25 July 2013

To the Vernal Field Office of the Bureau of Land Management:

Thank you for the opportunity to provide input on the public scoping period for the Rights of Way application for Enefit American Oil’s Utility Corridor Project. HawkWatch International is a non-profit conservation science organization located in Salt Lake City that specializes in birds of prey. HawkWatch International has done extensive work with the BLM offices in Eastern Utah and Western Colorado involving raptor responses to oil and gas development (see BLM Technical Notes 432-436; http://www.blm.gov/nstc/library/techno2.htm). We have suggestions for additional topics to be included in the EIS document.

In addition to the environmental issues outlined in the newsletter, we urge the BLM to conduct a thorough investigation of the impacts of these utility corridors on raptors, with special focus on Golden Eagles, a species of increasing conservation concern at the state and federal level. With this information, Enefit and BLM will be able to better assess risk to raptor populations from construction of corridors due to loss of foraging habitat, vehicle, powerline or tower collision and electrocution (and subsequent associated power outages due to electrocution events). There exists a group of historical Golden Eagle nests within approximately 1.8 miles of the proposed corridor, which is well within the extent of a Golden Eagle home range (1.6 to 2.0 mile radius; Marzluff 1997, Kochert et al 2002, Slater et al 2012). Additionally, there are several Red-tailed Hawk nests that occur directly on the proposed right of way. Given that our records for nesting date back to 2006 at the very latest, we encourage a thorough survey of potential raptor habitat within 2 miles of the proposed corridors, including nesting (approximately February through July) and over-wintering seasons (November through March).

In addition to assessing risk from construction projects, by understanding how raptors use the landscape within proximity of the project, the BLM and Enefit will be able to manage effects of raptors and corvids on sensitive prey base species, such as the Greater Sage-grouse (Centrocercus urophasianus; Coates 2007). Erecting power poles provides perching and nesting substrate for raptors and ravens, often increasing their population rapidly in areas with historically lower densities (Engel 1992, Steenhof 1993). This is problematic because ravens are known predators of greater sage-grouse, one of the listed issues that the BLM will be addressing in the EIS. Power line structures may also unnaturally concentrate raptors (APLIC 2006) to the potential detriment of prey species.
We strongly suggest that the BLM and Enefit create appropriate protocols for construction of these corridor projects and follow closely with USFWS-accepted guidelines for development and operation of utility corridors. These protocols should include ways to minimize disturbance to nesting raptors (see: Romin and Muck 2002) and construction of raptor-safe electrical distribution lines (See: APLIC 2006). In addition to minimizing direct disturbance to raptors, we suggest analyzing potential loss of habitat for prey-base (e.g. open shrublands) from any proposed actions. In addition to constructing raptor-safe distribution lines, we also urge the BLM to consider managing perching corvids and raptors through perch deterrents or use of single-pole structures when appropriate, and creating protocols for construction to avoid attracting ravens (e.g. removal of trash, no standing water).

Please feel free to contact us with any questions you may have about our suggestions. We thank you for the opportunity to share our insights, and hope that they may be given due consideration when preparing the EIS for the proposed project.

Sincerely,

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Literature cited:


