



American Fisheries Society

Western Division

February 23, 2003

Mr. Paul Beels
Bureau of Land Management
1425 Fort Street
Buffalo, WY 82834-2436

Dear Mr. Beels:

The American Fisheries Society was established in 1870 and is the country's oldest and largest organization of professional fisheries biologists and scientists. The Western Division of the American Fisheries Society (WD) was established in 1948 and includes 13 State and Provincial Chapters throughout the western U.S. and Canada with some 3,700 members.

Occasionally the WD comments on regional fisheries issues deemed important and relevant to Division members. In this case, the decision to do so was driven by previous comments from the Montana and Colorado-Wyoming Chapters regarding draft documents pertaining to coal bed methane (CBM) development in the Powder River basin, and subsequent discussions between WD and Chapter officers about coal bed methane (CBM) development in the West. The regional nature of current and potential CBM development, the general paucity of specific information about the many fish species, habitats, and ecosystems potentially affected by large-scale CBM development, and a perception that aquatic resource issues deserve greater attention, all prompted the decision to coordinate a larger WD involvement.

Comments from the WD on the Final Environmental Impact Statement and Proposed Plan Amendment for the Powder River Basin Oil and Gas Project (FEIS) issued by your agency are attached. These comments were prepared according to Western Division by-laws and several steps were taken to ensure that comments were science-based, meaningful, and consistent with WD by-laws. Our Environmental Concerns Committee solicited reviews from expert members throughout the WD, WD officers and the Policy Review Committee provided oversight of the commenting process and deemed it appropriate, and all WD officers had an opportunity to review the comments.

While the following comments are specific to CBM development in the Powder River basin in Wyoming, they are generally applicable to proposed CBM developments in the Powder River and Tongue River basins in Montana, and almost certainly elsewhere. They are derived from the collective diversity and expertise of Western Division members and based on an intimate, and arguably unparalleled, familiarity with fisheries resource issues across the West. While it would be disingenuous to imply that these comments represent all possible views or perspectives among WD members regarding CBM development, individuals well versed with the technical and biological issues presented in the FEIS have prepared them. I am satisfied they have provided legitimate, technically sound, scientifically based, and constructive comments on this important document.

Our comments generally focus on several elements of the FEIS that deserve additional attention as CBM development progresses. Important questions remain about water quality and risk assessment to aquatic biota, the adequacy of NPDES permitting requirements, and implementation of an effective monitoring, mitigation, and adaptive management process.

In light of limited information about aquatic habitats and their biota, relationships between produced water and aquatic environments, and the certainty that new information will become available as development and monitoring occur, I commend and support implementation of an effective adaptive management element so critical to responsible mitigation and environmentally sound development of CBM resources.

Because the WD is not formally protesting the FEIS, it is understood that BLM is not obligated to accept or respond to these comments. However, the Mitigation, Monitoring and Reporting Planning Process Implementation plan described in Appendix D implies commitment to an adaptive management approach for CBM development, and I remain optimistic our comments will be considered fully by decision and policy makers as CBM development occurs.

Thank you for considering these matters and please feel free to contact me if our organization and it's collective expertise can assist with future analyses, evaluations, or understanding of the relationships between CBM development and aquatic resources.

Sincerely,

A handwritten signature in purple ink, appearing to read 'Don MacDonald', with a long horizontal line extending to the right.

Don MacDonald, President
Western Division American Fisheries Society
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Nanaimo, BC V9T 1W6
Canada

Cc: Mr. Bob Bennet, Wyoming State Director, BLM
Ms. Jodi Bush, Wyoming Acting Field Supervisor, USFWS
Mr. Robert Roberts, Regional Administrator, EPA Region 8

Ec: Mr. Paul Beels, Buffalo Field Office, BLM
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Western Division Chapter Presidents
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