

Feb. 5, 2009

Selma Sierra  
Utah State Director, BLM  
Utah State Office  
P.O. Box 45155  
Salt Lake City, UT 84145-0155  
Fax: 801-539-4013

**RE: Environmental Impact Statement Needed Prior to Leasing Oil and Gas in the Fillmore Field Office**

Dear Ms. Sierra:

The undersigned hunting, angling and conservation groups are concerned about the proposal to complete an environmental assessment (EA) for federal mineral leasing in the Fillmore Field Office. We would like to reinforce the necessity of addressing the impacts of leasing on fish, wildlife and outdoor recreation resources. We recommend that a comprehensive survey of the post-lease development be included in your analysis, along with a full range of alternatives. This is customary, and has precedence, in completing a full environmental impact statement (EIS) rather than an EA.

While we acknowledge some positive mitigation measures for leasing in the field office, the potential impacts of oil and gas leasing and development on the 4.7 million acres managed by the Fillmore office are of a magnitude and scale that inhibits an EA. While we recognize that the size of an area is not the sole factor necessitating an EIS, we do believe that the outcomes of such decisions could significantly affect the management of fish, wildlife, water and recreational resources, thereby meeting the significance requirement that triggers an EIS. The diverse habitats and abundant fish and wildlife populations present and the overall deficiencies in the reasonable foreseeable development scenario (RFD) being used for this process require a more in-depth review than an EA can provide.

Elk, mule deer, Rocky Mountain bighorn sheep and sage grouse populate this remote part of Utah, along with genetically pure populations of Bonneville cutthroat trout. The region encompasses the West Desert/Vernon and Fillmore/Oak Creek limited-entry buck mule deer hunting units and the West Desert/Deep Creek, Fillmore/Oak Creek South, Fillmore/Pahvant, Southwest Desert and Central Mountains/Nebo limited-entry bull elk hunting units. Of particular importance to fish and wildlife is the area in and around the Deep Creek Mountains. The impacts of oil and gas projects must be carefully considered and analyzed prior to leases being issued in order to balance drilling with the sensitive habitats on which its fish and wildlife populations depend.

The BLM made the right decision to defer leases from the December 2008 oil and gas lease sale so that further study could be completed. We do not feel, however, that the proposed EA provides the level of detail necessary for the decision being made, nor do

we believe that a “no significant impact” conclusion can be reached for this action. The region’s significance for fish and wildlife, coupled with the fact that the Fillmore EA is tiered to an old oil and gas leasing EA and a resource management plan (RMP) that are both more than 20 years old, attests to the need for an EIS that evaluates the range of potential impacts posed by oil and gas drilling.

Across Utah, BLM field offices and national forests have recently completed or are conducting RMP revisions – in all, 12 NEPA documents dictating where and how oil and gas development will be allowed to occur across a broad swath of federal public lands – using EISs. Decisions of this scope demand the kind of detail that can be provided only by an EIS. The Fillmore office should follow suit.

Sportsmen believe that oil and gas leasing and development can be a legitimate use of public lands. However, before leases are issued, a full analysis of the landscape and fish and wildlife populations must be conducted, the effects of drilling disclosed, a full range of alternatives considered and effective stipulations developed. Moreover, the public must be engaged in this process. Most importantly, given the impacts and inevitable development once leases are issued, we do not believe that a “finding of no significant impact” can be justified and, therefore, by law an EIS must be completed. Doing so will allow the BLM to amend the long-outdated Fillmore RMP and ensure responsible energy development on our publicly owned lands.

Respectfully,

Backcountry Hunters and Anglers  
Mike Beagle

Federation of Fly Fishers  
R. P. “Van” Van Gytenbeek

Great Basin Chapter of Trout Unlimited  
Don Duff

Mule Deer Foundation  
Miles Moretti

National Wildlife Federation  
John Gale

Theodore Roosevelt Conservation Partnership  
Joel Webster

Utah Trout Unlimited Council  
Bob Dibblee

CC: Ken Salazar, Secretary of Interior

CC: Terry Catlin, Utah BLM Energy Team Lead