



THE WILDERNESS SOCIETY

Northern Rockies Regional Office

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March 25, 2009

Don Simpson, State Director
Bureau of Land Management
5353 Yellowstone Road
P.O. Box 1828
Cheyenne, WY 82003

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Dear State Director Simpson,

We are writing to express our strong concerns with 17 of the 101 parcels being offered for lease in the BLM Rawlins, Rock Springs, Cody, and Worland Field Offices in the April 2009 sale. These parcels, just 14,500 acres out of the 98,195 total acres up for lease, fall within citizens proposed wilderness areas, have roadless characteristics, contain valuable wildlife habitat, and have unparalleled scenic resources.

Most of the BLM lands in Wyoming are already leased for energy development with more leased every two months. In Wyoming there are approximately 41 million acres of federal mineral estate (including national parks, refuges, forests, etc) and almost 28 million of that is available for leasing with approximately 13.5 million acres already leased. With almost 100,000 acres being offered for lease in the upcoming April auction, we emphasize that over 83,000 acres of public land would still be up for sale even if you were to withdraw the 17 parcels of concern.

Many of the parcels that we feel should be withdrawn from the lease auction lie within the Adobe Town/Kinney Rim area. Lease parcels WY-0904-045 through -052 are partially located in the Adobe Town Citizens Proposed Wilderness Area or are adjacent to the Adobe Town WSA. Not only are these parcels (totaling 3,200 acres) partially within the Citizen's proposed Wilderness of Adobe Town and the area that Wyoming has formally designated "Very Rare or Uncommon," they are within an area that Sweetwater county has passed a resolution to protect. Some of these parcels, primarily 46, 47, and 48, are adjacent to the Adobe town WSA as well.

Lease parcels 057 and 058 are located within the Kinney Rim South Citizens Proposed Wilderness Area. Lease parcels 70 and 72 are located in the Kinney Rim North Citizens Proposed Wilderness Area. In addition, parcels 60 and 71 are partially within the citizens proposed Wilderness for the Kinney Rim area. These parcels should be pulled now and potentially reconfigured to avoid any citizen proposed wilderness.

Adobe Town and the Kinney Rim area are recognized throughout Wyoming as special places where individuals can go to hunt, hike, and explore. It is places such as these that form the backbone of Wyoming's outdoor-recreation based culture and way of life.

Lease parcel 067 (1,590 acres) lies entirely within the Citizens Proposed Wilderness Area for the McCullough Peaks. This area is highly valued for its scenic badlands and wildlife. Many people from Cody, Powell, and other surrounding communities, recreate in this area year-round. The WSA and adjacent CWP make up the core of the McCullough Peaks area and should not be subject to the threat of industrialization. In addition, the BLM is in the process of reanalyzing its management plan for the Cody Resource Area (including revisiting what areas are recommended for wilderness) as part of its Bighorn RMP revision. The BLM should not be foreclosing options relating to possible expansion of existing WSA or recommending Wilderness in McCullough Peaks as part of the new Bighorn RMP by leasing it at this time. At the very least, the BLM should defer any new leasing here until after the Draft plan and EIS with the preferred alternative is released.

Lease parcel 073 (1,163 acres) is located within the Worland field office. Wyoming Game and Fish is strongly opposed to leasing this parcel, regardless of the number of stipulations placed upon the lease. This area is of critical importance to many wildlife species and supports high hunter numbers each fall. The BLM has spent the last 6 years carrying out habitat restoration projects in this area, an effort that will become worthless if this parcel were to be developed.

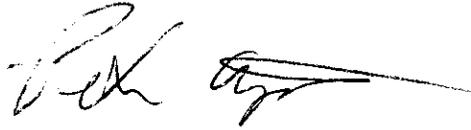
Wyoming has done more than its share to support the nation's energy needs and industry has no shortage of available acreage for potential new oil and gas exploration. As you are aware, the leasing process is the best time to identify whether or not certain lands are truly suited for development. Once leased, BLM, other agencies, and private citizens are limited in what they can do to protect wilderness, wildlife, recreation or other values found on a specific parcel of land. Thus in certain cases it is in the public's best interest for the BLM to be prudent and not lease the parcel. These 17 parcels meet this test for they are wilderness-level quality, are unroaded, and/or provide such crucial habitat for wildlife that the best recourse for the BLM is to withdraw these parcels from the sale. No amount of stipulations would effectively protect their values.

Finally, on February 13, 2009 then-BLM-acting-director Ron Wenker sent a memorandum to all BLM State Directors. In this memorandum the State Offices of the BLM are directed to provide briefing papers to the Washington office regarding potential controversies or issues associated with upcoming parcels proposed for lease. If any protests are filed after submittal of the initial briefing papers then the BLM is to update these briefing papers. This briefing must contain an analysis of several issues and the controversies surrounding them, including whether the parcels are located in citizen proposed wilderness areas (CWP), whether the parcels involve species listed under the Endangered Species Act or BLM-sensitive species, and whether the parcels have roadless characteristics. These are all issues present in the 17 parcels we are protesting. Leasing these parcels would appear to be out of compliance with the intent of this memo and the new direction established by the national BLM office.

We urge you to withdraw parcels 45, 46, 47, 48, 49, 50, 51, 52, 57, 58, 60, 62, 67, 70, 71, 72, and 73 from the April auction in order to protect some of Wyoming's wild lands from the threat of development and preserve them for future generations.

Thank you for your consideration of our request and we eagerly await your reply.

Sincerely,



Peter Aengst
Northern Rockies Deputy Director
The Wilderness Society

ON BEHALF OF

Hilary Eisen
Public Lands Advocate
Greater Yellowstone Coalition

Bruce Pendery
Staff Attorney
Wyoming Outdoor Council\

Erik Molvar
Executive Director
Biodiversity Conservation Alliance

Marshall Dominick
President
Friends of a Legacy (FOAL)

cc: Wyoming Governor Dave Freudenthal
Secretary of the Interior Ken Salazar
Deputy Secretary of Interior David Hayes
BLM Acting Director Mike Pool