

**Phoonswadi-Brewer, Sean**

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**From:** NPL\_AR  
**Subject:** Normally Pressured Lance Natural Gas Development Project - Comments from TRCP  
**Attachments:** pic02125.jpg; Pinedale BLM NPL'11.pdf

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"Neil Thagard"  
 <nthagard@trcp.org>

05/12/2011 04:31  
 PM

To  
 <[NPL\\_EIS\\_WY@blm.gov](mailto:NPL_EIS_WY@blm.gov)>

cc  
 "Steve Belinda" <[sbelinda@trcp.org](mailto:sbelinda@trcp.org)>  
 Subject  
 Normally Pressured Lance Natural  
 Gas Development Project - Comments  
 from TRCP

Ms. Roadifer:

Please accept the attached letter/comments from TRCP regarding the NPL project.

Sincerely,  
 Neil

Neil Thagard  
 Western Energy Coordinator  
 Theodore Roosevelt Conservation Partnership  
 (208) 861-8634  
[www.trcp.org](http://www.trcp.org)

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 (See attached file: Pinedale BLM NPL'11.pdf)



# Theodore Roosevelt Conservation Partnership

GUARANTEEING YOU A PLACE TO HUNT AND FISH

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May 12, 2011

Ms. Kellie Roadifer  
BLM Pinedale Field Office  
1625 West Pine Street  
PO Box 768  
Pinedale, WY 82941

**RE: Normally Pressured Lance Natural Gas Development Project.**

Dear Ms. Roadifer:

On behalf of the Theodore Roosevelt Conservation Partnership (TRCP), we appreciate the opportunity to provide brief comments that we hope you and your staff will take into consideration as you work through the scoping process toward a science-based end product.

The following must be addressed as this project moves forward through the environmental analysis and any subsequent decisions and authorizations:

1. Cumulative impacts to fish, wildlife (and their habitats), and outdoor recreation from the previously developed and authorized energy projects in the upper Green River, including, but not limited to, the Jonah Infill, Pinedale Anticline, Fontenelle, Big Piney/LaBarge, Riley Ridge, South Piney, Plains Exploration/Noble Basin, Jack Morrow Hills, and other adjacent energy development projects.
2. Recent scientific information including, but not limited to, the Sawyer et al. work on mule deer, Holloran, Naugle, Kaiser, and Lyons work on sage grouse, Berger's work on pronghorn, and any new information that has been developed since the authorization of the Jonah II project decision that overlaps with the Normally Pressured Lance boundary.
3. Inclusion of the Wyoming core sage grouse strategy, Western Association of Fish and Wildlife Agencies evaluation of sage grouse and mule deer, North American Mule Deer Conservation Plan, Mule Deer Eco-regional Habitat Guidelines, state-wide Wyoming Mule Deer Initiative, Greater Sage Grouse Conservation Strategy, including the recent listing decision from the U.S. Fish and Wildlife Service, as well as, specifics of how the Wyoming Game and Fish Department population objectives and strategies for wildlife published in the Comprehensive Wildlife Conservation Strategy are going to be achieved.
4. Recent Council on Environmental Quality guidelines regarding how mitigation must be implemented if a Finding of No Significant Impact is based on mitigation.
5. Guidelines on how categorical exclusions are to be used in a tiered NEPA process.
6. Recent policy and guidance on how BLM Master Lease Planning and Energy Lease Reforms will be implemented for this project and surrounding areas.

7. Clear and accurate identification of migration routes for pronghorn and mule deer, any winter range and parturition areas for mule deer, pronghorn, and sage grouse and all actions that will be implemented to maintain functional migration routes and seasonal wildlife ranges.
8. No use of the Burma or Antelope roads for project access should be permitted – as negotiated in the Jonah II project decision. The only access that should be utilized is the Lumen Road.
9. How mitigation and compensation for impacts will be managed and how funding to implement this mitigation will be secured.
10. A rigorous and structured approach to impact analysis, monitoring, and mitigation should be implemented including an updated baseline inventory for all fish and wildlife resources (and their habitats), and outdoor recreation.
11. Phased development should be implemented for this project given recent impacts to wildlife and recreation resources – including impact thresholds based on science and stakeholder involvement that will sustain fish, wildlife (and their habitats), and outdoor recreation throughout all phases of development.

In addition to the previous comments, the TRCP request that the BLM establish options that ensure responsible energy development in a way that sustains fish & wildlife. The TRCP's recommendations and priorities regarding management of fish and wildlife during energy development are organized under the five fundamentals of Funding, Accountability, Coordination, Transparency, and Science (FACTS).

In 2006, the TRCP released the "FACTS for Fish and Wildlife," specific recommendations for balancing fish and wildlife needs with the development of energy resources. Revised in 2011, the current FACTS document updates those recommendations, expands their applicability to broader geographic regions, and addresses forms of energy development beyond traditional oil and gas. The FACTS principles allow for fish and wildlife stewardship through better policy and management during energy development.

The FACTS recommendations are applicable, with few exceptions, to land and water, traditional or renewable energy, public or private lands, and infrastructure associated with development. They can increase our ability to responsibly manage fish and wildlife during energy development, balance competing values, become conservation stewards and ensure a future for our fish and wildlife populations. These practices – driven by the FACTS – will sustain and uphold our nation's shared natural resources and unique outdoor legacy.

Funding is required for adequate fish and wildlife management. Historically, fish and wildfire programs have been underfunded or relied on funding sources other than federal monies. While funding alone will not solve the problem, it plays a critical role in our ability to balance energy development with the needs of fish and wildlife. Funding must be secure, substantial and properly allocated to make a difference. TRCP recommends that you:

- Determine adequate funding for sustainable fish and wildlife management in areas proposed for energy development.
- Prior to development, identify and secure appropriate funds for fish and wildlife monitoring and mitigation, including compensation if necessary or required.
- Establish a long-term, dedicated "mitigation trust" to benefit fish and wildlife that is funded by royalties, rents, fines or voluntary payments.
- Ensure that funds designated and intended for fish and wildlife management are not redirected to other causes.
- Work cooperatively with various funding sources to leverage additional federal or state grants.

Accountability entails accepting responsibility for actions. On public lands, promises are made through various decision strategies and should be considered “contracts with the people” that mandate proper stewardship of the nation’s lands and minerals. TRCP recommends that you:

- Proactively address fish and wildlife management needs with a specific “conservation strategy” for each energy field or project. Finalize conservation strategies before development starts and specify recommendations and actions to minimize impacts and establish plans for mitigation, detailed monitoring and adaptive management.
- Establish and update regularly a system of tracking commitments, in plans or agreements, along with any actions contrary to those commitments.
- Ensure that laws, regulations and policies intended to conserve and protect fish and wildlife during energy development are not abdicated or abridged.
- Utilize lease development plans or master lease planning to evaluate and address potential impacts to fish and wildlife prior to development.
- Notify the public and allow public comment on energy development projects involving public lands or resources. Provide the public with information regarding modifications to current development plans.

Coordination is essential in ensuring that fish and wildlife are properly managed, within and across administrative boundaries. All stakeholders must be involved, and experts that manage fish and wildlife at the local, state or national levels must be included in energy project planning and implementation. Coordination enables unanticipated or unforeseen actions that arise during development to be addressed in a timely and appropriate manner. A key stakeholder in the administration of public lands and fish and wildlife resources, the public must be included to build trust and brainstorm management tactics. TRCP recommends that you:

- Foster broad-based coordination between fish and wildlife managers, landowners and affected stakeholders to ensure fish and wildlife sustainability.
- Establish expanded coordination across geo-political boundaries between property owners (public and private). Ensure that managers consider the crucial habitats as well as movement or transitional corridors of fish and wildlife.
- Coordinate among all affected stakeholders during planning and implementation of public-lands energy projects.
- Include state fish and wildlife agencies in energy development planning and the monitoring of fish and wildlife during and after development.
- Establish a process for annual review and adjustments of actions that affect fish and wildlife. An adaptive management strategy is appropriate if based on established adaptive management guidelines and science.

Transparency is essential to building trust among stakeholders and the general public. Transparency can prevent unnecessary delays, legal actions or bad press. Openness during energy development enables fish and wildlife management that benefits all stakeholders, not just project proponents. TRCP recommends that you:

- Identify “special places” with exceptional resource concerns or values where energy development should not be allowed. Map these locations and incorporate these values into management plans.
- Provide up-to-date information through a range of media and informational outlets to the public and fish and wildlife managers regarding energy development projects.

- Direct and manage leasing and development using complete and up-to-date baseline information on fish and wildlife resources.
- Utilize coordinated plans for energy development and fish and wildlife management.
- Provide the public with information about all proposed public-lands energy leases and development; allow sufficient time for public comment.
- Ensure that all meetings related to public-lands use and energy development become part of the public record.

Science is the foundation of sustainable land and resource management. It is essential to understanding how fish and wildlife react to energy development and maintaining sustainable populations during and after development. Utilizing peer reviewed and published science enables a balanced approach that sustains both energy AND fish and wildlife instead of either energy OR fish and wildlife. TRCP recommends that you:

- Utilize science, including the most current published science in all fish and wildlife decisions, particularly when specific research has been conducted on the impacts of energy development. Assure that mitigation and monitoring based on new scientific information is implemented in the energy development process.
- Incorporate science-based mitigation, using tested and proven methods of adaptive management when making decisions about fish and wildlife management and energy development. Identify and address “gaps” in science prior to development and implement coordinated research to address these gaps.
- If necessary, utilize a third-party review of development and mitigation proposals.
- Establish a credible and qualified “science review team” and engage science-based organizations for fish and wildlife management and development decisions.
- Establish a process to incorporate new information and science into planning and implementation of existing and new energy projects.

The TRCP supports and promotes responsible energy development which balances land and resource values that sustain fish and wildlife populations while maintaining opportunities for hunting and fishing. Once again, TRCP appreciates the opportunity to provide scoping comments and looks forward to working with you and the Pinedale BLM Field Office as you move forward with your Resource Management Plan revision.

Sincerely,



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