse, and pronghorn.



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- 5) As suggested by the review, TRCP recommends a more complete understanding of various demographic characteristics for impacted wildlife populations, not less. This is needed to fully demonstrate what is happening to populations of animals affected by development, and most importantly to allow specific actions to be taken to mitigate impacts.
- 6) The main driver for limiting the scope of monitoring seems to be cost, staff time or “we think we have enough information” rather than positive actions to improve the ability to detect problems and provide a better foundation to mitigate them. TRCP recommends a specific mitigation plan to address all losses of wildlife and habitat to-date, a structured approach to any future mitigation actions (on-and-off-site), and a rigorous review process for annual monitoring, mitigation, and funding allocation by a third party, independent review team.
- 7) These actions do not constitute the adaptive response needed to prevent further losses of affected wildlife and/or habitats, but rather continue the practice of avoiding dealing with problems in the limited target of monitoring. TRCP recommends complete implementation of the Co-Op review recommendations and further independent evaluation of the adaptive process.
- 8) The adaptive management process being used should be reviewed by an independent third party and all recommendations for changes should be incorporated. In addition, the adaptive management process must be brought into compliance with the exiting DOI adaptive management manual for use of the concept.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Thagard". The signature is fluid and cursive, with a large loop at the end.

Neil Thagard
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