

CSU with 4-mile radius of a lek - UNWARRANTED

Our refined proposal is to retain the current 2-mile radius around **occupied** leks. To date, no scientific justification has been provided that demonstrates the current 2-mile radius is insufficient or is harming nesting sage grouse. We also recommend that timing restrictions within 2 miles of an occupied lek be limited to “severe winter relief habitat.”

Supporting Data: NEPA requires the BLM to analyze existing data available in the public domain and to consider all science on the subject.

The WAFWA 2004 report states that Braun et al. 1977 indicated that most hens nest within 2 miles of a lek. It is also stated that sagebrush habitats are generally abundant in areas inhabited by sage-grouse and, during most winters, are not in short supply or limiting to sage-grouse populations.

Bradbury et al. 1989 and Wakkinen et al. 1992 indicate that 70-80% of all nests often occur within 2-miles of an active lek.

It also stated in Hausleitner 2003 that the average distance between a female’s nest and the lek where she was captured was 2.5 miles for Colorado.

The unpublished Hausleitner 2003, A.D. Apa unpublished data indicates 76% of nests are within 4-mile radius. The same study suggests that the sage grouse population in NW CO is increasing, suggesting that the current 2-mile radius is sufficient.

Opposing Data: After numerous requests for data, nothing has been shared.

Other areas where this idea has been successfully implemented: Nowhere has a 4-mile CSU nesting sage grouse stipulation been applied that we know about.

New prairie dog stipulations - UNWARRANTED

The BLM considered and rejected a prairie dog ACEC but created this new stipulation. Moreover, BLM has not provided any supporting science to justify the new stipulation.

Supporting Data: Comments of Julander Energy Company on the nomination of the Little Snake White-Tailed Prairie Dog Complex as an ACEC which is located on the NWCOS website: <http://nwcoss.org/Resources/RMP%20Comments/JEC%20Little%20Snake%20comments%20ACEC%20052705.pdf>

From page 10 *“In this case, oil and gas exploration does not damage or endanger the white-tailed prairie dog, and in fact provides favorable habitat for the development of existing and future white-tailed prairie dog complexes. There are numerous examples of the positive relationship between oil and gas development and white-tailed prairie dog such as that described in the 1986 report by Mariah Associates in “Black Footed Ferret Survey of the Rangeley Oil Field” prepared for Chevron USA. Information obtained from Ed Holloway and BLM’s files in Rangeley. This 40-year old oil field was undergoing activities associated with enhancing the recovery of oil and was surveyed for ferrets and their habitat (white-tailed prairie dogs) in anticipation of additional well drilling and pipeline construction. The report states, “during the study the survey crew noted that prairie dog burrows were often more numerous along existing pipeline or cable rights of way or other disturbed areas than in surrounding undisturbed area. During the last field season, the location of pipelines where burrows were noticeably more dense than in the surrounding area were mapped.”*

The comments continue citing numerous EAs from BLM biologist Ed Holloway that state the breaking of heavy soils and clay pans from earth work apparently aids prairie dog burrowing and is not uncommon in the Rangeley Field.

Opposing Data: No scientific data has been provided that suggests oil and gas activity requires this new stipulation.

Other areas where this idea has been successfully implemented: Nowhere has this prairie dog stipulation been applied that we know about.

Year-Round Drilling - WARRANTED

Year round drilling should be discussed in the RMP document and criteria that would allow to year round drilling take place should be specified. This is not criteria for granting exception, modification or wavier.

Supporting Data: Questar’s proposal to allow year-round drilling on the Pinedale Anticline is an example of the wildlife benefits to such a program. It would allow the possibility for companies to obtain a drilling rig for the planning area without negatively impacting the environment. Wyoming Game and Fish has worked closely with companies to balance the needs of wildlife and energy development year round.

Opposing Data:

Other areas where this idea has been successfully implemented: Pinedale, Wyoming.