

May 2, 2018

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Zinke,

The undersigned sportsmen conservation organizations representing thousands of hunters and anglers in Wyoming and across our great country – request that you defer the BLM's 2018 Fourth Quarter Oil and Gas Proposed Leases within the Red Desert to Hoback Mule Deer Migration Corridor until the completion of the BLM Rock Springs Resource Management Plan and implementation of Secretarial Order 3362. By deferring the leases, it provides the opportunity to develop upfront comprehensive plans for oil and gas leasing in these critical areas that reduces conflicts, incorporates local input, and provides balance for economic, conservation, and social concerns.

A recent analysis from the University of Wyoming shows hunting, fishing and wildlife viewing activities made a significant impact on our economy. In 2016 these users spent an estimated \$788 million in Wyoming, with the total economic importance up to \$1 billion in business activity. We also value our energy resources as an important economic driver for our state and know the importance of planning for development to avoid unnecessary impacts to our wildlife.

The now famous Red Desert to Hoback corridor is the longest mule deer migration ever recorded where deer travel one-way distance of 150 miles from southwest Wyoming to the high mountain ranges. This corridor was officially recognized as vital habitat in 2016 under the Wyoming Game and Fish Department's Ungulate Migration Corridor Strategy. Given your recent Secretarial Order 3362 – *Improving Habitat Quality in Western Big-game Winter Range and Migration Corridors*, we recommend the proposed leases in the Red Desert to Hoback Mule Deer Migration Corridor be deferred until guidance is issued by DOI on implementation of the S.O. as it relates to energy development and avoidance, minimization and mitigation of potential impacts.

The Secretarial Order also "seeks to expand opportunities for big-game hunting by improving priority habitats to assist states in their efforts to increase and maintain sustainable big game populations across western states." A recent study examining 17 years of data found a 36% decline of mule deer wintering on the Pinedale Anticline during energy development despite aggressive onsite mitigation efforts. As a result of declining populations, hunting opportunity was lost by a one-week reduction of the season, reducing the number of non-resident licenses by 50%, and resulting in a 45% harvest reduction by 2015. Further, harsh winters like 2016-17 caused unprecedented mortality up to 40% for the Sublette mule deer herd. Additional development in critical habitat resulting from the sale of these leases could result in further population reduction and hunting opportunity.

Some of the proposed leases in the Corridor are also within mule deer crucial winter range. According to the Mule Deer Working Group's fact sheet, "once mule deer arrive on winter ranges with developed gas fields they avoid infrastructure (e.g., roads and well pads), which effectively reduces the size of usable winter range and could result in population decline. A common misperception is mule deer "acclimate" or "habituate" to energy development, but long-term studies show deer continue to avoid infrastructure more than 10 years after development." Leasing in crucial winter range would also conflict with Secretarial Order 3362.

The requested leases to be deferred are: Parcels 180, 218, 219, 220, 263, 304, and 323. The total acreage of these parcels makes up only a small portion of the 700,000 acres proposed sale.

Given your Secretarial Order and exposure of the Red Desert to Hoback migration corridor by national press, we deem it to represent "ground zero" for conserving these vital habitats for big game. Thank you for reviewing our request, your leadership for sportsmen and wildlife, and your service to our great country.

Sincerely,

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CC:

Governor Matt Mead

Senator Mike Enzi

Senator John Barrasso

Representative Liz Cheney

Sweetwater County Board of Commissioners

Sublette County Board of Commissioners

Teton County Board of Commissioners

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