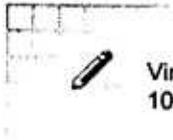


6-14



Virginia Stephens  
10/01/2001 05:41:57 PM

Record Type: Record

To: Andrea Sarzynski/WHO/EOP@EOP  
cc:  
Subject: Recommendations for Task Force actions

----- Forwarded by Virginia Stephens/CEQ/EOP on 10/01/2001 05:44 PM -----



"Kathryn B. Reis" <reiskath@yahoo.com>  
10/01/2001 04:55:42 PM

Record Type: Record

To: Edward A. Boling Energy Task Force/CEQ/EOP@EOP  
cc: tom@wildlife.org  
Subject: Recommendations for Task Force actions

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Dear Chairman for Council on Environmental Quality,

I am writing you on behalf of The Wildlife Society (TWS), which is a professional organization of 8,500 wildlife biologists. In July 2001, Tom Franklin, the Society's Wildlife Policy Director, and I met with John Howard, Bill Leary and Edward Boling of the Council on Environmental Quality to discuss the impacts of energy development on wildlife resources. Below are our formal comments regarding Executive Order 13212--Actions to Expedite Energy-Related Projects. Some of our suggestions may be more applicable to the permitting process than Task Force activities; however, we present them now to emphasize the value of wildlife management on developed lands.

I. What priorities should the Task Force consider when helping the Federal agencies expedite the permitting process?

A. TWS members believe it is imperative that the biological needs of wildlife species, including those that the U.S. Fish and Wildlife Service and state wildlife agencies recognize as common or declining, receive prominent consideration during the permitting process. Thus, the Task Force and pertinent Federal agencies should consider the impacts of energy development on wildlife resources, such as breeding success among common and listed species, wildlife movement for foraging and seasonal purposes, and quality of protective cover and forage for

wildlife.

B. While TWS members understand that energy development must occur we also know that careful land management planning is mandatory if minimal impacts on wildlife resources are to occur.

Thus, we ask the Task Force and Federal agencies to describe how the identified impacts on wildlife could be mitigated, if not avoided. Furthermore, the Task Force should explore the value of coupling Adaptive Resource Management (ARM) with energy development. ARM is a process by which scientists and land managers simultaneously collect information about wildlife resources and manipulate wildlife habitat. If implemented, Federal agencies could use developed lands as a living laboratory for inventorying and monitoring biological resources and perhaps identify ways in which wildlife conservation and energy development can co-exist.

C. Presently no standardized techniques exist for "environmentally responsible" development of oil, gas and coalbed methane. The Wildlife Society encourages the Task Force and Federal agencies to develop standardized techniques (that is, beyond ice pad use and directional drilling) that ALL energy development companies must use. Such techniques would make it easier for wildlife conservationists and biologists within the Bureau of Land Management (BLM) to evaluate a project's level of impact on wildlife resources and to compare the level of impacts on wildlife among numerous projects.

## II. What are the staffing/resource needs for Federal agencies?

A. District offices of the BLM need additional funds to hire more biologists who can conduct the NEPA process. Additional biologists are also needed to conduct biological inventorying and monitoring on developed lands before, during and after a project's implementation. That data is needed for wildlife resource management, especially if the Task Force and Federal agencies incorporate ARM into the energy development process.

## III. What techniques should be used to facilitate issue resolution?

A. Clearly energy development is a polarized topic among Americans. TWS believes it is necessary that wildlife conservationists (e.g., members of TWS, Wildlife Management Institute and Izzak Walton League of America) and representatives of the energy industry unite for a facilitated discussion about energy development. Whereas the energy industry would benefit from learning what the biological concerns are of wildlife conservationists, the wildlifers would benefit from learning what real and/or perceived fears the energy industry has about development restrictions. If common ground is to be sought among these interest groups, whether or not those agreements lead to legislative directives, these interest groups need to understand each others needs and fears.

## IV. How can Federal agencies identify achievements during the

permitting process?

A. From TWS's perspective, the permitting process is successful if it promotes serious and relatively thorough consideration of the proposed project's potential impacts on wildlife resources and if the projects' stakeholders agree about how they will mitigate for those impacts.

V. What type of individual should be a member of the eight-member working group within the Energy Task Force? Working group members would manage and coordinate the Task Force's activities?

A. We encourage you to make at least one wildlife biologist a member of the working group. For instance, Chris Jauhola who is the BLM's Fish, Wildlife & Forest's Group Manager, would be a valuable team player because she is already aware of the biological concerns linked to energy development.

VI. Do you have suggestions for how to streamline the permitting process?

A. Although TWS does not have suggestions for how to streamline the permitting process, we do urge you to not revoke the level of federal oversight that currently exists for the permitting process. If states receive more authority during the permitting process, it is possible that wildlife interests will not receive equal consideration as would the state's economic and energy needs. It is the opinion of TWS members that federal oversight is necessary to ensure economic, energy and wildlife matters receive equal consideration. Lastly, we also urge the Task Force to not let a permit receive automatic approval if the review process is not completed by the designated deadline. In our opinion, a missed deadline implies that the biological, economic and energy concerns of the proposed project are more complex than initially anticipated, especially if the district BLM office is adequately staffed.

Thank you for letting The Wildlife Society comment on Executive Order 13212. If you have questions concerning our recommendations, please contact either Tom Franklin at 301-897-9770 or myself at 202-371-1808.

Sincerely,  
Kathryn B. Reis  
Associate Certified Wildlife Biologist  
The Wildlife Society

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Friendship is certainly the finest balm.  
...Jane Austen

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