

# MARYLAND ORNITHOLOGICAL SOCIETY, INC.



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DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

2008 NOV 14 AM 10:00  
RECEIVED  
CHEYENNE, WYOMING

Robert Bennett, State Director  
Bureau of Land Management  
5353 Yellowstone Road  
Cheyenne, WY 82003

11/14/08

SD	RP&M
ASD	M&LA
TLA	DSS
CEO	CF
LAW	LEAD Resp.

Dear Mr. Bennett:

The Maryland Ornithological Society protests proposed leases for parcels 184, 185, 193, 196 in the Jack Morrow Hills and 177-183 and 186-192 in the Little Mountain area. We believe the federal lands managed by the BLM aren't only about extractive industries; consideration of total value to the National interest must be part of any decision regarding permanent change of the landscape.

MOS is a statewide nonprofit organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 2,000 members. MOS members travel to federal lands throughout the West, including Wyoming, on birding and nature-watching vacations. We spend money on food, lodging, guide services, books, and souvenirs to support the local economy wherever we go.

### Jack Morrow Hills

The proposed leases in the Jack Morrow Hills are in prime nesting habitat for the declining Greater Sage-Grouse. These hills have been designated as core areas in Wyoming Governor Freudenthal's Greater Sage-Grouse conservation strategy. We believe that the BLM should follow the Governor's lead and protect core breeding range for the Sage Grouse, a species long revered by Native Americans, birders, and other wildlife enthusiasts.

### Little Mountain

The Little Mountain area has been identified as a Bird Habitat Conservation Area under the Intermountain Joint Venture, a collaborative group including state and federal officials, scientists, and conservation advocacy groups. Little Mountain provides habitat for both migratory and permanent resident bird species dependent on junipers, such as Western Scrub Jay, Juniper Titmouse, Bushtit, and Scott's Oriole.

The Colorado River cutthroat trout also occurs in the Little Mountain area in Curry Creek. Petitions have been filed with the U.S. Fish and Wildlife Service to have the trout listed under the Endangered Species Act, because it has lost 95% of its historic

range. Roadless areas, which by definition exclude oil and gas development, are crucial to this subspecies' survival.

Little Mountain also provides crucial habitat for elk, mule deer, and pronghorn antelope. It is, hence, a popular hunting and wildlife viewing area for Sweetwater County, and has been designated by BLM's own resource management plan as a highly significant resource area that should be protected.

### **Economic Impact**

In addition to the economic boost provided by birders and other outdoor recreationists, both areas are prime elk habitat and are important elk hunting destinations. This economic resource would be jeopardized by oil and gas development. Also, over \$2.25 million of private, state, and federal funds invested in habitat since 1990 would be jeopardized, and potentially wasted by oil and gas development.

### **Conclusion**

*These areas should not be leased for oil and gas development. The environmental toll on declining species such as the Colorado River cutthroat trout and Greater Sage-Grouse should be sufficient reason. Opposition from the Wyoming Governor should also give pause. Lastly, the ecotourism and hunting economies would be negatively impacted. The Maryland Ornithological Society urges you to withdraw these parcels from potential oil and gas leases.*

Sincerely,



Kurt R. Schwarz  
Conservation Chair  
Maryland Ornithological Society