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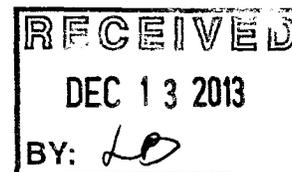
To: Wyoming BLM
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Sender Information

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February 2014 Oil and Gas Lease Sale Protest.

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ROCKY MOUNTAIN WILD

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Denver, Colorado 80202
303.546.0214

<http://rockymountainwild.org>

December 13, 2013

Re: Rocky Mountain Wild Protest of February 2014 Lease Sale

In accordance with 43 C.F.R. §§ 4.450-2 and 3120.1-3, Rocky Mountain Wild protest certain parcels being offered at the Bureau of Land Management's (BLM) February 2014 competitive oil and gas lease sale.

I. Protesting Party:

Rocky Mountain Wild is a non-profit environmental organization based in Denver and Durango, Colorado, that works to conserve and recover the native species and ecosystems of the Greater Southern Rockies using the best available science. RMW was formed in July 2011 by the merging of two organizations, Center for Native Ecosystems ("CNE") and Colorado Wild, and is the legal successor to both parties. Colorado Wild has worked for over a decade to protect, preserve, and restore the native plants and animals of the Southern Rocky Mountains.

Both CNE and Colorado Wild have a well-established history of participation in Bureau of Land Management ("BLM") planning and management activities, including participation in Colorado BLM oil and gas leasing decisions and the planning processes for the various Colorado BLM Field Offices ("FO"). RMW continues the work of each organization to save endangered species and preserve landscapes and critical ecosystems. It achieves these goals by working with biologists and landowners, utilizing GIS technology to promote understanding of complex land-use issues, and monitoring government agencies whose actions affect endangered and threatened species. Its members include approximately 1200 outdoor enthusiasts, wildlife conservationists, scientists, and concerned citizens across the country.

RMW's staff and members visit, recreate on, and use lands on or near the parcels proposed for leasing. Our staff and members enjoy various activities on or near land proposed for leasing, including viewing and studying rare and imperiled wildlife and native ecosystems, hiking, camping, taking photographs, and experiencing solitude. Our staff and members plan to return to the subject lands in the future to engage in

these activities, and to observe and monitor rare and imperiled species and native ecosystems. We are collectively committed to ensuring that federal agencies properly manage rare and imperiled species and native ecosystems. Members and professional staff of RMW are conducting research and advocacy to protect the populations and habitat of rare and imperiled species discussed herein. Our members and staff value the important role that areas of high conservation value should play in safeguarding rare and imperiled species and natural communities, and other unique resources on public land.

Our members' interests in rare and imperiled species and ecosystems on BLM lands will be adversely affected if the sale of these parcels proceeds as proposed. Oil and gas leasing and subsequent mineral development on the protested parcels, if approved without response to public comments made under the National Environmental Policy Act ("NEPA"), consultation required by the Endangered Species Act ("ESA"), and appropriate safeguards to minimize negative impacts, is likely to result in a greatly increased risk of significant harm to rare and imperiled species and native ecosystems. As a result, BLM's decision to lease the protested parcels is not based on the best available science and will result in significant harm to rare and imperiled species and native ecosystems. The proposed leasing of the protested parcels will harm our members' interests in the continued use of these public lands, and the rare and imperiled species they support. Therefore protestors have legally recognizable interests that will be affected by the proposed action.

Matthew Sandler, Staff Attorney for Rocky Mountain Wild, is authorized to file this protest on behalf of the Protesting Parties.

II. Sage Grouse:

Parcels 17, 18, 19, 20, 28, 29, 30, 31, 32, 33, 34, 35, 74, 87, 88, 89, 93, 102, 103, 107, 114, 125, 126, 127, 130, 135, 136, 151, and 159 are within Greater Sage-Grouse Preliminary Priority Habitat (PPH) derived from Wyoming WGFD 2010 data.¹ Under Instruction Memorandum No. WY-2012-19, lands falling within sage grouse Core Areas that are primarily under BLM ownership and are not extensively leased are recommended for deferral from oil and gas leasing. Given the pendency of the Sage Grouse Plan Amendment EIS, and the perilous status of the sage grouse with regard to Endangered Species listing, these lands should all be deferred from leasing pending an outcome of the RMP amendments. 'No leasing in Core Areas' is one reasonable alternative which BLM has been asked to consider in its Sage Grouse Plan Amendments process, and also in its RMP revisions, and leasing Core Area lands regardless of what screening mechanisms they have been subjected to will violate CEQ guidance.

The most recent BLM-sponsored sage grouse Population Viability Analysis placed the population in this region one West Nile Virus outbreak away from functional extinction. Further, peer-reviewed modeling predicted a 98% reduction in lek activity when combined effects of drilling and a West Nile virus outbreak were considered (Taylor et al. 2013).² This information was never analyzed in the EA and this lack of analysis violates NEPA's hard look requirement.

These lease parcels contain sage-grouse leks, nesting habitat, breeding habitat, wintering habitat and brood-rearing habitat. BLM has failed to conduct parcel-by-parcel NEPA analysis to determine the true impacts of leasing. We request that these parcels be withdrawn from the lease sale.

We request that all parcels listed above be deferred from the lease sale pending analysis of whether large-block unleased parcels inside Core Areas are being leased, pursuant to the 2012 Wyoming leasing IM. BLM should do its best to keep largely unleased areas of public land in Core Areas unleased, regardless

¹ All Parcel numbers listed are preceded by WY-1402-

² Available online at <http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0071256>.

of mineral ownership patterns. It is critical that proper stipulations be attached at the leasing stage, when BLM has the maximum authority to restrict activities on these crucial habitats for the protection of the species, and that no exceptions to the stipulations be granted. BLM's failure to do so will permit oil and gas development activities which will contribute to declining sage-grouse populations and ultimately listing by the U.S. Fish and Wildlife Service as a threatened or endangered species, in violation of BLM's duty to take all actions necessary to prevent listing.

III. CONCLUSION

Please consider the issues raised concerning greater sage-grouse in this protest submitted on behalf of Rocky Mountain Wild. We thank you for the parcels you have deferred in consideration of sage-grouse management; but ask that at this crucial junction you defer the protested parcels in an effort to strongly conserve this species.

Sincerely,



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