

Clait E Braun, Ph.D Comments on BLM's Draft EIS

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FINAL

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To Whom It May Concern:

This letter represents my professional judgment based on my involvement in research and management studies on sage-grouse from 1973 to the present. I have extensively reviewed the DEIS for the Powder River Basin Oil and Gas Project (Wyoming portion only). My comments primary relate to sage-grouse and their habitats.

1. The material specific to sage-grouse (2-74, 3-101 & 3-102, 4-177, 4-188, 4-197, 4-296, 5-10, 5-15, 5-16, 5-29, 5-33) is inadequate in scope, it is not current, and misrepresents what is known. No reference is made to the major scientific papers on sage-grouse as summarized by Connelly et al. (2000) and Schroeder et al. (1999).
2. The preferred alternative barely mentions probable impacts on sage-grouse other than in Table 2-42. The language used "may occur" and "may result," begs the question. Clearly CBM development as proposed will have major negative impacts on sage-grouse throughout the impacted area. Numbers are lower now, with limited development, than in adjacent areas not yet affected by CBM activities (Braun et al. 2002, In Press).
3. The entire discussion of indirect and cumulative effects of CBM development on sage-grouse is inadequate. Clearly the addition of power lines, compressor stations, blading of vegetation, release of water on the surface, roads, etc. will negatively affect sage-grouse.
4. The area used by sage-grouse that will be impacted is underestimated. Most of the area developed will be highly fragmented by roads, trails, pipelines, power lines, compressor stations, etc. This will fragment the useable habitat into small pieces, as small as 40-60 acres, which will make them unusable to sage-grouse for all life processes. Further, it will increase the effectiveness of predators by making habitat patches easier to search and access. One can only conclude that all of the area within 1-2 miles of compressor stations and active disturbances such as periodic well servicing

will be made unusable through much of the breeding period. Without successful breeding, populations cannot be sustained over time.

5. The discussion of the impacts of water disposal on habitats useful to sage-grouse is inadequate. Release of water can have negative impacts on sagebrush as too much water can kill sagebrush and highly alkaline water can increase soil salinity changing the habitat from being dominated by sagebrush to that of being dominated by greasewood and saltbush and salt tolerant grasses and forbs. Both consequences will be extremely negative for sage-grouse and will make areas affected unusable for the species.
6. There is almost no discussion of mitigation for habitat loss or direct impacts of CBM development on sage-grouse. Such losses can reasonably be expected but are essentially discounted as if sage-grouse are unimportant.
7. The scientific literature on sage-grouse is not explored, cited, or mentioned anywhere. There are numerous scientific studies (summarized by Connelly et al 2000) on the importance of winter-use areas, distances where disturbances should be avoided, etc. This is one of the major faults of the DEIS.
8. The DEIS uses minimal distances such as one-quarter mile for no disturbance during the breeding season. This "magic" number has been created by the BLM without any scientific basis and contradicts published Guidelines dating to 1977 (Braun et al. 1977) and more recently (Connelly et al. 2000). Further, the BLM has publicly accepted the published Guidelines and has promoted use of selected recommendations. This selective use of the published literature has been done despite clear evidence that sage-grouse are negatively impacted by disturbance activities.

In summary, the DEIS treatment of sage-grouse is shallow, it does not explore predictable indirect and cumulative effects, review and citation of current literature is almost non-existent, examination of the magnitude of effects of changes in habitat on sage-grouse is non-existent, and no serious mitigation plans were considered out side of use of minimal distances (and short time limitations) from active lek sites. Further, in most situations, "the authorized officer may authorize exceptions to the time and distance limitations, in any particular year" suggesting that no protection will be given to sage-grouse breeding and nesting areas. Winter-use areas are not even mentioned! Finally, the commonly used statement that CBM development "would have minimal effects on the sage grouse" is without merit and is commonly known to be inaccurate and misleading.

Respectfully,

Clait E. Braun, Ph.D.
Grouse Inc.