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To:

From: Dwayne Meadows's
Name Greater Little MIT Coalition

Name Don Simpson, State Dir

Company _____

Company BLM

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Comments _____



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Via Facsimile 307-775-6203

Don Simpson, State Director
Bureau of Land Management (BLM)
Wyoming State Office
5353 Yellowstone Road
Cheyenne, Wyoming 82003-1828

Re: Protest of August 4, 2009 Competitive Oil and Gas Lease Sale

Parcels WY-0908-046,

Dear Director Simpson:

The Greater Little Mountain Coalition (GLMC) is an informal coalition of local citizens, statewide and national conservation organizations, and religious and labor organizations that include more than 200 local citizens of Sweetwater County, Wyoming. All of these organizations are concerned for the long-term viability of wildlife, fisheries and outdoor recreation within the Greater Little Mountain Area. The Greater Little Mountain Area is a region of Sweetwater County, WY that includes the boundaries of Wyoming Game and Fish Deer Hunt Area 102. GLMC is working hard to ensure that energy development on public lands is balanced with the needs of fish and wildlife resources, but is concerned that the rapid pace of development is precluding BLM from managing these resources as required by the Federal Land Policy and Management Act.

Offering the protested parcel for lease at this time would be contrary to both Federal law and the policy of the State of Wyoming. Because no separate environmental analysis has been undertaken or completed for the effects of the proposed lease sale, the BLM's leasing decision relies on planning and NEPA documents, of which don't address pertinent and significant new information regarding effects of oil and gas development on wildlife, particularly greater sage-grouse and mule deer.

The parcel WY-0908-046 is within a mile of a previously offered parcel WY-0906-076 that was deferred from the June Wyoming BLM Competitive Oil and Gas Lease Sale. The BLM deferred the parcel because: "BLM will defer parcel WY-0906-076 until the State and Federal government reviews and determines a strategy for development in the Little Mountain Ecosystem." As of the time of posting the protested parcel (WY-0908-046) for sale on June 19, 2009, no known "strategy for development in the Little Mountain Ecosystem" had been established by the BLM or the State. In the order of consistency with the BLM's own language the parcel in question should be deferred until a "strategy for development in the Little Mountain Ecosystem is established."

DESCRIPTION OF AFFECTED RESOURCES

Greater Sage-Grouse Leks and Occupied Habitat:

According to BLM Competitive Lease Sale notice data and analysis of sage grouse density data by the Wyoming Game and Fish Department, the parcel falls within occupied greater sage-grouse habitat (nesting and/or winter habitat) and is of particular concern for grouse population viability due to proximity of lease sale parcel to areas of high sage-grouse lek density. The parcel is subject to timing limitation stipulations which restrict (subject to site-specific exceptions) the timing of initial drilling operations, restricting surface use (excluding "operation and maintenance of production facilities") from March 15 through July 15 to protect nesting sage grouse and from November 15 through March 14 to protect wintering sage-grouse. Unfortunately, these standard stipulations have been repeatedly demonstrated through scientific studies to be ineffective in protecting greater sage-grouse leks and nesting success, are not supported by any peer-reviewed scientific studies, and reliance solely on these timing stipulations is inconsistent with the conservation strategies identified in the recommendations of the Wyoming Sage-Grouse Implementation Team

We request the BLM modify or defer the leasing of specified parcels within greater sage-grouse core area habitat that would be affected by the proposed lease sale. Because mapping and planning efforts to document and protect this species are currently incomplete, the BLM should refrain from issuing leases that will complicate conservation efforts until such time as it has adequately addressed newly-available scientific and conservation policy data and recommendations.

Big Game Crucial Range and Migration

According to the BLM Competitive Oil and Gas Lease Sale Notice data and our review of mule deer and pronghorn range data from WGFD, the parcel listed above falls within or adjacent to elk, mule deer, and pronghorn migration routes and crucial ranges of particular importance for wildlife populations. BLM has specified for this parcel a Timing Limitation Stipulation, which allows no surface use from November 15 through April 30 (subject to site-specific exceptions) to protect big game winter range, but allows operation and maintenance of production facilities during the winter once initial drilling has been completed. These standard timing stipulations, while they may help to alleviate disruption of winter big game activity during the year of initial drilling, do not address loss and degradation of habitat caused by development, and recent research, suggests they are ineffective at protecting mule deer populations impacted by development.

Winter is a critical time for wild ungulates; therefore, crucial winter range for the most abundant big game species (pronghorn, mule deer, and elk) is often the focus of management and a criterion for analyzing the impacts of resources management on big game. Research has shown

that timing limitations may not be achieving their desired results.¹ The lease parcel noted above contains big game crucial winter ranges and migration corridors with timing limitations. This lease parcel, if sold, will be subjected to mineral development that will inevitably have a negative impact on the big game and their crucial ranges. This is of particular concern as associated human activity may negate the effectiveness of timing restrictions on drilling activities as a means of mitigation (Sawyer *et al.* 2006).² Sawyer *et al.* (2006) recommends that mitigation measures seeking to minimize disturbance to mule deer on winter range consider all human activity across the entire project area and not be restricted to the development of wells or to crucial winter ranges. The BLM should not focus solely on timing limitations in crucial winter ranges as the primary mitigation measure for big game.

In addition to skepticism that timing limitations alone are sufficient to conserve big game populations once energy development exceeds a certain level, their effectiveness further decreases when exceptions are granted to industry, allowing them to enter and conduct activities on these crucial lands during restricted seasons. Because BLM regularly grants exceptions to winter stipulations, the effectiveness of timing limitations to mitigate impacts from surface disturbing activities is unknown.³

Little Mountain Area

The Greater Little Mountain Area (GLMA) is a region of Sweetwater County, WY that includes the boundaries of Wyoming Game and Fish Deer Hunt Area 102. Recreation and wildlife are important commodities among American citizens and the Little Mountain area in Sweetwater County, Wyoming is a place that hosts such significance and value. The juniper woodland area of Little Mountain is a popular recreation spot for members of the GLMC. Visitors retreat there after a long workweek, during the holidays, and for a mid-week excursion. They utilize the backcountry recreational opportunities, drive off highway vehicles, watch wildlife, hunt big game like elk and mule deer, fish streams of trout, enjoy the scenic vistas and take in the clear skies. This rugged Wyoming landscape supports abundant wildlife populations, sensitive species, as well as ample recreation opportunities.

The economic value of hunting in Wyoming and the western United States is profound. Last year the Western Governors' Association recognized this important contribution when they passed the following resolution:

¹ The Wyoming Game and Fish Department considers anything more than four pads per section in crucial ranges for both mule deer and pronghorn to constitute "high" or "extreme" impacts to these habitats requiring mitigation measures in addition to seasonal restrictions. WGF D Recommendations at 11.

² The RFD projects that spacing in the Moxa Arch/Green River Basin geologic area will range from 4 to 8 wells per section. Spacing for coalbed methane production will be 4 to 6 wells per section. Other unconventional gas resources would require 40-acre spacing (8 wells per section). Kemmerer RFD at 7-10 to 7-11.

³ Moreover, timing limitations impose no limit on human disturbances once oil and gas development enters the production phase. This further undermines their effectiveness. See comments of A. William Alldredge, Ph.D. on the Pinedale RMP DEIS

Wildlife-associated recreation brings important economic benefits to communities throughout the West. Small communities in particular benefit from the revenue that comes with tourism, hunting and fishing, and other forms of outdoor recreation. Retail tax revenue for many small towns is provided to a large degree during the key hunting and fishing seasons. In the contiguous Western states, more than 43.6 million people participated in hunting, fishing or wildlife watching in 2006, spending almost \$33.6 billion. This revenue is dependent on significant, reliable wildlife populations, which in turn depend on quality habitat and corridor movement. (Western Governors' Association, *Wildlife Corridors Initiative, Oil and Gas Working Group Report* (May 2008)).

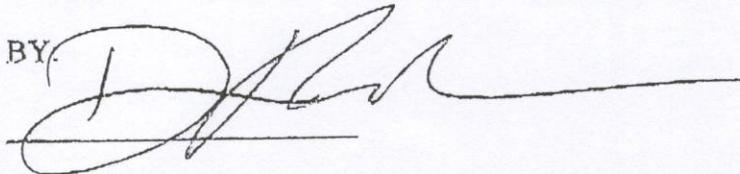
GLMC is especially concerned with the fate of big game and greater sage grouse and the recreational opportunities they provide thousands of sportsmen each fall in southwest Wyoming. Without comprehensive habitat management planning, closely coordinated with the Wyoming Game and Fish Department ("WFGD"), leasing and development of energy resources within Wyoming's core area for greater sage grouse habitat, pronghorn and mule deer crucial winter range, and migration routes for pronghorn, mule deer and near elk routes can have a devastating impact on those wildlife resources and the hunting opportunities they afford.

The GLMC respectfully requests the lease parcel mentioned in this document be withdrawn from the BLM Competitive Oil and Gas Lease Sale of August 4, 2009 indefinitely. Thank you for your consideration and time as you decide on these matters and review the public comments received.

Respectfully submitted on this 20th day of July 2009.

On Behalf of the Greater Little Mountain Coalition

BY:



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