



UTAH STATE OFFICE  
STATE DIRECTOR'S OFFICE

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Utah Trout Unlimited  
2348 Lynwood Dr.  
Salt Lake City, UT 84109  
(801) 467-3862  
July 29, 2005

Sally Wisely  
Utah State Director  
Bureau of Land Management  
P.O. Box 45155  
Salt Lake City, UT 84145-0155

Re: Notice of Competitive Lease Sale Oil and Gas - Uinta National Forest,  
Utah Parcels (UT 0805) 313 through 326

Dear Director Wisely,

Under regulation 43 CFR 3120.1-3 the Utah Council, Trout Unlimited (UTU) protests the above referenced leases.

UTU has been heavily involved in stream restoration efforts in the Strawberry and Diamond Fork watersheds for over 10 years. Our involvement includes stream restoration work on the Indian Creek Drainage, in-stream egg incubation projects and stream restoration on Trout Creek, participation on the Friends of Strawberry Valley (a citizen support organization), working with the Utah Division of Wildlife Resources on restoration projects, and direct involvement with the Central Utah Project Mitigation Commission on Strawberry Valley enhancement work. In addition, as a participant on the Utah Blue Ribbon Fisheries Advisory Council, we are closely involved in maintaining the quality of the Strawberry Reservoir and Diamond Fork and Sixth Water Blue Ribbon Fisheries. Our members have fished these waters for well over 20 years.

The Record of Decision, Strawberry Valley Management Area Final Environmental Impact Statement, specifically states that the Selected Alternative provides the highest standard of resource management. This Alternative "provided the greatest protection to the three (3) million dollar investment for rehabilitation of the area and the two (2) million dollar investment to reduce non-game fish populations". Also, the selected Alternative placed major emphasis on renewable resources and stated "Resources management decisions would emphasize watershed, fish, and wildlife values over other uses".

In addition to the above mentioned five (5) million dollars, there have been several other expenditures aimed at restoring the Strawberry Reservoir fishery:

- \* A payment to the Strawberry Water Users Association of approximately seventeen (17) million dollars to compensate that organization for the removal of grazing on Strawberry Project Lands.

- \* Ten (10) million dollars to remove the Daniels Irrigation company Upper Strawberry River diversion. The purpose of this was to restore natural flows in the river to increase natural reproduction.

- \* Approximately five (5) million dollars to meet mitigation requirements of the Central Utah Project.

- \* Five hundred thousand dollars for a Strawberry Valley Assessment (USFS)

The Strawberry Reservoir is the highest utilized fishery in the State of Utah and is one of the United States Forest Service' (USFS) premier flat water fisheries. The above detailed summary of expenditures, approximately thirty seven (37) million dollars, underscores the importance of these watersheds and the Strawberry Reservoir.

In addition, over three (3) million dollars have been programmed by the CUP Mitigation Commission for protection and rehabilitation of the Sixth Water and Diamond Fork Drainages.

There has been a clear understanding among Federal and State agencies and the public that the Strawberry and Diamond Fork watersheds have an extremely high recreational/economic value. The Strawberry Reservoir alone experiences 1.7 million hours of fishing each year which generates approximately (20) million dollars for the State of Utah.

In addition to the recreational importance of these watersheds, municipal water from the Strawberry Reservoir will be delivered to many municipalities in Utah and Salt Lake Counties. It is extremely important that this water supply is maintained at its current, high, level of water quality.

Leasing these areas for oil and gas exploration and production will, almost certainly, have a serious, adverse impact on this very important resource. In order to protect the recreational and water quality values of these watersheds, the Forest Service must follow its guidelines (Forest Plan 2003) and conduct site specific analysis of any proposed oil and gas exploration/production activities. The 2003 Revised Uinta National Forest Plan states:

“Alternative H includes opportunities that will allow mineral activities to occur, especially areas for leasing oil and gas and other leasables. *More site-specific analysis by the Forest line officer will be required at the time proposals are received.*” (Volume 1 FEIS, 3-107) (emphasis added).

Thus, the Forest Service's own guidelines require that a site specific analysis be conducted *before* leasing occurs. That policy makes sense insofar as leasing these parcels conveys a property right that allows the lessee to explore for and develop gas and/or oil reserves. Once that right is conveyed, it becomes much more difficult to take full and fair account of the wildlife, recreation, clean water, and other values that will be impaired by the exercise of that right.

We recognize the need to develop domestic sources of energy and that resource development is an appropriate activity on public lands. Development decisions, however, cannot be made in a blind rush to lease as much land as possible, and the potential economic benefits of exploration and drilling must be weighed carefully against the potential detriment to other public uses. In this instance, we find it inconceivable that the benefits of exploration and drilling on these parcels could outweigh the potential harms of those activities on (1) the combined value of federal, state and private money already invested in protecting and enhancing recreational uses, (2) the future economic and recreational benefits provided by these areas to our members and all citizens of the State, (3) the vital habitat for fish and wildlife that these areas provide, and (4) an important source of clean drinking water for all citizens who live along the Wasatch Front.

For all these reasons, we must protest the decision of the BLM and Forest Service to lease these parcels for oil and gas exploration and development.

We appreciate the opportunity to comment on this proposed lease sale and would welcome the opportunity to meet with you and discuss these objections in greater detail.

Sincerely,



Paul F. Dremann

Vice President, Conservation  
Utah Council, Trout Unlimited

Attachment:

Cc: UTU Exec. Comm.  
Jon Huntsman Jr., Governor State of Utah  
Kent Hoffman, Deputy State Director BLM  
Jack Troyer, Regional Forester USDA  
Pete Karp, Supervisor, Uinta National Forest  
Julie King, District Ranger, Heber Ranger District  
Bill Ott, District Ranger, Spanish Fork District  
Wasatch County Commission  
Utah County Commission