



THE WILDERNESS SOCIETY

October 31, 2001

Mr. James L. Connaughton, Chair
Council on Environmental Quality
Executive Office of the President
17th and G Streets, NW
Washington, DC 20503

Attention: Task Force

Dear Mr. Connaughton:

The Wilderness Society appreciates the opportunity to comment upon the August 10, 2001 Notice regarding the establishment of a federal interagency Task Force "to work with and monitor federal agencies' efforts to expedite their review of permits or take other actions necessary to accelerate the completion of energy-related projects..." We are very concerned about the pro-development bias inherent in the Task Force's articulation of its mission in the above-referenced Notice, as will be explained in detail below.

In enacting the National Environmental Policy Act, Congress recognized that nearly all federal activities affect the environment in some way and mandated that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment. Perhaps it is worthwhile to remind the Council on Environmental Quality (CEQ) of the purposes of NEPA as set for in Title I of statute, and of CEQ's own responsibilities in assuring that the purposes of NEPA are met:

b) In order to carry out the policy set forth in this Act, it is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may –

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities;
- and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

(c) The Congress recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment. (Sec. 101 [42 USC § 4331] (b))

CEQ's responsibility with regard to the purposes of the Act as set forth above is articulated in Title II, Sec. 204 of NEPA:

...to review and appraise the various programs and activities of the Federal Government in the light of the policy set forth in title I of this Act for the purpose of determining the extent to which such programs and activities are contributing to the achievement of such policy, and to make recommendations to the President with respect thereto...

Unfortunately, the Task Force's mission, as articulated in the Notice, is contrary to CEQ's responsibilities as set forth in Title II of NEPA noted above, and will undermine the objectivity of federal agency decision-making under NEPA and other statutes, by introducing a pro-energy development bias in CEQ's review federal decisions regarding energy development project proposals.

For example, according to the above-referenced Notice:

...to work with and monitor federal agencies' efforts to expedite their review of permits or take other actions as necessary to *accelerate the completion of energy-related projects*, while maintaining safety, public health, and environmental protections. (emphasis added)

However, in the Federal Land Policy and Management Act (FLPMA, PL 94-579), Congress set forth the following statutory mandate for management of the public lands and resources under the jurisdiction of the Bureau of Land Management:

The Congress declares that it is the policy of the United States that the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain

public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use...(43 U.S.C. 1710 (a)(8))

The Bureau of Land Management (BLM) has jurisdiction over the leasing and development of oil, natural gas, coal, coal-bed methane, geothermal steam, oil shale and other minerals occurring on the public lands it manages under the auspices of FLPMA and the Mineral Leasing Act (30 U.S.C. 181 et. seq.). (The BLM also has responsibilities for certain aspects of energy mineral development under lands administered by other federal agencies, such as the Forest Service.) In addition, the BLM has authority to issue permits for rights-of-way for pipelines and electric transmission lines that cross public lands.

For many years the BLM has operated a robust program of energy mineral leasing and development. As a consequence, today there are over 57,000 operating oil and gas wells on the public lands, and fully one-third of the nation's annual coal production derives from lands it manages. In addition, well over 90 percent of the lands the Bureau manages in the "Overthrust Belt" states of Colorado, Montana, New Mexico, Utah and Wyoming are available for oil and gas leasing, or over 110 million acres (see Attachment I). Today, oil and gas leases cover 25 million acres of the public lands. Each year, the BLM permits thousands of new exploration or development wells. For example, in FY 1999, the BLM issued over 3,400 drilling permits.

In carrying out its energy development programs, the BLM is also statutorily obligated to protect other resources and values that can be adversely affected by oil, gas, and other energy development related activities. The BLM is also legally obligated to "preserve and protect certain public lands in their natural condition," as noted above. Like other federal land management agencies, the BLM is responsible for complying with the Endangered Species Act, and the lands it manages harbor over 3,000 wildlife species, including 309 species listed under the ESA as threatened or endangered.

Moreover, some of America's most magnificent natural landscapes are managed by the BLM, lands which in many instances deserve protection under the Wilderness Act of 1964. Within the BLM a new Office of Landscape Conservation System is responsible for assuring that the Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, National Monuments, and National Conservation Areas under the Bureau's jurisdiction are managed in a way that does not impair their archeological, cultural, paleontological, wildlife, environmental and esthetic values. Some lands managed by the BLM harbor values of particular concern to American Indian people, and the Bureau is statutorily obligated to protect such values in managing the public lands as well. In other words, the Bureau of Land Management is statutorily obligated to protect a wide range of cultural and environmental values from the adverse impacts of oil, gas, coal and other energy-related activities.

Likewise, the Forest Service is required by various laws - including the National Environmental Policy Act, National Forest Management Act, and Endangered Species

Act - to manage the national forests and national grasslands in an environmentally sound manner. Regarding development of oil and gas resources in the National Forest System, "the hybrid goal of this nation is to encourage the development of domestic oil and gas production while at the same time ensuring that such development is undertaken with an eye toward environmental concerns." *Park County Resource Council v. USDA*, 817 F.2d 609 (10th Cir. 1987).

The Forest Service shares responsibility with the Bureau of Land Management for management of energy resources in the National Forest System. While the BLM is responsible for issuing oil and gas leases, the Forest Service is required by law to evaluate the potential effects of development on endangered species, environmental quality, and other forest resources. The Federal Onshore Oil and Gas Leasing Reform Act of 1987 strengthened the Forest Service's role in the leasing process by giving the Forest Service a statutory veto over BLM's issuance of oil and gas leases on national forest land. 30 U.S.C. 226(h).

The Forest Service is required to fulfill its environmental duties regarding energy resource development at several stages in the decision-making process. First, the agency must consider mineral exploration and development during the periodic revision of land and resource management plan as required by the National Forest Management Act. 36 CFR 219.22. An important part of the forest planning process is the identification of lands that are suitable for resource management. 16 U.S.C. 1604(g)(2)(A). The National Academy of Sciences has recommended that the Forest Service and BLM should use their planning processes to isolate lands as unsuitable for oil and gas activity where other potential uses "clearly outweigh" oil and gas potential. Committee on Onshore Oil and Gas Leasing, National Research Council, *Land Use Planning and Oil and Gas Leasing on Onshore Federal Lands*, 1989, p. 3-4. At the leasing stage, the Forest Service must carefully evaluate the potential effects of development and involve the public by preparing an environmental impact statement prior to issuing oil and gas leases without no-surface-occupancy stipulations. *Sierra Club v. Peterson*, 717 F.2d 1409 (9th Cir. 1983); *Conner v. Burford*, 848 F.2d 1441 (9th Cir. 1988); *Bob Marshall Alliance v. Hodel*, 852 (9th Cir. 1988).

This dual obligation – to both foster energy development projects on the public lands and protect the environment and other resource values from the adverse impacts of energy development activities – puts both the BLM and the Forest Service in the position of having to make choices between the conflicting goals of resource protection and development. Unfortunately, the Task Force has ignored this reality in articulating its first goal as follows: "to accelerate the completion of energy-related projects." If federal permitting agencies were to fulfill this goal, the permitting process would be a biased one where the approval of any energy project permit application would be a foregone conclusion, regardless of its impacts on the other values and resources the BLM and Forest Service are obligated to protect. Successfully implementing the goal of "accelerating completion of energy projects" is therefore an inappropriate task for CEQ's Task Force.

The CEQ Task Force instead should be in the business of assuring that energy development project proposals are not given federal agency approval unless they are in full compliance with all of the legal obligations that may apply.

It is furthermore disturbing that that CEQ's notice states that:

The Task Force will work through an operational approach that addresses impediments to federal agencies' completion of decisions about energy-related projects in a way that will increase the production, transmission, and conservation of energy..."

Although the goal of timely completion of the decision-making process is laudable, it is obvious that the goal is to not simply assure expeditious decision-making, but instead is the expeditious issuance of permits. Coupled with the Task Force's request for information and comments about "particular energy projects" and "major pending projects or major projects under development," it is apparent that the Task Force's only interest is in assuring that *all* such projects receive federal approval. Again, this biased approach to federal decision-making is inappropriate and probably illegal. CEQ instead should assure that any projects that *may* be permitted do so only if in full compliance with all environmental and land use prescriptions that apply to federal lands affected by the project proposal, and in fulfillment of the goals articulated in Title I of NEPA referenced above.

In order to eliminate the clear bias in favor of permitting energy projects regardless of the environmental conflicts they may pose, we suggest the following changes in the Task Forces mission statement:

- (1) To assure that decisions regarding energy related projects are made in a timely fashion;
- (2) To insure that energy-related projects that receive federal agency approval do so only when in full compliance with all pertinent statutes, regulations and policies that assure protection of environmental values;
- (3) To improve the transmission of energy in environmentally safe ways; and
- (4) To better coordinate federal agency permitting in geographic areas where increased permitting activities are expected.

CEQ's Notice also invited the public to comment on particular energy projects. Perhaps inadvertently the Notice omitted an invitation to the public to call to the Task Force's attention areas of the public lands which should be either protected from energy development projects, or where special care should be taken to assure that sensitive environmental or cultural values are preserved if energy development activities do take place. We have appended to these comments (Attachment II) our presentation entitled "Too Wild To Drill," a description of 15 areas of the public lands which have important values that should be protected from energy development schemes. The list is not inclusive, but is intended to provide the Task Force with a sampling of the issues that

arise when energy production projects are proposed for especially sensitive areas of the public lands and national forests.

In conclusion, The Wilderness Society urges the Council on Environmental Quality's Task Force to focus its efforts on ways to improve the quality of federal agency decision-making with respect to energy-related projects in ways that will assure that only those projects that are compatible with other resource values are approved. The Task Force's efforts should assure that environmentally sensitive resources occurring on federal lands are protected from damage accompanying energy development projects.

Sincerely,

David Alberswerth
Director, Bureau of Land Management Program

attachments



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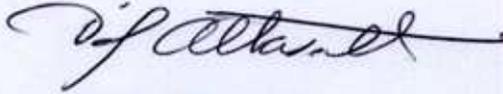
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Sincerely,

A handwritten signature in black ink, appearing to read "David Alberswerth", written in a cursive style.

David Alberswerth
Director, Bureau of Land Management Program

attachments

Attachment I

Availability of Public Lands

The vast majority of public lands are available for leasing. In the states with considerable production of 116.6 million acres only 2.9 million acres are not open for leasing. In Colorado 16.2 million acres are open and 600,000 closed to leasing; in Montana out of 19 million acres 400,000 are closed; in New Mexico of 29.9 million acres of lands only 1.3 million is not open to leasing; in Utah 900,000 acres are closed to leasing leaving 21.2 million acres open; in Wyoming 700,000 acres are closed out of 28.6 million.

State	Total Acres (Millions)	Acres Open to Leasing	Acres Closed to Leasing
Colorado	16.8	16.2	0.6
Montana	19.0	18.6	0.4
New Mexico	29.9	28.6	1.3
Utah	22.1	21.2	0.9
Wyoming	28.6	27.9	0.7
Total	116.4	112.5	3.9
Percent		96.6	3.4

Wyoming

BLM Acreage by Oil & Gas Stipulations

Resource Area	Standard Seasonal +		Stipulations		Total oil & gas estate
	Stips	Other	NSO	Off-limits	
Buffalo	3,948,900	671,800	80,300	30,100	4,731,100
Newcastle	1,566,284	123,590	126	0	1,690,000
Platte River	7,255,000	1,044,000	180,000	35,160	8,514,160
Great Divide	0	4,959,073	2,070	38,857	5,000,000
Lander	1,349,750	1,135,560	141,990	72,700	2,700,000
Green River	921,600	2,277,160	71,000	365,240	3,635,000
Kemmerer	832,192	681,922	1,701	34,456	1,550,271
Pinedale	437,000	709,000	21,485	21,501	1,188,986
Bighorn Basin	1,165,600	1,393,600	96,100	131,310	2,786,610
Cody	490,000	740,000	264,200	24,570	1,518,770
Total	14,017,426	13,063,905	778,672	723,794	28,583,797
Percent	49.0%	45.7%	2.7%	2.5%	

AREAS OF SPECIAL CONCERN

BLM, the State of Wyoming, the trona industry(UP), and the oil/gas industry are presently working together to find a solution for simultaneous development within the Known Sodium Leasing Area. BLM, the State, and the two industries have contributed over \$600,000 to drill two surfaced cased wells for monitoring during underground mining of the trona. BLM has suspended all oil/gas leases within the KSLA for three years to complete the study.

Southwest Wyoming is 40% crucial winter range and 80% winter range which requires numerous stipulations for wildlife, cultural, T&E, and other resource values. Wildlife stips range from November 15 thru April 30 and from February 1 to July 31 for raptor and sage grouse. In some cases the special requirements last 9 months of the year. The Bridger Tetons are a special case.*

Only one APD has been denied in the past two years for wildlife consideration, while 1131 were approved albeit some with special stipulations.

* See 4/20 memo, attached below.

Utah

BLM Acreage by Oil & Gas Stipulations

+ Note: Pre-GSENA data

Resource Area	Standard Stipulations			NSO	Off-limits	Total oil & gas estate
	Stips	Other	Seasonal +			
Dixie		28,715	91,304	56,120		
Beaver River		199,625	24,357	0		
Kanab		22,689	127,179	76,133		
Escalante		38,644	66,889	85,713		
Cedar City	4,484,722	289,673	309,729	217,966	5,302,090	
Grand		866,170	136,613	60,434		
San Juan		731,008	209,906	189,886		
Price River		874,769	49,038	84,762		
San Rafael		39,829	232,987	156,968		
Moab	2,173,440	2,511,776	628,544	492,050	5,805,810	
Henry Mountain		488,867	34,011	61,592		
Sevier River		273,272	19,022	0		
House Range		68,217	105,359	34,416		
Warm Springs		96,028	49,949	5,041		
Richfield	5,686,679	926,384	208,341	101,049	6,922,453	
Pony Express		553,996	123,070	0		
Bear River		224,323	5,531	39,705		
Salt Lake	1,563,164	778,319	128,601	39,705	2,509,789	
Diamond Mountain		523,255	49,603	17,946		
Bookcliffs		692,283	53,659	15,100		
Vernal	255,784	1,215,538	103,262	33,046	1,607,630	
Total	14,163,789	5,721,690	1,378,477	883,816	22,147,772	
Percent	64.0%	25.8%	6.2%	4.0%		

AREAS OF SPECIAL CONCERN

McCracken Extension- This is a Navajo Issue involving 48,000 acres of split federal and Tribal estates. BLM has placed a moratorium on any new leasing until NEPA is completed. The Navajo have asked the Secretary for the Mineral Estate

Kane Spring Horizontal Well Play- Further development of this promising area has been delayed indefinitely because of the need to prepare an EIS.

Combined Hydrocarbon Lease Sale- Industry has expressed increased interest in a combined sale in order to gain access to conventional oil and gas associated with areas identified as Known Tar Sands areas.

New Mexico BLM Acreage by Oil & Gas Stipulations

Resource Area	Stipulations			Off-limits	Total oil & gas estate
	Standard Stips	Seasonal + Other	NSO		
Farmington	1,848,000	314,300	20,700	96,000	2,279,000
Caballo	1,704,800	39,000	8,200	0	1,752,000
Mimbres	3,532,000	262,830	65,000	266,950	4,126,780
Socorro	1,110,000	757,000	36,000	297,000	2,200,000
Rio Puerco	1,526,700	30,000	6,700	310,400	1,873,800
Taos	1,240,500	152,500	17,400	63,200	1,473,600
Carlsbad	3,591,000	315,000	99,000	63,000	4,068,000
Roswell	8,411,000	947,000	4,000	240,000	9,602,000
Total	22,964,000	2,817,630	257,000	1,336,550	27,375,180
Percent	83.9%	10.3%	0.9%	4.9%	

AREAS OF CONCERN

There is controversy over oil/gas development in the Potash area. 105 Applications to Drill (APD) have been denied and are under appeal. BLM requires directional drilling methods in certain sensitive areas such as the Carlsbad Caverns and other caves in the area. Also, BLM (New Mex) requires mitigation for State and Federally listed T&E species through special use stips. Industry thinks this is bad science. Further, we have been unable to get the oil and gas industries to come to agreement with the potash Industry on a study costing about \$300,000. Negotiations are back on track for the study.

Montana

BLM Acreage by Oil & Gas Stipulations

Resource Area	Stipulations			Total oil & gas estate	
	Standard Stips	Seasonal + Other	NSO		Off-limits
Judith	252,760	596,081	3,553	15,197	867,591
Valley	486,599	579,920	1,600	66,525	1,134,644
Big Dry	4,658,000	2,600,000	160,000	82,000	7,500,000
Billings, Powder River, South Dakota	2,578,000	1,940,000	98,000	54,000	4,670,000
Havre, Great Falls * Headwaters, Great Falls	1,227,014			111,000	1,338,014
Phillips	251,000	315,000	30,000	60,000	656,000
Garnet	735,122	584,425	29,665	36,240	1,385,452
North Dakota **	112,810	84,076	8,180	520	205,586
Total	253,583	206,811	0	460,394	460,394
Percent	57.9%	37.9%	1.8%	2.3%	

* Standard stipulation package includes timing, controlled surface use, and NSO stipulations.

** Includes both timing and NSO stipulations.

Note: Dillon RA covered by MFP. All lands except WSAs open subject to above standard slips.

AREAS OF SPECIAL CONCERN

SweetGrass Hills- This area involves protection of a large area considered sacred by Native Americans. The area is not reservation but raises the question of protecting cultural values through NEPA. There are oil and gas interests as well as several mining claims.

Issues in Montana center around the numerous stipulations to protect soils by restricting activities on roads greater than 30 degrees, Sagebrush grouse strutting areas, Elk wintering grounds, cultural values, grizzly habitat, etc. Leasing is perceived by industry as doable but only after exhausting opportunities on State and private land.

Colorado BLM Acreage by Oil & Gas Stipulations

Resource Area	Stipulations			Total oil & gas estate	
	Standard Stips	Seasonal + Other	NSO		Off-limits
White River *	1,721,470	2,187,280	148,450	83,730	4,140,930
Grand Junction	653,868	545,263	131,340	117,790	1,448,261
San Luis	219,291	384,105	13,855	3,620	620,871
Gunnison	595,344	49,962	35,605	46,007	726,918
Royal Gorge	1,715,897	736,847	37,220	70,984	2,560,948
Uncompahgre	511,074	174,542	80	21,038	706,734
Little Snake	765,610	1,248,870	57,894	35,380	2,107,754
Glenwood Springs	60,300	1,035,290	161,648	27,280	1,284,518
Kremmling	380,200	246,905	27,775	10,120	665,000
Northeast Planning Area	240,000	181,000	125,000	126,000	672,000
San Juan/ San Miguel Planning Area	721,872	910,408	110,128	103,152	1,845,560
Total	7,584,926	7,700,472	848,995	645,101	16,779,494
Percent	45.2%	45.9%	5.1%	3.8%	
* Under proposed RMP					
White River - current	1,721,470	1,423,240	19,730	83,730	3,248,170

AREAS OF SPECIAL CONCERN

The White River RMP is quite controversial as it proposes an increase of 750% in NSO's for protection of mostly cultural values. As in many areas most industry concern involves the time and layering of numerous stipulations attached to leases. Protection for wildlife habitat is a common concern. RMOGA has voiced concern for failure of the plan to consider socio-economic (jobs) values in the proposal.

The Resource Use and Protection Directorate is evaluating this concern in concert with BLM economists in Denver to pilot a project to better address their issues.

January 4, 2001

Federal Oil & Gas Leases Issued

Calendar Years 1989 to 2000

(includes all O&G leases issued on BLM, FS, and all other Federal lands,
except NPR-A shown below)

	Number of Leases	Acres Leased	Bonus Bids Received*
1989	8,344	6,559,544	\$62,847,022
1990	6,383	5,121,444	\$49,363,154
1991	5,289	4,110,355	\$41,493,134
1992	3,654	2,710,843	\$18,804,174
1993	3,960	3,060,888	\$22,747,870
1994	4,315	3,780,180	\$41,430,784
1995	4,418	3,660,764	\$47,339,046
1996	3,924	2,780,209	\$31,979,336
1997	4,726	3,901,194	\$58,494,833
1998	4,591	4,295,852	\$77,214,000
1999	2,531	2,346,662	\$64,992,064
2000	2,818	2,634,874	\$52,359,670

* Bonus Bids Received are by fiscal year rather than calendar year

Oil & Gas Leases Issued in the NPR-A

Calendar Years 1989 to 2000

(National Petroleum Reserve-Alaska)

	Number of Leases	Acres Leased	Bonus Bids Received
1999	132	861,318	\$104,598,258

Year	Competitive Leases Issued			Non Competitive Leases Issued			Total Issued			APDs Approved
	Number	Acres Leased	Bonus Bids	Number	Acres Leased	Number	Acres Leased	Number		
1980	301	71,623	22,048,947	10,208	11,184,951	10,509	11,256,574	3,318		
1981	527	126,070	103,314,389	12,038	26,000,116	12,565	26,126,186	1,886		
1982	445	991,186	95,304,216	19,762	54,927,921	20,207	55,919,107	1,772		
1983	505	131,702	31,150,106	11,469	18,247,476	11,974	18,379,178	1,851		
1984	879	394,264	49,484,379	6,714	10,114,669	7,593	10,508,933	2,617		
1985	1596	1,585,051	48,671,382	9,893	16,385,732	11,489	17,971,583	1,969		
1986	1263	353,055	26,643,088	7,746	9,584,437	9,009	9,937,492	1,947		
1987	890	211,488	33,345,494	6,357	7,215,215	7,247	7,426,703	1,886		
1988	2464	1,913,023	51,208,738	6,770	10,302,550	9,234	12,215,573	1,486		
1989	4058	2,831,737	62,847,022	4,294	4,974,040	8,352	7,805,777	1,872		
1990	3496	1,723,845	49,363,154	3,056	5,560,364	6,552	7,284,209	1,851		
1991	3140	1,845,365	41,493,134	2,325	2,591,651	5,465	4,437,016	2,617		
1992	2034	1,118,816	18,804,174	1,956	2,072,447	3,990	3,191,263	1,969		
1993	2614	1,744,777	22,747,870	1,426	1,439,134	4,040	3,183,911	1,947		
1994	2887	2,147,415	41,430,784	1,286	1,677,147	4,173	3,824,562	2,222		
1995	3151	2,394,854	47,339,046	1,369	1,473,920	4,520	3,868,714	2,113		
1996	2477	1,589,795	31,979,336	898	933,763	3,375	2,523,558	1,870		
1997	3192	2,265,452	58,494,833	988	1,201,646	4,180	3,467,098	1,959		
1998	3177	2,480,035	77,214,000	928	1,122,096	4,105	3,602,131	2,580		
1999	2509	2,962,094	59,624,005	566	640,456	3,075	3,602,550	3,148		
2000								1,823		
								3,496		

Source: Public Land Statistics
 Note: APD's not reported in PLS until 1985

*Hand Carried to Dean Moody
 1/10/01 2 PM.*



Solar power plant.

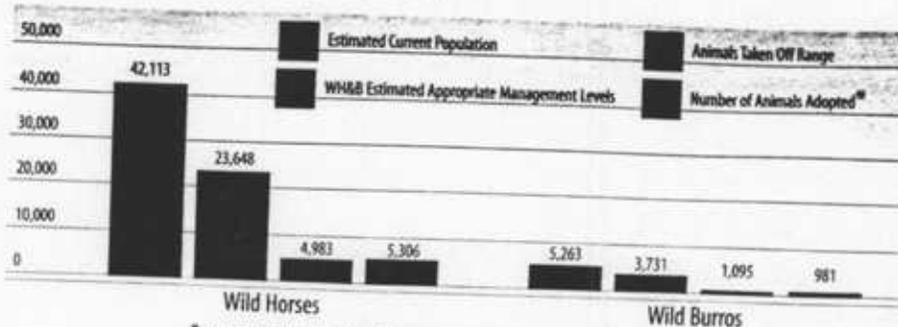


Two burros munch grass during a Bloomington, Illinois, wild horse and burro adoption.

National Commercial Use Activity on BLM-Managed Land, Fiscal Year 1999

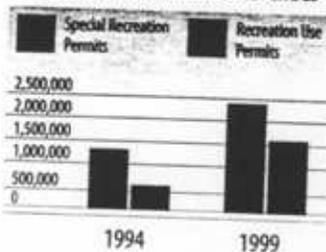
Grazing Permits and Leases	18,568 permits and leases, 12,994,883 Animal Unit Months
Timber Volume Sold	17.6 million cubic feet, 105.2 million board feet
Oil and Gas Leasing	1,537 new holes started, 10.72 million acres in producing status, 57,687 currently producing wells
Helium Activity	8 active helium storage contracts, 5.7 billion cubic feet stored, 54 independent producers.
Geothermal Production	51 producing leases, 5.9 million megawatt hours of energy
Coal Production	134 producing leases, 387.6 million tons produced
Mining Materials (Salables)	2,910 permits issued, 11.75 million cubic yards produced
Nonenergy Leasables	505,626 acres under lease, 15.75 million tons produced
Exploration and Mining Activity (Locatables)	640 notices reviewed, 155 plans of operation reviewed
Rights-of-Way	2,690 granted

National Wild Horse and Burro Program

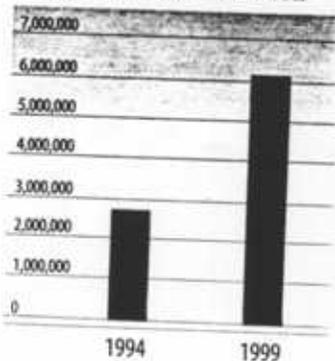


* Some animals are not adopted the same year that BLM removes them from the range

Recreation Use Permits - Revenues



Recreation Use Fees - Revenues



National Recreation Figures - on BLM-Managed Land, Fiscal Year 1999

Recreation Use Permits	Numbers		Revenues	
	1994	1999	1994	1999
Special Recreation Permits	15,072	42,356	\$1,286,271	\$2,361,028
Recreation Use Permits	102,902	229,279	\$526,000	\$1,573,743
Recreation Use Fees		1994		1999
Land and Water Conservation Fund and Fee Demonstration Authority (Recreation Use Permits, Concessions, Special Recreation Permits, Golden Passports)		\$2,229,287		\$5,714,029
Cost Recovery and Other Contributions		\$488,218		\$457,066
Total Revenues		\$2,717,505		\$6,171,095

Recreation Fee Demonstration Program, FY 1999: 95 projects, \$5,153,000 collected

Attachment II

Too Wild to Drill



EXECUTIVE SUMMARY

www.wilderness.org

From the deep hardwood shade of Eastern forests to the lush alpine meadows of the Rocky Mountains, to the red slick-rock canyons of the West to the sun-baked Chihuahuan Desert, America's public lands are a remarkable study in variety and contrasts. They are home to a stunning array of wildlife, plants, geologic formations, and historic treasures. They offer unparalleled opportunities to delight in the never-ending banquet of sights, sounds, and smells of this nation's natural and cultural heritage.

The national lands offer different people different reasons to love and protect them. The angler treasures the relaxed beauty of a mountain stream while the hunter revels in the bugling of the elk on a frosty fall morning. For the rock lover, it's the thrill of reading the Earth's story told in layer upon layer of shale and sandstone millions of years old. For the Native American, public lands may be sacred, as is true of the Gwich'n people and the Arctic Coastal Plain. Even the names of these wild lands—the Red Desert, the Grand Staircase-Escalante National Monument, Badger-Two Medicine National Forest, the Upper Missouri River Breaks National Monument, and the Vermillion Basin—stir our senses and entice our imaginations with a hint of the beauty and secrets they hold.

Yet there is another kind of contrast to be found on the national lands, one that is not nearly so inspiring. If you were to fly over Wyoming, Montana, Colorado, Utah, and New Mexico, the region that energy experts

"Arid terrain peopled by cactuses and fringe-toed lizards, lush tree fern forests that shelter rare species of birds, forbidding badlands sculpted by eons of wind and water, and quite wooded trails that soothe the spirit—all belong to the collective national heritage that lies just beyond your front door."

From Natural America
by T. H. Watkins.

refer to as the "overthrust belt," you would get a bird's-eye view of the beauty of some of the nation's wildest lands. At the same time, you might be surprised (and perhaps dismayed) to find how few wild lands remain undamaged by energy development. Indeed, in places such as the Upper Green River Basin in Wyoming, intensive oil and gas drilling encroach upon untouched lands important to elk, deer, antelope, and sage grouse.

Now, even these pockets of wild lands are threatened. Although the vast majority of public lands in this region—well over 100 million acres—are already available for oil and gas development, the Bush administration is aggressively pushing a

"drill America first" energy plan that would target some of our nation's wildest, most valuable lands, including National Monuments, Wilderness Study Areas, roadless areas within the National Forests, and the Arctic National Wildlife Refuge. In addition, the Bush administration is seeking to weaken environmental safeguards afforded wildlife and other environmental values on the lands that already are available for development.

The Bush Energy Plan Threatens Wild Lands

There are some places where it is appropriate to drill. The sixteen areas contained in this report, however, are high-profile examples of treasured public lands that should not be developed. To compile this list, we examined the immediacy and gravity of the threat, including the permanence of damage and the natural significance of the area. In addition, many of the areas in the report were temporarily or administratively put off limits to oil and gas development following intensive public comment processes during the past few years. There are many other wild areas that are threatened by the Bush administration's energy plan; therefore, this list is by no means comprehensive.

- The Arctic National Wildlife Refuge, Alaska
- California Coastal National Monument, California
- Carrizo Plain National Monument, California
- San Juan National Forest, Colorado
- Vermillion Basin, Colorado
- Rocky Mountain Front, Montana
- Upper Missouri Breaks National Monument, Montana
- Otero Mesa, New Mexico
- Finger Lakes National Forest, New York
- Little Missouri Grasslands, North Dakota
- Book Cliffs-Desolation Canyon, Utah
- Grand Staircase-Escalante National Monument, Utah
- Lockhart Basin, Utah
- Bridger Teton National Forest, Wyoming
- Red Desert, Wyoming
- Upper Green River Basin, Wyoming

What's Wrong with the Bush Energy Plan?

The Bush administration has created the myth that an oil and gas bonanza awaits us in places like the Rocky Mountain Front, the Red Desert, and Upper Missouri River Breaks National Monument. This myth is reminiscent of the "boom and bust" economy of

years past. An energy policy cannot be made in isolation from environmental concerns. Developing an energy policy involves fundamental choices about the quality of the air we breathe and the water we drink and about the future of our remaining wilderness and whether these magnificent lands will be here for our children and their grandchildren.

While the Bush administration's energy plan claims to protect the environment and promote energy efficiency and renewable resources, it is significantly weighted toward expanding traditional energy supplies, with its main reliance on the fuels whose extraction and use pose the greatest dangers to public health and the environment.

The Bush administration's National Energy Policy recommends that:

1. The Interior Department "[e]xpedit[e] the ongoing Energy Policy and Conservation Act study of impediments to federal oil and gas exploration and development."
2. The Interior Department "[r]eview public lands withdrawals and lease stipulations...to consider modifications where appropriate."
3. "... the President direct the Secretary of the Interior to work with Congress to authorize exploration, and, if resources are discovered, development of the 1002 Area of ANWR [Arctic National Wildlife Refuge]."

The Bureau of Land Management (BLM) recommended to the Cheney Energy Task Force (*Energy Options Available to Federal and Indian Lands*, March 20, 2001):

1. The Interior Department "[r]eview wilderness study areas where there is administrative authority to change BLM's planning decisions to examine their potential for energy development and potential release."
2. "Subsequent to the Roadless Area Conservation Rule review, reconsider Forest Service plans as they affect the availability of the overthrust belt for new oil and gas leasing..."

ON THE RECORD

The Bush administration has repeatedly stated that National Monuments and other public lands should be open to oil and gas development. Here are a few examples.

President Bush stated that, "...there are parts of the monument lands where we can explore without affecting the overall environment."

*Bureau of National Affairs Inc.,
March 13, 2001*

The BLM is ramping up efforts to roll back protections for Wyoming's Red Desert.

Billings Gazette, May 15, 2001

Interior Secretary Gale Norton wants to see protections relaxed and/or boundaries changed in order to permit drilling in National Monuments.

ABC's This Week, April 22, 2001

The *Albuquerque Journal* reported on June 10, 2001, that "[f]ederal land managers in northwestern and southeastern New Mexico are gearing up for more oil and gas drilling."

How Much Oil and Gas Can Be Gained?

Ironically, the amount of oil and gas resources under these wild places is relatively small and will do little if anything to help meet the nation's energy needs. Based on The Wilderness Society's analysis of U.S. Geological Survey data, the 15 new BLM National Monuments contain a 15-day supply of oil and a 7-day supply of gas to meet the nation's consumption needs. The roadless areas in the National Forests located in the Rocky Mountain states contain only .4 percent (four-tenths of one percent) of the total U.S. oil resources (on and off shore) and only .6 percent (six-tenths of one percent) of total U.S. gas resources. Even the Arctic Coastal Plain would provide little relief. According to the U.S. Geologic Survey, an estimated six months supply of oil for the nation is thought to be within the Arctic National Wildlife Refuge.

Abundant Access Has Led to Abundant Development

Extensive oil and gas exploration is currently occurring on our public lands without the need to open new areas or weaken environmental protections. In fact, the vast majority of public lands managed by the Bureau of Land Management in the Rocky Mountain states—95 percent to be precise—is open to drilling. The oil and gas industry has taken full advantage of this access with widespread exploration and development activities. The industry has been eyeing Montana's Rocky Mountain Front for decades, going so far as to

sue the Forest Service in an attempt to overturn a 1997 decision to protect the area from energy development. There are more than 55,000 oil- and gas-producing wells on the public lands, and thousands of drilling permits are issued each year. (For example, the BLM issued more than 3,400 new drilling permits last year.) All of this drilling on BLM lands accounts for 11 percent of the nation's natural gas supply.

State	Acres open to drilling	Acres not open to drilling
Colorado	16 million	600,000 (3.5 percent)
Montana	18 million	400,000 (2 percent)
New Mexico	28 million	1.3 million (4 percent)
Utah	20 million	3 million (12 percent)
Wyoming	28 million	700,000 (2.5 percent)

The same is true in the Far North as well. The vast majority of the Arctic Coastal Plain is available for oil and gas drilling. Indeed, Phillips Petroleum recently announced what it considers a major oil find in the eastern portion of the National Petroleum Reserve Area, located in northwestern and north-central Arctic Alaska. Nonetheless, the Bush administration and its allies in the energy industry are demanding that the heart of the Arctic National Wildlife Refuge be opened to oil drilling.

What Is the Environmental Cost of All This Development?

Energy corporations like to talk about environmentally friendly drilling. They speak of "small footprints" and paint a public relations picture of wildlife frolicking among the development. Advocates of drilling may attempt to claim a small "footprint"—just 2,000 acres—but using that logic, the "footprint" of the sprawling New Jersey Turnpike is less than that at some 1,800 acres! The truth is, full-field oil and gas development entails hundreds of miles of pipelines and roads; production facilities, airstrips, and ports; and housing and sewage treatment for hundreds of workers. Besides the direct impact of this industrialization on the landscape, such facilities with their associated noise, water, and light pollution can also have a much larger impact "footprint" by displacing wildlife and recreationalists over a far greater area.

- According to the Alaska Department of Environmental Conservation, oil companies on Alaska's North Slope emit more than a spill a day of oil and other toxic substances, while emissions of some air pollutants are twice as much as occur in a major city such as Washington, DC.
- On April 15, 2001, Phillips Petroleum spilled more than 92,000 gallons of saltwater and crude oil on Alaska's North Slope.
- In a span of some six weeks, British Petroleum was responsible for three major spills of between 3,000 and 18,000 gallons of oil and drilling fluids. Last year, BP Amoco pled guilty to illegally dumping hazardous waste at the supposedly benign Endicott oil field near Prudhoe Bay and was fined \$22 million.
- ExxonMobil was ordered in the spring of 2001 to pay one billion dollars in damages for contaminating 33 acres of land in Louisiana with toxic material. (*Wall Street Journal*, May 23, 2001)
- "A 1987 study performed by the Wyoming Game and Fish Dept. in the Upper Green River Basin found that for every acre covered by oil and gas wells and drilling pads, 97 acres of winter range were abandoned by elk."

Drilling operations have other impacts as well. One method known as coal bed methane gas release, involves pumping enormous amounts of ground water to the surface, as much as 40,000 gallons a day per well. The discharge of ground water can deplete freshwater aquifers, lower the water table, and dry up drinking water wells.

In addition, not only does oil and gas development

require the construction of towers and pumps, oil companies also scrape the land clear of vegetation in the area surrounding the drilling equipment, construct miles of pipelines, grade a dense spider web of roads, dig large waste pits, and install numerous large tanks.

What Americans Are Saying

National and regional polls over the last few months repeatedly find that the American public overwhelmingly opposes drilling for oil and gas in the nation's wildest lands.

- According to a Zogby poll (June 24-26, 2001) only 37 percent of respondents approve of the way the president is handling energy issues.
- A *New York Times*/CBS News poll (June 14-18, 2001) found that 68 percent of those surveyed support conservation over increased drilling.
- A poll conducted by the *Los Angeles Times* (April 30, 2001) found that a 57 to 32 percent majority oppose the Bush administration's plans to carry out more oil and gas drilling in the northern Rocky Mountains as a means of boosting the nation's energy supply.
- A bipartisan poll conducted by Greenberg Quinlan Research and the Tarrance Group for the League of Conservation Voters (June 20, 2001) showed that 62 percent oppose opening the Arctic National Wildlife Refuge to drilling and 53 percent oppose opening the Rocky Mountain Front.

Responsible Alternative

President Bush is willing to trade a few days of oil and gas for a lifetime of wildland benefits for current and future generations. The Wilderness Society urges the Bush administration to restore some balance to their misguided energy proposal and not undercut protections afforded the last of our pristine wildlands. The Wilderness Society pledges to ensure that the great spaces and rich history of our nation encompassed by these spectacular wilderness lands remain intact and preserved from the threats that exploit their finite resources.

We can meet the nation's energy needs without destroying America's special wild areas. Rather than giving in to pressure from the oil, coal, and electric utilities lobbies, President Bush should lead the nation toward a cleaner, healthier, more secure energy future.

Arctic National Wildlife Refuge, Alaska



Wilderness Values

There is no other place on earth quite like the rolling tundra, rugged Brooks Range, boreal forests, coastal lagoons and barrier islands of the 19.6 million-acre Arctic National Wildlife Refuge in northeastern Alaska. Within the refuge, the 1.5-million-acre coastal plain is often referred to as "America's Serengeti" and like its African counter-part, it sustains an immense herd of large migratory mammals. The 130,000-strong Porcupine caribou herd uses the coastal plain of the refuge as its annual calving grounds, traveling hundreds of miles from wintering grounds in Canada and the U.S. More than 200 animal species, including polar and grizzly bears, wolves, muskoxen, and millions of migratory birds also dwell within the coastal plain.

Until now, the coastal plain of the refuge has remained virtually free of any human development enabling this very special land to continue to exist as it has for millennia, like almost no other region of the United States today. This nursery ground for caribou and other wildlife is sacred to the Gwich'in people—a nation of 7,000 Athabascan Indians who live in a village near the refuge. Caribou are at the center of the Gwich'in culture.

"Oil development in the birthplace and nursery grounds of the porcupine Caribou Herd would hurt the caribou and threaten the future of Gwich'in," said Sarah James of the Gwich'in Steering Committee.

The U.S. Fish and Wildlife Service has called the refuge's Coastal Plain "the center for wildlife activity" for the entire refuge. ■

Status

In 1960, President Dwight D. Eisenhower created what was then called the Arctic National Wildlife Range to preserve the area's "unique wildlife, wilderness, and recreational values." Twenty years later, Congress expanded the refuge as part of the Alaska National Interest Lands Conservation Act. The act also directed studies of the refuge coastal plain's wilderness, wildlife, and its oil and gas reserves. It prohibited oil and gas development without a further act of Congress. ■

Threats to the Refuge

Since the late 1980s, the oil industry and its allies in Congress have tried to pass legislation that would open the coastal plain of the Arctic Refuge to drilling. In 1995 Congress passed a massive budget bill that included a coastal plain drilling provision, but former President Clinton vetoed it, citing his objection to the drilling scheme. Despite surveys that show a solid majority of Americans oppose drilling in the refuge, President Bush has repeatedly stated his desire to open this treasured land to development and he has made drilling there the centerpiece of his national energy strategy.

On July 17th, the House of Representatives Resources Committee passed the "Energy Security Act" (HR 2436) that would mandate oil drilling in the Arctic National Wildlife Refuge. The bill, sponsored by Committee Chairman Jim Hansen (R-UT), would allow oil and gas leasing in the biological heart of the Arctic National Wildlife Refuge. It could come to the House floor for a vote before the August congressional recess. If it does, it would mark the first time in more than 20 years that a vote on drilling in the Arctic Refuge has taken place in the House of Representatives.

The Wilderness Society believes if the bill does go to the House floor for a vote, there will be strong bipartisan support to protect the refuge. In addition to the "Energy Security Act," two other bills have been introduced to open the Refuge to oil drilling—in the House, Rep. Don Young (D-AK) has introduced H.R. 39 and in the Senate, Sen. Frank Murkowski (R-AK) has introduced (S. 388). ■

Oil and Gas Development

According to a 1998 report from the U.S. Geological Survey, the mean estimate for the amount of oil that could be economically recovered from beneath the refuge at projected oil prices is 3.2 billion barrels—less than what the U.S. consumes in six months. At no time would oil from the refuge be expected to supply more than two percent of America's demand. None of this oil could reach consumers for at least 10 years.

The USGS' mean estimate for technically recoverable natural gas from the refuge is 7 trillion cubic feet—about what the U.S. consumes in four months. None of this gas was projected to be economically recoverable. By comparison, the National Petroleum Council estimated a natural gas resource base in the lower-48 states of 1,466 trillion cubic feet. Even after subtracting gas estimated to occur in federal land areas that are protected from drilling, this is enough gas to meet America's estimated needs for 40 years.

The oil industry claims it can develop the Arctic Refuge in an "environmentally sensitive" manner and points to its history in Prudhoe Bay. But according to the Alaska Department of Environmental Conservation, oil companies emit more than a spill a day of oil and other toxic substances, and emissions of some air pollutants are twice as much as those found in Washington, D.C.

Oil or gas development in the Arctic Refuge would forever destroy this treasured land as wilderness with hundreds of miles of roads and pipelines, oil and other toxic spills, and the construction of infrastructure for thousands of workers. ■

For More Information

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- Allen Smith
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The Wilderness Society
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- Adam Kolton
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202-544-5205

California Coastal National Monument

California



Wilderness Values

The California Coastal National Monument runs the entire length of California's beautiful, jagged coastline stretching 840 miles from Oregon to Mexico. It begins just offshore and ends at the boundary between the continental shelf and the continental slope. It includes all of the publicly owned islands, rocks, exposed reefs, and pinnacles above the high water mark.

The California Coastal National Monument is considered to be a biological treasure because geological formations created by constant, pounding wave action have created a wide range of rich and diverse habitats. Upwelling currents and freshwater inflows infuse the ecosystem with nutrients, resulting in the creation of an ecosystem that supports diverse habitats and a multitude of plant and animal species.

Development of the mainland, however, has forced seabirds that once fed and nested in the shoreline ecosystem to retreat farther from the coast. As a result, the monument is now an important feeding and nesting habitat for an estimated 200,000 seabirds, including the endangered California least tern, the threatened brown pelican, and the snowy plover. Bald eagles and peregrine falcons are also found within the monument. The coast also contains forage and breeding habitat for several marine mammals such as the threatened southern sea otter, harbor seals, sea lions, and elephant seals.

Because the monument is rich in biodiversity and particularly sensitive to disturbance, it should be protected from further pollution and industrial development. ■

Status

The concept for a California Coastal National Monument was discussed during an ocean summit organized by the Clinton administration in Monterey, California. Subsequently, while visiting Grand Canyon National Park last year, former President Bill Clinton declared the California coastline a national monument on January 11th, 2000. ■

Why is the Monument Threatened?

While the threat to the monument from the Bush administration's energy policy is real, fortunately there is strong, bipartisan opposition to increased drilling off the California coast. Nonetheless, the administration's energy proposals consider drilling in recently created national monuments, including those in California, a state that is facing an energy shortage. In addition, although there is currently a moratorium on new oil-drilling leases in federal waters off the coast of California, the Bush administration's energy plan recommends the review of all laws related to off-shore drilling. That would include the moratorium that protects waters off the California coast.

An existing management plan would have to be changed through a public comment process to open the monument to oil and gas exploration. However, there is strong bipartisan opposition to additional drilling off the coast of California. Near-shore operations within the national monument will face a steep, uphill battle should any activity in the monument be proposed. ■

"The California Coastal National Monument is located, quite literally, at the edge of the continent. It is a dramatic and dynamic landscape that supports a unique marine ecosystem as well as an entire coastal economy," said Jay Watson, California/Nevada Regional Director for The Wilderness Society. "The California Coastal monument in large part defines the coastal state. It must remain fully protected."

Carrizo Plain National Monument, California



Wilderness Values

Just west of California's Temblor Range, the remote basin of the Carrizo Plain National Monument rolls out like a carpet of grass extending as far as the eye can see. It is the last large remnant of native grassland that once covered the San Joaquin Valley. The 18,000-acre Caliente Mountain Wilderness Study Area is within the boundaries of the monument.

Visitors often describe the Carrizo Plain as a place frozen in time. The arid and treeless grassland valley is the largest remaining example of the type of wildland that once sprawled across the San Joaquin Valley centuries ago—land that has been largely eliminated by agricultural, urban, and industrial development.

The Carrizo Plain is home to the largest concentration of endangered wildlife in all of California—a total of 13 plant and

animal species have been state or federally listed as endangered. These rare species include the San Joaquin kit fox, the blunt-nosed leopard lizard, the California condor, and the California jewel flower. Other large mammals within the monument include pronghorn antelope and tule elk. These two magnificent animals were almost totally eliminated in the region by uncontrolled hunting during the last century. They have started to thrive in the Carrizo Plain once again following successful reintroduction programs.

The monument also contains Soda Lake—one of the largest undisturbed wetlands in California, providing an important habitat for migratory birds, including one-quarter of the state's wintering sandhill crane population. It was designated a national monument in January of this year and deserves protection from further exploitation. ■

Status

President Bill Clinton declared the Carrizo Plain a National Monument on January 17, 2001. The President acted only after legislation that would have established a national conservation area failed to move in Congress. The key sticking point was whether the bill should withdraw the area from oil and gas exploration. ■

“We will definitely look back at the Carrizo Plain National Monument someday and see how forward-thinking it was to set these places aside,” said Irv McMillen, a rancher near the Carrizo Plain. “In time, we will be remembered for what we save, not what we exploit.”

Why is the Monument Threatened?

Although drilling in the Carrizo Plain would produce miniscule amounts of oil and gas, and exploiting the area would not reduce prices or halt California's rolling blackouts, the Bush administration's energy plan nevertheless calls for drilling in newly created national monuments, particularly in California. Secretary of the Interior Gale Norton recently stated that the Bush administration would be looking at “all public lands,” including national monuments, for new sources of energy. Such a policy could lead to opening up the Carrizo Plain to oil and gas exploration and other forms of development.

A management plan already exists for the Carrizo Plain that requires the BLM to review any proposed leasing against the conservation purposes of the Carrizo Plain. To reduce the importance of land and resource conservation in the area, this plan would have to be amended through a public comment process. ■

Oil and Gas Development

According to The Wilderness Society analysis of data obtained from the United States Geological Survey (USGS) 1995 National Assessment of United States Oil and Gas Resources, the total amount of economically recoverable oil in the Carrizo Plain would equal just two days of U.S. national oil consumption. The same analysis reveals that there is just 19 hours' worth of economically recoverable natural gas in the monument.

Current oil and gas operations within the area are economically marginal. In 1998, more than 22.5 million barrels of oil were produced from BLM leases within the jurisdiction of the Bakersfield field office; the contribution of the Carrizo Plain to this total was negligible. There are 17 active oil and gas leases within the Carrizo Plain, only four of which are currently producing. ■

Take Action

People interested in seeing the Carrizo Plain stay free of oil and gas wells should write Secretary of the Interior Gale Norton, U.S. Department of the Interior, 1849 C Street, NW, Washington DC, 20240. ■

For More Information

■ Jay Watson
California/Nevada Regional Director
The Wilderness Society
415-518-2604

San Juan National Forest Roadless Areas, Colorado



Wilderness Values

The San Juan Mountains of southwestern Colorado comprise the wildest region of the Southern Rockies. The place of the last recorded sighting of grizzly bear in Colorado, the San Juan National Forest contains Colorado's largest wilderness area, the awesome 500,000-acre Weminuche Wilderness, as well as an additional 550,000 acres of spectacular unprotected roadless lands.

Located 25 miles east of Durango, the 34,845-acre HD Mountains Roadless Area is the largest roadless tract of oak-brush and pinyon-juniper forests in the San Juan National Forest. The area also has some of the highest-quality old-growth ponderosa pine in Colorado—the most underrepresented ecosystem type in the Rocky Mountain region's wilderness system. HD Mountains also provides a landscape linkage to tribal forests of the Southern Utes and Jicarilla Apaches and portions of the Carson National Forest in New Mexico.

At 150,000 acres, the Hermosa Roadless Area north of Durango is the largest remaining unprotected roadless area on the San Juan National Forest. Hermosa provides an important roadless habitat corridor between the Animas Valley across the

LaPlata Mountains to the Dolores Valley. The area contains the most diverse forest habitats on the entire San Juan NF, harboring superb examples of old-growth ponderosa pine stands as well as thriving populations of Colorado River cut-throat trout. The nearby 59,738-acre San Miguel Roadless Area offers outstanding backcountry recreation and solitude in one of the most spectacular settings in Colorado. As a key link of old growth- and mature-spruce-fir-forests across the San Juan landscape, San Miguel connects the Weminuche and Lizard Head wilderness areas, providing both essential wildlife habitat and abundant hiking opportunities on its generous network of trails.

"The roadless areas of the San Juan National Forest are some of the largest and wildest unprotected wildlands in Colorado," says Mark Pearson, director of the San Juan Citizens Alliance in Durango. "Rather than destroy the wild character of some of our most scenic and biologically rich forest wildlands for a miniscule amount of potential oil and gas, they should be protected for their higher values as watersheds, wildlife habitat, and places of solitude and recreation." ■

Status

The U.S. Forest Service's Roadless Area Conservation Rule, adopted on January 12, 2001, protects 58.5 million acres of inventoried roadless areas on National Forest lands nationwide, including 4.4 million acres in Colorado, from road building and most logging. The policy also prohibits all new oil and gas leases on these wildlands. (It does not, however, limit public access to roadless lands for recreation nor does it close any existing roads.)

Scheduled for March 13, 2001, 60 days after it was published in the *Federal Register*, the rule's implementation was delayed another 60 days by the Bush administration, which claimed that it needed additional time for review. Subsequently, in March 2001, as defendants in two Idaho district court roadless rule cases, the administration failed to defend the rule's merits. This inaction paved the way for a preliminary injunction against its implementation by a U.S. District Court judge in Boise, Idaho; this injunction is cur-

rently being appealed to the U.S. Court of Appeals for the Ninth Circuit.

Meanwhile, the Bush administration has initiated another public comment period on the roadless rule even though prior to the rule's adoption the Forest Service undertook nearly three years of research and analysis including extensive public involvement. The agency held more than 600 public meetings nationwide, including 27 in Colorado, and received more than 1.6 million public comments, including more than 28,000 from Coloradans. The majority of comments nationwide, and 92 percent of those from Colorado, supported the roadless rule or urged even stronger protection than the rule would provide. In addition, a statewide poll taken in March 2000 indicated that 75 percent of Coloradans supported a roadless policy that "would allow most types of recreational use in the National Forests...but prohibit logging, new roads, mining, oil drilling and off-road vehicles." ■

Why is the Rocky Mountain Front Threatened?

A major threat to the pristine quality of San Juan NF roadless areas is oil and gas leasing and development, particularly coal-bed methane development. Destruction of watersheds and water quality for communities dependent on National Forest roadless areas is a major environmental cost of coal-bed methane development. To release coal-bed methane from inside coal beds, enormous amounts of overlying water must be pumped and injected into the coal beds, which can lower water tables and adversely affect drinking wells. Gas seepage can also contaminate aquifers and

destroy large swaths of vegetation. Dewatered coal seams may cause fire bursts that can't be extinguished.

Far beyond the actual drilling sites, oil and gas resource development in roadless areas leaves behind large footprints of roads, pipelines, and drill pads. Scars from road systems required by transport trucks carrying survey and drilling equipment remain long after even exploration of an area.

Implementation of the roadless rule would preclude much of this new destruction because new leases could not be issued and new roads could not be constructed to access these areas. ■

Oil and Gas Potential

The National Forest System provides relatively little of our nation's petroleum resources. In 1999, the National Forest System produced just 0.4 percent of the nation's gas supply. Nationwide, 759,000 roadless acres with high oil and gas potential are already under existing leases and not subject to the prohibitions under the roadless rule. Leasing in other roadless areas for oil and gas has been available for decades, but the industry has demonstrated little interest in exploiting potential energy resources in these remote wildlands. Clearly, the areas with the highest oil and gas potential have already been leased. ■

Take Action

By their recent legal, administrative, and policy maneuvers, the Bush administration appears intent on dismantling the roadless area policy and the protections it affords our National Forest wildlands. With such revocation, the HD Mountains, Hermosa, and San Miguel roadless areas, as well as dozens of other splendid wildlands on the San Juan National Forest, could be commercially logged, roaded, and opened up to oil and gas development.

Please write the Forest Service in support of the Roadless Area Conservation Rule by September 10, 2001. Send comments to: USDA-Forest Service—CAT, Attention: Roadless ANPR Comments, P.O. Box 221090, Salt Lake City, Utah 84122; via electronic mail to roadless_anpr@fs.fed.us; or via facsimile to 1-801-296-4090, Attention: Roadless ANPR Comments ■

Oil and Gas Development

The Forest Service leased 6,000 additional acres in and around the HD Mountains in May 2001 and industry submitted plans to the Forest Service to drill up to 200 new coal-bed methane wells on the San Juan National Forest, including more than 100 inside the HD Mountains Roadless Area. Potentially, four wells could be drilled per section, with associated roads, pipelines, and power lines scarring the landscape. This could result in 100-200 new wells within the roadless area, essentially obliterating it.

The May lease auction indicated industry's strong interest in development; one Oklahoma company bid a half-million dollars extra just to ensure that it obtained the lease rights for a single 1,000-acre lease.

Besides this imminent threat to the HD Mountains Roadless Area, both Hermosa and San Miguel roadless areas have underlying sedimentary formations and are shown on maps of potential oil and gas reserves. The Bush administration's energy policy encourages oil and gas drilling on our public lands, making these and other San Juan roadless areas especially vulnerable. ■

For More Information

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- Michael Francis
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202-429-2662
- Kate Fielder
Roadless Forests Campaign, The Wilderness Society
202-429-2675

Vermillion Basin, Colorado



Wilderness Values

In Colorado's wild canyon country you can gaze across panoramic vistas of glowing redrock, discover hidden canyons, and walk for miles across windswept plateaus of ancient piñons and gnarled junipers. It is here that native civilizations etched into rock the sacred symbols of their cultures. It is in this country that coyotes howl, eagles soar, and elk calve. Vermillion Basin, in the northwest corner of the state, embodies this wild and rugged landscape—with its vividly colored badlands, rich archaeological history, and large number of rare plant species and communities.

Lookout Mountain and the adjacent Vermillion Bluffs rise up in a dramatic 1,700-foot escarpment, gracing visitors with views encompassing much of northwest Colorado. Below, Vermillion Basin stretches out in a vast, undulating, rainbow-colored basin, transected by a stunning desert canyon that has cut through the sandstone layers, shaping and breaking the soft sediments. Vermillion Canyon is spectacular, with desert varnish, sculpted sandstone, and a steep crumbling cliff rising more than 1,000 feet.

"Special places like Vermillion Basin should be protected as wilderness, not sacrificed for oil and gas development," says Claire McCullough, a Grand Junction resident and Public-at-Large representative on the Bureau of Land Management's (BLM) Northwest Resource Advisory Council, who participated in the BLM's wilderness review of Vermillion Basin. "The roads, pipelines, and drill pads associated with oil and gas development would irreversibly destroy the wild character of this spectacular landscape to the detriment of wildlife populations, backcountry enthusiasts, and the area's rich cultural heritage." ■

Status

Citizen conservation groups have been calling for increased protection for BLM wildlands ever since the BLM released its initial Colorado wilderness inventory back in 1980. At that time, the BLM found only 800,000 acres—out of its 8 million acres—as worthy of further wilderness study and interim protection. Because the agency overlooked key areas, conservationists conducted their own inventory. In 1994, 48 conservation groups, including The Wilderness Society and Colorado Environmental Coalition, first published the Colorado Citizens' Wilderness Proposal recommending an additional 276,000 acres of BLM land for wilderness protection (as well as some adjacent national forest lands) on Colorado's West Slope. Conservation groups requested that the BLM protect these citizen-proposed wildlands from damaging development—in particular oil and gas leasing—until Congress could consider them for wilderness designation. In response, the Colorado BLM adopted a policy to review citizen-proposed wilderness areas as needed before it allowed any "irretrievable or irreversible" activities that could destroy wilderness values.

Since then, Colorado conservationists have formed the Colorado Wilderness Network (CWN), which has grown to a coalition of more than 280 conservation, recreation, religious, and civic organizations including more than 150 businesses within Colorado. The CWN has built upon the Colorado Citizens' Wilderness Proposal and is now working to protect roughly 1.5 million acres of BLM and adjacent Forest Service land. Representatives Diana DeGette (D-CO-1) and Mark Udall (D-CO-2) have introduced the bulk of the network's wilderness proposal as congressional legislation. ■

Why Is Vermillion Basin Threatened?

Land stretching to the north and east of Vermillion Basin have largely been leased for oil and gas development, and indeed driving along the Colorado/Wyoming border north of Vermillion you will see numerous drill pads where development has already occurred. However, except for its northeast corner, Vermillion Basin, as well as the adjacent Cold Spring Mountain proposed wilderness, is otherwise unleased and represents an oasis of wildness in a landscape otherwise slated for oil and gas development. Unfortunately,

the industry wants to lease and drill Vermillion Basin too.

In 1996, Marathon Oil, a Houston-based firm, requested that the BLM make certain areas in northwest Colorado available for lease. The BLM initially agreed to offer the areas for lease; however, just days before the proposed lease sale, the BLM "discovered" that some areas proposed for lease were within the Vermillion Basin citizen-proposed wilderness. The BLM informed Marathon Oil that it could not lease the areas;

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Why Is Vermillion Basin Threatened?

consequently, Marathon protested the decision. In response, conservationists urged the BLM to reject Marathon Oil's protest, which it did, arguing that it was within the agency's discretion not to lease the area and to review the area's wilderness character before proceeding with any leasing. Marathon Oil filed suit against the BLM in January 1997, claiming that the agency did not have the discretion to withhold leasing in areas where existing management plans allowed it. The U.S. District Court for Colorado ruled against Marathon Oil and in favor of the BLM's authority to make such management decisions. Marathon is appealing the case.

Meanwhile, the BLM has undertaken a wilderness review of Vermillion Basin and released its final findings in June 2001. In

a vindication of what citizens have been claiming for years, the BLM found that 77,067 acres out of Vermillion's 81,028 total acres (or 95 percent) have wilderness characteristics. This conclusion sets the stage for the BLM to initiate a process to amend the area's resource management plan, during which time the public can weigh in on whether Vermillion Basin should be given interim protection (until Congress decides on wilderness designation) or should be opened for oil and gas development. Given the Bush administration's statements about removing impediments to oil and gas drilling on BLM lands, this public process—if it is allowed to occur at all—may have a predetermined conclusion to open Vermillion Basin to drilling, despite its outstanding wilderness character. ■

Oil and Gas Development

Approximately 3,885 acres within the northeast corner of Vermillion Basin is covered by oil and gas leases, although none of the leases has been developed. More recently, however, Marathon Oil has filed a request for leasing roughly 2,000 acres (not all within the Citizen's Proposal) in the northwest corner of Vermillion, in a contested area where the BLM disagreed with conservationists and found the area to lack sufficient wilderness character. Despite CWN's protest of this latest lease sale, the BLM is proceeding with the sale in August.

In addition, the Bush administration could overturn the Colorado BLM's policy requiring the agency to conduct wilderness reviews of citizen-proposed wilderness before allowing oil and gas leasing. Not only could this undermine the ongoing Vermillion Basin wilderness review, it could also immediately open up more than half a million acres of other citizen-proposed wilderness areas across Colorado to oil and gas exploration. ■

Take Action

The BLM will soon be initiating a public decision-making process to amend its management plan for Vermillion Basin. During this planning process, the fate of the Vermillion Basin proposed wilderness will be decided, including whether the area will be protected from oil and gas development or not. There will be many opportunities for public participation once this two-year process gets underway, and all concerned citizens should make their voices heard.

Additionally, citizens should support a "look before you lease" policy for the BLM to ensure that citizen-proposed wilderness lands, many of them overlooked by the BLM in its original inventories, are reviewed for their wilderness values before irreversible development is allowed.

Ultimately, however, the solution to preserving wilderness-quality lands in Colorado is legislative passage of the Citizens' Wilderness Proposal, which would protect more than 1.5 million acres of Colorado's canyon country. ■

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Rocky Mountain Front, Montana



Wilderness Values

A land of spectacular mountains towering over rolling plains and sparkling rivers, the Rocky Mountain Front is where the short-grass prairies of the plains slam into the mountains in northwestern Montana. An integral part of the 5-million-acre Glacier National Park/Bob Marshall Wilderness ecosystem, the "Front" is part of one of the largest and most intact wild ecosystems in the United States. In the north, the Rocky Mountain Front includes the 200-square-mile Badger-Two Medicine portion of the Lewis and Clark National Forest. This area is directly adjacent to Glacier National Park and is sacred ground to the Blackfoot Tribe. South of the Badger-Two, the Front includes a 400-square-mile strip of national forest land and about 20 square miles of Bureau of Land Management (BLM) lands, including three BLM "Outstanding Natural Areas."

The intersection of mountain and grassland found in the 100-mile-long Front produce habitat so rich that it is often called "America's Serengeti." Indeed, not only does the Front still retain almost its entire native species (only bison are missing); it also harbors the country's largest bighorn sheep herd and second largest elk herd. The Rocky Mountain Front supports the largest number of grizzly bears south of Canada and is the only place in the lower 48 states where grizzly bears still roam from the mountains to their historic range on the plains. Threatened and endangered species like lynx, wolves, and wolverines are also found on the Front, as are mule deer, antelope, mountain goats, badgers, and mountain lions. ■

Status

With such exceptional habitat and with world-renowned hunting and fishing opportunities, sportsmen, hikers, land managers, and others have worked for many decades to preserve the Front's wildlife legacy. The Sun River Game Refuge was established in 1913 to protect elk winter range, the first of several state wildlife areas in the region that sportsmen have secured. More recently, private conservation groups like The Nature Conservancy have protected critical parcels along the Front.

Building upon this significant public and private conservation investment and following an extensive public comment process, the Lewis and Clark National Forest decided in 1997 to withdraw for 15 years 356,000 acres in the Front from any new oil and gas leasing. While this withdrawal did not affect valid existing leases, several industry trade groups still sued in federal court to overturn the decision but were ultimately unsuccessful.

Almost the entire Front is "inventoried roadless area" that would be protected from road construction under the "roadless rule." However, with the rule in court and the Bush administration backtracking from the policy, it is unclear how much protection the roadless rule will provide the Front. ■

Why is the Rocky Mountain Front Threatened?

Industry has a long-standing interest in drilling in the Front and over the past several decades has acquired numerous leases in the area. In the Badger-Two Medicine portion of the front, there are almost 50 leases covering 80,000 of its 128,000 acres. These leases are currently suspended pending completion of a study of the area's cultural and historical significance. Once this study is completed, the administration could allow drilling here.

Elsewhere on the Front, there are several places where industry holds leases that are under temporary suspension

pending additional environmental review or because of legal challenges. Yet, the threat of development remains very real. For example, in the Blackleaf area of the Front, a Canadian company is seeking to drill in the BLM's Blindhorse Outstanding Natural Area. This would require ferrying 100 semi-truck loads of drilling equipment three miles and 2,000 vertical feet up a primitive road.

In addition, there is a real concern that the Bush adminis-

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Why is the Rocky Mountain Front Threatened?

tration will attempt to undo the withdrawal that the Lewis and Clark Forest put in place in 1997. Such an action is alluded to in the administration's Energy Plan with its emphasis on increasing exploration on public lands and reviewing all administratively withdrawn public lands.

The Front is also threatened because Montana's Governor, Congressmen, and Republican Senator have supported open-

ing it to oil and gas development. Only Montana Senator Max Baucus has defended the Front. In a recent letter to Interior Secretary Gale Norton he wrote, "Opening the Front to oil and gas exploration could result in irreversible impacts to this beautiful yet fragile area that Montanans care deeply about....An unnecessary invasion of the Front for short-term gain is not the answer to our long-term energy needs." ■

Oil and Gas Development

While industry likes to cite a 1989 U.S. Geological Survey study that gives a 50 percent chance of finding 2.5 trillion cubic feet of natural gas in the Montana Overthrust Belt (a much larger area than the Front that includes Glacier National Park and the Bob Marshall Wilderness), much of this gas is not economically recoverable. Furthermore, in 1995, the U.S. Geological Survey revised its estimate downward to just 1.8 trillion cubic feet of natural gas-enough to meet the U.S. demand for less than a month. ■

Take Action

Concerned citizens should contact the administration and their congressional representatives urging that the current leasing withdrawal for the Front be honored. ■

Public Support for Protection

It is clear that the public adamantly opposes any oil and gas activity in the Rocky Mountain Front. A *Great Falls Tribune* poll in 1997 found that Montanans by a 2 to 1 margin want to see the Front protected from oil and gas development. In addition, more than 80 percent of the 1,500 public comments the Forest Service received supported its 1997 no leasing decision. As well, the Blackfeet Tribal Council has passed a resolution opposing any drilling in the Badger-Two Medicine portion of the Front.

Numerous local and regional papers have recommended that no drilling be allowed in the Rocky Mountain Front. For example, the *Missoulian* recently editorialized, "Anyone who gazes at the Front, even from afar, must have some notion of why so many care so deeply about it. It is here, where the Rocky Mountains spill onto the Parries and amid the elk, bighorns, grizzlies, and other wildlife, that you discover the soul of Montana. There are people that would drill holes in that soul! And to them we say this: not even if this were the last place on earth left to drill." ■

For More Information

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- Gene Sentz
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406-466-2750

- Mark Good
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- Dave Dittloff
Montana Wildlife Federation
406-458-0227

Upper Missouri River Breaks National Monument, Montana



Wilderness Values

A land of beautiful rock formations, magnificent cliffs, and wide-open prairie scenery, the Upper Missouri River Breaks National Monument protects a remnant of the Great Plains that possesses a rare blend of natural, historical, and cultural attributes. Located in central Montana, the monument's upstream, western boundaries generally conform to those of the Missouri River (designated a Wild and Scenic River in 1976); downstream, the Monument area extends both north and south of the river to include six Bureau of Land Management (BLM) Wilderness Study Areas, the rugged Bullwhacker Coulee area, and several other wild places. At its eastern edge, the Breaks Monument connects to the Charles M. Russell National Wildlife Refuge. In total, the Monument encompasses 377,346 acres of federal land, with approximately 120,000 acres of interspersed state and private lands.

The river banks and upland breaks of the Upper Missouri River Breaks Monument provide essential, unfragmented habitat for more than 60 mammal species, 230 types of birds, and

20 species of amphibians. Mule deer, as well as sharp-tailed grouse, are abundant on the slopes and in the coulees, while the rolling areas above the river bottoms provide important habitat for antelope and grouse. In the Monument's eastern section, elk and bighorn sheep are found. Many raptors, including eagles, prairie falcons, and hawks, perch and nest in the cliffs above the river.

Besides providing rich wildlife habitat and wilderness, the Monument includes recreational opportunities of utmost public value and allows visitors to experience a remarkable western landscape as it was seen and experienced by Lewis and Clark, native plains tribes, fur trappers, and steamboat captains. The Monument includes segments of the Lewis and Clark National Historic Trail, which follows the river, and the Chief Joseph National Historic Trail, which traverses the area from south to north. One guidebook has described the Monument as follows: "a landscape of living history; a place where a profound appreciation of Montana's past is made possible by a largely undisturbed natural environment." ■

Status

Sportsmen, conservation organizations, ranchers, business owners, and other Montanans have worked for decades to protect this special part of the state. Following a visit from Secretary of the Interior Bruce Babbitt in August 1999, the Central Montana Resource Advisory Council was asked to work with fellow Montanans to explore options for protecting the Upper Missouri River Breaks country. While this group eventually agreed that the area should be kept unchanged, no consensus was ever reached on how to accomplish this. Montana's congressional delegation could also not come to agreement on how to protect this special area. So, on January 17, 2001, after two years of public meetings and hearings, President Clinton used his power under the Antiquities Act to create the new Upper Missouri River Breaks National Monument. The BLM was charged with creating an interim management plan for the new Monument that would address specific protection and use of its many resources. ■

Why is the Monument Threatened?

Today, the oil and gas industry is lobbying to explore within the Upper Missouri River Breaks Monument. This is despite the fact that the Monument's boundaries intentionally excluded the largest area with oil and gas potential and that the Monument's 60,000 acres under valid lease were specifically protected in Clinton's proclamation. Still, the Bush administration has shown an interest in supporting industry's wish, stating that it would be looking at "all public lands" for new sources of energy including the 15 BLM-managed National Monuments designated by President Clinton. Montana's Congressman and Republican Senator, both of whom opposed the creation of the Missouri Breaks Monument, have also been exploring ways to open it up to oil and gas activity, including possibly reducing the existing boundaries. On a positive note, Congress is expected to pass a budget bill that forbids any new leasing in the new monuments over the next fiscal year. ■

Oil and Gas Development

While north central Montana does contain significant natural gas fields, the Monument is unlikely to contain sizeable reserves. According to the U.S. Geological Survey, developing the Upper Missouri River Breaks Monument would supply the nation with just one hour's worth of oil and 15 hours of natural gas. Furthermore, according to the Montana Department of Natural Resources, of the 154 gas wells that have been drilled within the Monument area over the last 20 years, only 10 found any gas and just 2 reported production in the fourth quarter of 2000. ■

Public Support for Protection

Designating the Upper Missouri River Breaks a national monument has been widely supported by Montanans, including local business people, ranchers, sportsmen, and scientists. In a poll conducted last year by the *Great Falls Tribune*, 64 percent of Montana voters supported the Missouri Breaks Monument designation while only 26 percent opposed it. In addition, thousands of citizens expressed their endorsement at public meetings and hearings, and letters to the editor as well as editorials in local papers have issued calls for vigorous protection. One local rancher, Hugo Tureck, explained the cost of opening up the monument to oil and gas as follows: "It is an irreplaceable landscape in the history of our country—a landscape we must save for our children and grandchildren. It would be irresponsible to allow this special place to be developed and scarred by a shortsighted campaign that will do nothing to address the nation's energy situation." ■

Take Action

As the last, undeveloped section of one of America's greatest triumphs—the Lewis and Clark Expedition—it is imperative that the protections provided the Upper Missouri River country by monument designation not be weakened. Americans must demand that no additional oil and gas leasing be allowed in the Upper Missouri River Breaks Monument. Furthermore, Congress and the administration must ensure that the current boundaries remain unchanged, that strict protections are included in the final management plan for the Monument, and that adequate funding is allocated for management—including sufficient funding to acquire properties and leases from willing sellers within the Monument. ■

For More Information

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Otero Mesa Region, New Mexico



Wilderness Values

To first-time visitors, Otero Mesa may appear too hot and hostile to support much life. But biologists say the greater Otero Mesa region is one of the most important areas for wildlife in New Mexico. Blacktailed prairie dogs, Aplomado falcons, Ferruginous hawks, bobcats, and mountain lions can all be found here. It is also home to a unique pronghorn antelope herd that, unlike other herds, was not reintroduced to the region. Rather, these animals descended from native pronghorn herds over thousands of years.

Otero Mesa is still rich with wildlife because it is one of the wildest grasslands remaining in the state of New Mexico. It is one of the last places in the Southwest where people can see the unique grasslands of the Chihuahuan Desert. Because

it remains so wild, the Otero Mesa Region serves as an important migration corridor for many species of wildlife moving between the Sacramento Mountains (Lincoln National Forest) and Guadalupe Mountains (Carlsbad Caverns and Guadalupe Mountains National Park). A portion of the area includes the 31,000-acre Brokeoff Mountains Wilderness Study Area. Since 1987, citizens have proposed that the Brokeoff Mountains WSA and surrounding lands be designated as a 66,350-acre wilderness area to protect the land's wild character and prevent oil drilling, road construction, and other development. The citizen-proposed wilderness includes the Alkali Lakes area, which supports rare plants that are known to occur only here and in one other location in Texas. ■

Status

The Bureau of Land Management (BLM) has issued a draft Environmental Impact Statement (EIS) and Resource Management Plan (RMP) for the region. Conservation groups have been working to get the BLM to withdraw grassland areas from oil and gas development. Sadly, the current preferred alternative that the BLM has chosen fails to address the oil and gas problems—leaving almost 89 percent of the area open to drilling. While the BLM's preferred alternative is an improvement over the current management plan, which provides virtually no recognition of the area's many natural values, it calls for only modest protection in the form of stipulations on when companies can drill wells and leaves the vast majority of land in the region open to leasing and development. The citizen-proposed wilderness area surrounding the

Brokeoff Mountains WSA, for example, would, under the preferred alternative, mostly be open to oil and gas drilling with some limitations on timing of drilling activity and/or surface use. Local conservation groups have requested that the BLM, at the very least, prohibit new road construction if oil and gas drilling and development are allowed to continue. They are quick to point out that while this is not an ideal solution, limiting new drilling projects to the existing road system would prevent further habitat fragmentation and loss of the remaining roadless areas. Ideally, conservationists would like to see oil and gas drilling prohibited on the remaining roadless grasslands and permanent wilderness protection for lands that qualify. ■

“The thing that makes the Otero Mesa region great is its vast, unspoiled character and abundant wildlife. To bring in rigs, roads and power lines will take the heart out of this great wildland. Once again industrializing a piece of our wild heritage, with little public debate on the ultimate consequences.”

—Stephan Capra, New Mexico Wilderness Alliance

Why is the Otero Mesa Region Threatened?

Yates Petroleum, the largest oil company in the region, has one well in operation and holds a number of other leases that could be developed. The company continues to lobby the BLM to allow for large-scale development. George Yates, president of HEYCO (the parent company Yates Petroleum), in a recent *U.S. News and World Report* story, claimed that under current management they have been "unable to develop," but that they expect policy changes affecting these problems to come soon from the Bush administration.

Oil and gas development with its associated roads, well pads, power lines, and pipelines have devastated much of the area east of the greater Otero Mesa Region including Eddy County in the Indian Basin between Carlsbad and Artesia. Due to habitat loss and fragmentation, a local Eddy County herd of pronghorn that once numbered more than 300 head is now down to only 30. Much of the region where oil and gas development has occurred in Eddy County is regularly

engulfed in noxious and potentially dangerous gas fumes including hydrogen sulfide gas.

With the Bush administration pushing hard for more oil and gas development throughout the Rocky Mountain region, many fear that the remaining grasslands in the Otero Mesa Region will be sacrificed to meet the drilling expectations created by the Bush plan. Local lawmakers have endorsed the Bush drilling plan despite the recommendations of biologists that the region be protected. Conservationists fear that the Bush plan will roll back even the modest improvements purposed by the BLM for this region when the draft plan is made final. Some elected officials have already said that the BLM's current recommendations go too far. In a recent Albuquerque Journal article Rep. Heather Wilson (R-NM) criticized the BLM for considering even minimal protections for the region because of the biological concerns, saying, "Give me a break. We can drill responsibly on public lands." ■

Take Action

Please contact Tom Philips, BLM project manager for Oil and Gas Planning in Otero County, and ask him to close critical grasslands and other roadless areas in the Otero Mesa Region to oil and gas development.

- Tom Philips
Project Manager
Bureau of Land Management
1800 Marquess
Las Cruces NM 88005
Phone: 505-525-4300

For More Information

- Pam Eaton,
The Wilderness Society
303-650-5818: ext-103
- Michael Carroll
The Wilderness Support Center
970-247-8788
- Stephan Capra
The New Mexico Wilderness Alliance:
505-843-8696

Finger Lakes National Forest, New York



Wilderness Values

The Finger Lakes National Forest is a hidden jewel in the National Forest System. It is the only National Forest in New York State and part of very little federally owned land in all of New York. At approximately 16,000 acres, the Finger Lakes National Forest is one of the smallest national forests in the country. Despite its small size, it is a haven for both recreationists and rare birds.

It is located on the spine of the ridge between Cayuga and Seneca Lakes in the Finger Lakes region of upstate New York. Horseback riders and hikers enjoy the many trails, birdwatchers look for rare sightings, and anglers fish the small ponds. The area surrounding the National Forest also is home to a number of vineyards producing outstanding local wines.

Over the years, local citizens protested and succeeded in both saving it from the auction block and persuading Congress to make it a permanent part of the National Forest System. ■

Status

The Finger Lakes Land and Resource Management Plan (Forest Plan) allows for "leasing for gas exploration and development, in a way that is compatible with conserving surface resources and their uses." In 1998, natural gas companies approached the Forest Service to request leasing and surface occupancy for oil and gas exploration. That request prompted an Environmental Impact Statement (EIS) and analysis in order for the Forest Service and the Bureau of Land Management (BLM) to make a decision as to whether to permit leasing on the Finger Lakes NE. ■

Why is Finger Lakes National Forest Threatened?

Today, the Forest Service is considering whether to amend the Finger Lakes National Forest Plan and lease substantial portions of the forest for oil and gas development. A draft EIS has been issued and public comments about the proposal can be submitted to the Forest Service until August 1, 2001.

Due to the patchwork ownership patterns of the Forest, federal gas resources will be extracted one way or the other. A significant issue revolves around whether to allow surface occupancy of the Forest. In the absence of federal leases or royalty agreements the gas companies are free to drill on nearby private land and take the natural gas under the Forest without compensating the federal government in any way. All alternatives involve either leasing or royalty agreements. Rather than drill on public land, the leaseholder could use directional drilling from private land to access the natural gas that lies underneath the Finger Lakes National Forest without causing ground disturbance on public land. The draft EIS describes

alternatives allowing for leasing acreage ranging from 13,200 acres to all of the Forest's 16,036 acres, with varying proportions of surface occupancy allowed on up to 61 percent of the lease area.

The proposal has met with a great deal of controversy. Jesse Strock, one of the organizers of the Finger Lakes Forest Watch Congress, echoes the sentiments of many, "This gem of upstate New York should not be allowed to be exploited by a few oil and gas companies for their own benefit, leaving the public with the cost of road maintenance and a devastated forest." The Schuyler County Board and the Hector Town Selectboard (one of two counties and one of three towns in the project area) have both voted to officially oppose the project. In addition, Senator Charles Schumer (D-NY), Senator Hillary Rodham Clinton (D-NY), and Representative Maurice Hinchey (D-NY) have all recently expressed opposition to the project. ■

Oil and Gas Development

The Trenton-Black River layer exists under the Finger Lakes NF as well as most of the Southern Tier of New York State. Interest in the area by natural gas exploration companies has increased substantially in the last few years, as the industry estimates the overall area to contain 35 billion cubic feet of natural gas. The gas industry estimates 16 billion cubic feet are contained under the Finger Lakes National Forest. The Forest total would supply just 2.7 days of New York State's daily natural gas consumption. However, extraction would take place over a 25-year cycle with leases lasting anywhere from 18-40 years. ■

Take Action

The Wilderness Society opposes leasing and surface occupancy of the Finger Lakes National Forest. Given the opportunities for drilling on private land there is no reason to destroy the natural beauty and ecosystem health of the Forest by turning it into a patchwork of derricks, well heads, and pipelines. The Forest Service is taking comments on the draft EIS until August 1st, 2001.

Write to the Forest Service at the Finger Lakes National Forest, attention Oil and Gas DEIS Comments, 5218 State Road 414, Hector, NY 14841, and tell them that you favor Alternative 4, which does not allow leasing or surface occupancy of the Finger Lakes National Forest but does allow the BLM to make royalty agreements with the gas companies conducting directional drilling from nearby private land. Individuals and groups can also write to Representative Amory Houghton, Jr. (R-NY), Representative Sherwood Boehlert (R-NY), and Governor George Pataki (R-NY) and ask them to express support for no leasing or surface occupancy of the Forest. ■

For More Information

- Mary Krueger
Northeast Regional Associate
The Wilderness Society:
617-350-8866
- Jesse Strock
Finger Lakes Forest Watch Congress
607-220-4222
www.flfwc.org

Little Missouri Grasslands, North Dakota



Wilderness Values

These wondrous grasslands contain more than a million acres of prairie, rolling hills, rugged buttes, colorful canyons, and 200-year-old Rocky Mountain juniper in the famed North Dakota Badlands. Lying along the Montana border, surrounding the north and south units of Theodore Roosevelt National Park, this area also features 200 miles of the Little Missouri River. Wildlife includes antelope, elk, mule deer, coyotes, bighorn sheep, prairie dogs, mountain lions, and golden eagles.

The Little Missouri National Grasslands are popular among hunters, campers, canoeists, and horseback riders. Sightseers can also find long, beautiful vistas throughout the area. Every year, people visit the region to hike and bike the 120-mile-long Maah Daah Hey Trail that winds its way through the region. History buffs can also find a treasure trove of dinosaur, bison, and crocodile fossils. Native American archaeological sites are abundant throughout the area.

A number of great American leaders and conservationists, from President Theodore Roosevelt to Olaus Murie, one of the founders of The Wilderness Society, have been drawn to the spectacular landscapes of Little Missouri Grasslands. Murie on one visit to the region wrote:

"Will the people of today, the people of tomorrow, continue to feel the pull of land that beckons to a sample of our country as it was, a country of space and beauty and a sense of freedom?"

The sun went low and dusk was creeping over the valley below us. We watched that poetic quality of light envelop the cliffs and rims about us, and settle over the river bottom where we glimpsed the gleam of water in the bends.

Not a serrated mountain range here, not a mossy forest, nor a lake studded paradise. Rather an open country, its trees are twisted and storm worn, and grow sparingly along the riverbanks. A raw country, a country in the making perhaps. This very fact, this character, the attributes of chiseled buttes and domes, the clay and prairie grass, the eagle, the prairie dogs, deer, coyote; the flocks of grouse at heads of the wooded draws—all these spell one phase of our west—not to be compared with different ones—to be taken and enjoyed for its own singular beauty and character. Ordinary country, but with an aura of the west—something that drew Roosevelt, the adventurous ones." ■

Status

Of the 42 states where the U.S. Forest Service manages the public's lands, North Dakota is one of only two where not a single acre has been protected as part of the National Wilderness Preservation System.

The Forest Service addressed oil and gas issues along with the growing pressures of irresponsible off-road-vehicle use and over-grazing in a new proposed management plan for the area. The plan and the final Environmental Impact Statement (EIS) are scheduled for release with a six-month-long comment period starting in July. The final management

plan is expected to state that a handful of areas are suitable for wilderness designation. Despite this, preliminary information from the Forest Service suggests that their recommendations will fall far short of the wilderness proposal of local, state, and national conservation groups.

Conservationists have proposed more than 200,000 acres of wild roadless areas including Bullion Butte, Kinley Plateau, Long-X Divide, Lone Butte, Magpie, Bennett-Cottonwood, and Horse Creek to be given wilderness protection. ■

Why is Little Missouri Grasslands Threatened?

The Cheney/Bush Energy Plan and the potential rollback of the Forest Service's roadless policy will open key wild lands to oil and gas development and new road construction. Given the extensive development thus far in the region, any additional pressure from further drilling and road building will devastate one of our nation's last great grasslands. ■

Oil and Gas Development

Today we see a sea of oil and gas wells surrounding a few islands of potential wilderness. Since the 1970s, the acreage of roadless lands here has plummeted from 500,000 to 218,650 mainly as a result of oil and gas development and many associated roads. There are more than 1,500 well sites in the region. Seventy-three percent of the public's land here has been leased to oil companies, and another 25 percent is available for leasing. With a mere 2 percent of the region off-limits to oil and gas exploration and drilling, the Forest Service must do all it can to prohibit new leasing and drilling in the remaining pristine areas. ■

"As I pick this year's bountiful harvest of juneberries that the badlands offers up, I think of a lifetime of picking wild fruit, so much a part of growing up and living on a ranch in western North Dakota. Will these wild canyons and draws remain unspoiled, left as secret, tranquil places of discovery and of plenitude, I wonder? Surely the three-quarters of the badlands that has been sacrificed to provide the nation with oil and gas is sufficient toll. With my thanks, I offer up a silent wish that the ovenbird and the wren can be left to their peaceful lives as I walk away to my kitchen, to my pies and my pint jars."

Lillian Crook, lifelong resident of North Dakota and local champion of the Little Missouri Grasslands.

Take Action

Citizens can write North Dakota's three members of Congress to urge them to press the Forest Service to adopt a management plan that provides more wilderness protection for this area. ■

For More Information

- Bart Koehler
The Wilderness Support Center
970-247-8788
- Lillian Crook
Badlands Conservation Alliance
701-483-1297

Book Cliffs-Desolation Canyon, Utah



Wilderness Values

North of Green River, Utah, the 2,000-foot-high escarpment of the Book and Roan cliffs marks the southern perimeter of a million-acre wilderness of exceptional geographic and biological diversity. Bounded by a 250-mile-long thousand-foot-high band of cliffs, the longest continuous escarpment in the world, the Book Cliffs Region is one of the largest unprotected natural and predominantly roadless areas in the western United States. This region is rich in wildlife habitat, ancient cultural remains, and current recreational opportunities.

Because of its size, lack of human intrusions, and the diversity and abundance of its habitat, the Book Cliffs Region is an important sanctuary for wildlife. An estimated 375 vertebrate

species—half the number found in all of Utah—are found in this region. Its historical significance to humans is marked by numerous archeological sites, including rock art, rock shelters, campsites, and burial grounds. Today people float the region's White and Green Rivers, hunt its canyons and mesas, or simply enjoy observing wildlife bound over silver-green sage and early light burn on redrock cliffs. The Bureau of Land Management (BLM) recently called the Desolation Canyon area "a place where a visitor can experience true solitude—where the forces of nature continue to shape the colorful, rugged landscape." Unfortunately, much of these remaining wild lands are open for the development of coal, petroleum, and natural gas. ■

Status

The Utah Wilderness Coalition (UWC) is proposing wilderness designation for more than 1 million acres of wilderness quality lands within the Book Cliffs-Uinta Basin Region in pending legislation before Congress (America's Red Rock Wilderness Act, H.R. 1613 and S. 786). Through America's Red Rock Wilderness Act, units like White River and Lower Bitter Creek would forever be protected as areas in which animals can thrive and future generations can discover and enjoy. ■

"As a fifth-generation Utahn, born, raised and living in Roosevelt with a degree in biology, I can tell you first-hand that rampant oil and gas drilling and road construction has had devastating impacts to wildlife and wild places in the Book Cliffs region. Help me protect my heritage and my home."

— Chad Hamblin, Roosevelt, Utah

Why Is Book Cliffs Region at Risk?

One-hundred and forty years have passed since John Wesley Powell made his voyage discovery on the Green River through Desolation Canyon—a century of development. Yet the canyon and a very large surrounding region remain as wild as they were when Powell explored them. Bob Marshall once called this region the "Book Cliffs Roadless Area" and estimated its size at 2.4 million acres. In the 60-plus years since this survey, however, mineral development and road construction have reduced the size of this roadless area by more than 60 percent.

Much of the Book Cliffs Region has already been carved and drilled by development companies, narrowing the critical summer and winter range of the wildlife. The Utah Division of Wildlife Resources has identified a declining deer population due to factors such as drought, livestock grazing, increased human presence, and ongoing energy development projects. And both the Environmental Protection Agency and the Fish and Wildlife Service have expressed concern over the cumulative impacts of these projects in a letter to the BLM.

Why would the BLM refuse to protect the wilderness character of lands with such outstanding recreational, scenic, and wildlife resources? The BLM's fiscal year 2002 budget provides

continues on the back

Why Is Book Cliffs Region at Risk?

insight into what the future holds. It recognizes that the oil and gas industry has targeted most of eastern Utah as the next "gold rush" for oil and gas drilling. According to the BLM's April 25, 2001, testimony before the House Committee on Resources, the BLM's primary focus now is inventorying oil and gas reserves and accelerating the approval process for drilling.

Some specific projects paint the picture. The BLM has already approved various well drilling, road construction, and pipeline installation proposals within the White River unit (ironically in an area the agency itself recently found to have wilderness character) and Lower Bitter Creek. Currently, the BLM is reviewing a proposal to drill more than 400 gas wells and to construct hundreds of miles of roads throughout an 80,000-acre project area that includes both of these units proposed for wilderness designation. If this development is approved, these wild lands will be trampled by hundreds of

miles of roads, pipelines, drilling pads, production wells, and pumping stations. Visually, the project would be devastating. Well-access routes would be bulldozed over ridgetops, mesas, and through wash bottoms, and the landscape would be littered with noisy production equipment. Any opportunities for primitive recreation would be lost and wildlife habitat would be further compromised.

And development is neither limited to oil and gas nor confined to the White River and Lower Bitter Creek wilderness units. The BLM recently approved rights-of-way for a coal mining operation within the Desolation Canyon proposed wilderness—the largest block of unprotected roadless land in the lower 48 states. The proposed Lila Canyon Mine of nearly 2,000 acres would overlap both an existing Wilderness Study Area (WSA) and newly inventoried BLM wilderness units, displacing bighorn sheep and de-watering crucial seeps and springs—unique water sources in an otherwise dry area. ■

Oil and Gas Development

The oil and gas industry already has access to a vast expanse of Utah public lands for energy exploration and development. Drilling in Utah wilderness lands makes no sense when vast resources exist outside wilderness:

- The Uinta Basin covers about 6,900,000 acres in north-eastern Utah. The Utah Wilderness Coalition's (UWC) wilderness proposal in the basin covers 1,132,915 acres, or just 16 percent of the Basin.
- More than one-half of the total wells related to oil and gas production drilled in Utah from 1911 through November of 2000 (15,315) were drilled within the Uinta Basin (8,737), and the most productive part of the basin is north of the UWC proposal, closer to Vernal and Roosevelt. The fields in this area (Altamont, Bluebell, and Cedar Rim) have produced about 31 percent of Utah's oil.

- Oil and gas development is at an all-time high in the Uinta Basin, with more rigs operating and more Applications for Permit to Drill (APD) being processed than ever.
- From October 2000 through April 2001, the BLM's Vernal Field Office alone had received 337 APDs and had approved 306, at an average of 44 approved each month. The projected number of APDs submitted by industry at the end of the year is 578, and the BLM anticipates being able to approve 525. That is more than three times the average number of wells approved per year since 1990.

With all of this area already open to drilling, it is not necessary to permanently destroy the few remaining Utah lands that are still worthy of wilderness designation. ■

Take Action

The solution to preserving the precious wildlands in Utah is passage of America's Red Rock Wilderness Act. This legislation would preserve more than 9 million acres of Utah wilderness.

In the meantime, citizens should support a "look before you lease" policy for the BLM to ensure that citizen-proposed wilderness lands, many of them overlooked by the BLM in its original inventories, are reviewed for their wilderness values before irreversible development is allowed. ■

For More Information

- Pam Eaton
The Wilderness Society
303-650-5818, ext. 103
- Herb McHarg
Southern Utah Wilderness Alliance
435-587-3636
- Sabrina Williams
The Wilderness Society
202-429-8441

Grand Staircase-Escalante National Monument, Utah



Wilderness Values

Between the floor of the Grand Canyon and the rim of Bryce Canyon, the land rises 7,000 feet in a series of great cliffs and plateaus. This is the Grand Staircase-Escalante National Monument, a masterpiece of geologic and biological innovation, a world where time itself lies suspended in horizontal and vertical planes. Its huge stairway spans six major life zones, from Lower Sonoran desert to Arctic-Alpine forest. Its colorful rock formations contain some four billion years of geologic history, and its fossils are a biography of life on Earth. The Kaiparowits Plateau, within the monument, surrounded by the canyons of the Paria, Escalante, and Colorado rivers, is one of the most remote and least visited wild areas in the southwestern United States. Its rugged landscape, isolation, and sheer size have made the Kaiparowits a refuge for a remarkable variety of plants and animals.

In May, the Bureau of Land Management (BLM) announced that the Monument's paleontologist, Dr. Alan Titus, had made a surprising discovery of fossil skin impressions on a dinosaur skeleton under excavation in the Kaiparowits Plateau area of the monument. According to the BLM, this discovery ranks as one of the most important dinosaur finds made in the state and will provide important data on how these creatures appeared in life. ■

Status

The Grand Staircase-Escalante was established as a National Monument to "protect" the spectacular treasures and natural resources that are found within its boundaries. Eighty-five percent of the Monument's nearly 1.9 million acres has been proposed for wilderness and is included in pending congressional legislation—America's Red Rock Wilderness Act (H.R.1613 and S. 786). There are 16 Wilderness Study Areas (880,000 acres) in the Monument, plus 457,000 acres of lands the BLM recently inventoried and found to have wilderness character; thus, 1.2 million acres are recognized by the BLM itself as having wilderness character.

The federal government has spent nearly \$20 million to buy back coal leases within the monument to further protect it from development. In 1999, after several years of negotiation, the federal government paid Seattle-based Pacificorp \$5.5 million for 18,287 acres of coal leases and Andalex \$14 million for coal leases covering 34,499 acres within the Grand Staircase-Escalante National Monument. ■

Why Is the Grand Staircase-Escalante at Risk?

Soon after her appointment as Interior Secretary, Gale Norton proposed shrinking the boundaries of the new National Monuments to accommodate the energy industry; since then members of Congress have followed suit.

Representative Chris Cannon (R-UT) stated in recent public forums in southern Utah that he would favor re-leasing the Kaiparowits for coal development. Representative Jim Hansen (R-UT) has often remarked that the coal on the Kaiparowits

should be mined. In addition, he has repeatedly stated that the Grand Staircase encompasses much too much land and that the boundaries should be redrawn.

Congress could undo the protections afforded the Grand Staircase-Escalante National Monument by enacting legislation to change the mineral withdrawal established by the monument proclamation so that Kaiparowits coal could be released. ■

Energy Development

Within the Monument, there is currently a total of:

- Eighty-eight oil and gas leases (113,000 acres);
- Thirteen mineral leases (5,800 acres) that include limestone, coal, and metalliferous leases and that were transferred to the BLM from the state of Utah as part of a land exchange; and
- Sixty-eight unpatented mining claims (2,700 acres).

In addition, 52,8000 acres of coal leases that existed in the Monument at the time it was created have been bought back by the federal government for nearly \$20 million.

There is one producing oil and gas field within the boundaries of the Monument. The Upper Valley field, located primarily in the adjacent Dixie National Forest, has been producing oil since 1964 and produces approximately 220,000 barrels/year. There has been one dry hole (oil) drilled in the Monument since it was established. Another dry hole was drilled near the eastern boundary. If there were oil to be found and profits to be made, the 88 leases in the Monument would likely have been developed before now.

The main coal resource in the region lies in the Kaiparowits Plateau in an 18-mile-wide belt in the Straight Cliffs Formation. The Kaiparowits Plateau has been estimated to harbor 11 billion tons of recoverable coal. However, the coal resource is low in heating value, high in sulfur, does not comply with air quality standards, and would require a substantial public subsidy to compete in the private marketplace with mines in central Utah, Australia, or South Africa. A public subsidy would be required to overcome the high start-up and transportation costs associated with developing a new mine in a remote location far from the closest railhead.

"The Kaiparowits is the best habitat in the Monument for large mammals, such as the bobcats, coyotes, deer, and elk that live there now and the mountain lions, bears, antelope, and desert big horn sheep that have nearly been extirpated," said Tori Woodard, of the Escalante Wilderness Project. "The most valuable resources of the plateau are the wind, space, distance, silence, solitude, and the sheer unknown aspects of this remote place. Removing the Kaiparowits Plateau from the Grand Staircase-Escalante National Monument to allow coal mining would remove the monument's wild heart." ■

How Much Oil and Gas Can Be Gained?

The Bush administration and its allies in Congress have created the myth that an oil and gas bonanza awaits us in our National Monuments if only we turn Big Oil loose there. It's a fairy tale. Based on The Wilderness Society's analysis of U.S. Geological Survey data, the Grand Staircase-Escalante National Monument holds enough oil to meet the nation's needs for 4 hours and enough gas to meet the needs for 1 hour. ■

Take Action

The Wilderness Society opposes President Bush's proposal for digging for coal or drilling for oil in pristine wilderness quality lands. This is an extreme approach and is the antithesis of the "balance" that the Bush administration claims to be seeking between energy needs and sound environmental management of our public lands. Concerned citizens should contact U.S. Interior Secretary Gale Norton at the U.S. Department of the Interior, 1849 C Street, N.W., Washington, DC 20240 and tell her that they support keeping the Grand Staircase-Escalante National Monument intact and protected from mining and drilling.

Additionally, citizens should support a "look before you lease" policy for the BLM to ensure that citizen-proposed wilderness lands, many of them overlooked by the BLM in its original inventories, are reviewed for their wilderness values before irreversible development is allowed. ■

For More Information

- Pam Eaton
The Wilderness Society
303-650-5818, ext. 103
- Liz Thomas
Southern Utah Wilderness Alliance
435-259-5440
- Sabrina Williams
The Wilderness Society
202-429-8441

Lockhart Basin, Utah



Wilderness Values

Lockhart Basin lies in the eastern part of Canyonlands Basin just outside Canyonlands National Park and immediately below the Bureau of Land Management's (BLM) Canyon Rims Recreation Area. Lockhart Basin forms the backdrop for some of Utah's most famous scenic vistas, including the Island in the Sky District of Canyonlands National Park. The White Rim of Canyonlands National Park, an increasingly popular vehicle and mountain bike tour area, also contains many scenic viewpoints that look directly into Lockhart Basin. Together with the mesa tops above the rim, including Hatch Point, Lockhart Basin forms critical yearlong habitat for desert bighorn sheep and is home to peregrine falcon and other raptors.

"If ever there was a place where scenic quality should be strongly protected, Lockhart Basin is it," said Kevin Walker, a Moab, Utah, resident. "I invite President Bush to come to the basin and take a long, hard look at the natural beauty of this area. I doubt that he would still be able to insist, in good conscience, that the government should proceed with the exploitation of this beautiful place." ■

Status

Lockhart Basin is part of a more than 50,000-acre roadless area managed by the BLM. Citizens have proposed it for protection as a wilderness area as part of America's Red Rock Wilderness Act, now pending in Congress as H.R. 1613 and S.786. Lockhart Basin is an integral part of the ecosystem of Canyonlands National Park and was originally proposed for inclusion within the Park's boundaries. Unfortunately, it was excluded from the final boundaries in 1964 for political reasons. In recent years, the National Park Service (NPS) has expressed renewed interest in expanding Canyonlands National Park from "rim to rim" to encompass all of Canyonlands Basin, which includes Lockhart Basin. ■

Why Is Lockhart Basin Threatened?

In 1998, the BLM proposed to amend its land-use management plan for Lockhart Basin because the existing plan was out-of-date and did not reflect the value of the area for recreation and wildlife. Among the issues to be addressed: "oil and gas categories to determine if changes are necessary to protect sensitive resources." Unfortunately, at the same time, the BLM began sanctioning oil and gas development directly within Lockhart Basin by approving permits to drill and by issuing new leases above the rim on Hatch Point. And even though the BLM has yet to amend its outdated plan, it con-

tinues to offer additional leases on Hatch Point. Under the Bush plan, such leasing and development could be accelerated, and what few environmental protections are in place for Lockhart Basin could be waived.

Although the BLM acknowledges that the general vicinity already has severe off-road-vehicle (ORV) problems, its plan to allow additional oil and gas exploration and development would lead to new road construction and could result in additional ORV abuse of Lockhart Basin. ■

Oil and Gas Development

Legacy Energy Corporation, a privately held oil and gas exploration company in Denver, Colorado, has two approved Applications for Permit to Drill (APD) in the Basin and has acquired new leases in the Canyon Rims Recreation Area on Hatch Point. In approving the wells and issuing these leases, local BLM officials appear to be ignoring the natural values that make this a special place.

The proposed well sites and newly leased parcels are in one of the most scenic areas in Utah. The only difference between these wells and one within a national park is an arbitrary line on a map. And according to the Utah Division of Wildlife Resources, the wells are located within critical yearlong habitat for desert bighorn sheep. ■

How Much Oil and Gas Can Be Gained?

It would be tragic to destroy the nationally significant visual, wildlife, and recreational resources of the area for such a small chance of striking oil. The estimated success rate for discovery of oil in Lockhart Basin is only 14 percent. ■

Take Action

The solution to preserving the precious wildlands in Utah is passage of America's Red Rock Wilderness Act (H.R. 1613 and S. 786). This legislation would preserve more than 9 million acres of Utah wilderness.

In the meantime, citizens should support a "look before you lease" policy for the BLM to ensure that citizen-proposed wilderness lands, many of them overlooked by the BLM in its original inventories, are reviewed for their wilderness values before irreversible development is allowed. ■

For More Information

- Pam Eaton
The Wilderness Society
303-650-5818, ext. 103
- Herb McHarg
Southern Utah Wilderness Alliance
435-587-3636
- Sabrina Williams
The Wilderness Society
202-429-8441

Bridger-Teton National Forest, Wyoming



Wilderness Values

With spectacular mountain meadows, blue-ribbon trout streams, and lush valleys containing vast herds of elk and some of the rarest and most vulnerable species in the lower 48 states, the Bridger-Teton National Forest (B-T) is a truly exceptional place. Located in northwestern Wyoming, the Bridger-Teton National Forest borders Yellowstone and Grand Teton national parks and is a key component of the Greater Yellowstone Ecosystem—considered one of the most intact temperate ecosystems in the world.

While several large wilderness areas have been designated within the 3.4-million-acre B-T, more than half of the forest has also been opened to oil and gas leasing. Yet the fate of one of the most critical parts of the B-T, four management units

squeezed among the Gros Ventre, Fitzpatrick, and Bridger Wilderness Areas, is about to be decided, as the Forest Service is poised to make a decision on whether or not to lease this important area. Encompassing 370,000 acres, this section of the B-T provides crucial habitat not only for threatened species like grizzly bears, wolves, and lynx but also for elk, deer, and pronghorn, wildlife species that have used this area for more than 6,000 years as part of their seasonal migration route to winter habitat. In addition, the spectacular mountain vistas, unparalleled recreational opportunities, and world-class hunting and fishing found on this section of the B-T are a linchpin for the tourism economies of nearby towns like Jackson, Dubois, and Pinedale. ■

Status

In its 1990 Forest Plan, the B-T decided that 94 percent of the forest's administratively available lands (i.e., lands not designated as Wilderness or wilderness Study Areas) were available for oil and gas leasing but also that area-specific analyses would need to be conducted before formal leasing occurred. Thus, the four management units described were managed in their current state until industry nominated the area for leasing in 1997. Since that time, the area has continued to be off-limits to oil and gas development pending completion of the leasing analysis for the region. In December 2000, after three years of study and public input, the B-T came out with its draft Environmental Impact Statement (EIS), which proposed "no leasing" as the agency's preferred alternative. ■

Why is the Bridger-Teton National Forest Threatened?

The fate of this 370,000-acre portion of the B-T hangs on whether the Forest Service stays true to its draft EIS and recommends no leasing in the final EIS, which is scheduled for release this summer. However, the Bush administration's energy plan, with its directive that all administrative withdrawals of public lands from oil and gas leasing be re-evaluated, has many worried. In addition, since the release of the draft EIS, the governor of Wyoming has weighed in, urging that the Forest Service re-evaluate its draft EIS and open the area to leasing. Finally, the "roadless rule" developed by the Clinton administration would protect around three-quarters of the area, but its effect may be weakened by amendments put forth by the current administration. ■

Oil and Gas Development

The industry acknowledges that exploring for oil and gas on this part of the B-T is a gamble—even if they are allowed to drill here, they may not find any economically recoverable deposits. At best, they estimate that four days' worth of fossil fuels at current consumption rates could be extracted from the area. The history of exploration on the rest of the B-T is illustrative: of the 160 wells that have been drilled on the Forest, only 11 are producing, and all are located in the extreme southern end of the B-T. On the Forest's northern half, where the four management units under consideration are located, at least 75 wells have been drilled. Of these, only 3 or 4 yielded anything remotely close to commercially viable amounts—and even these were not developed because the "find" was too costly to extract. ■

Take Action

The B-T needs to immediately release a final EIS that formalizes the no leasing position the agency proposed last December. Delay or some other recommendation would be a flagrant disregard of the public's will and would jeopardize irreplaceable wildlife and recreational values. As the state's largest newspaper, the *Casper Star Tribune* has editorialized: "It (putting this part of the B-T off-limits to oil and gas) is a move that will protect some of Wyoming's most wild and scenic places. These are open spaces that are national treasures to be carefully conserved, not subjected to the effects of full-fledged mineral development." ■

Public Support for Protection

The B-T's draft EIS garnered an unprecedented level of public support. The Forest Service received more than 13,000 comments, with 95 percent of them supporting the B-T's decision not to lease this critical part of the Forest. Furthermore, 80 percent of the citizens who attended hearings in local communities spoke in favor of protection. The Teton County Commission, the Jackson Chamber of Commerce, recreational clubs, and hunting organizations all endorsed the Forest Service's proposed no leasing decision. Wyoming Senator Craig Thomas, a conservative Republican, has also supported the agency's draft EIS. In a letter to constituents, he wrote, "I believe other areas in the state are more appropriate for oil and gas exploration. Clearly, some areas should and deserve to be protected—the Bridger-Teton Forest is one of those areas." ■

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Red Desert, Wyoming



Wilderness Values

Towering buttes, stunning rainbow-colored landscapes, the continent's largest active sand dune field, seasonal wetlands, the nation's greatest antelope herd and its only desert elk herd, rare plants, and prehistoric rock art - these are just some of the treasures that await the visitor to this truly unique part of North America. Comprising the largest unprotected and undeveloped high elevation desert left in the United States, the Red Desert encompasses 4.5 million acres, much of it within the Great Divide Basin of southwestern Wyoming. While oil and gas development has permanently changed the face of the state—including much of the Red Desert, the 600,000 acre heart of this special place remains remarkably intact. In fact, the Bureau of Land Management (BLM) has identified ten Wilderness Study Areas in this core area of the Red Desert. Wyoming conservation groups and the Wilderness Society have recommended that approximately 300,000 acres in eleven areas be designated as wilderness,

which represents the largest concentration of BLM wildlands in Wyoming.

Called the Jack Morrow Hills area by the BLM, today this "wild heart" of the Red Desert still offers an unparalleled wilderness experience with world-class wildlife viewing and hunting opportunities. More than 350 species make their home here, including cougar, wild horses, mule deer, bobcat, black bear, badgers, owls, falcons, sage grouse, and eagles. In addition, more than 45,000 antelope reside in this area, many of them migrating annually to and from the Greater Yellowstone Ecosystem.

Since the settlement of the West and even long before, this region has played a special role in the lives of Native Americans and early settlers. In the Red Desert one can find two-thousand-year-old rock art and Shoshone spiritual sites and view wagon ruts and important landmarks used by Mormon settlers and pioneers on the Oregon Trail. ■

Status

For more than 100 years there have been attempts to permanently protect the Red Desert—from an 1898 effort to designate the region a "winter game preserve" to a 1935 campaign by Wyoming Governor Leslie Miller to create the "Great Divide Basin National Park." Nonetheless, in 1998 the BLM offered oil and gas leases in the intact heart of the Red Desert and today approximately 60 percent of this area is leased. However, oil and gas activity was put on hold while the agency went through a multi-year process to develop a land use plan for the area.

In the summer of 2000 the BLM came out with its Jack Morrow Hills draft Environmental Impact Statement (EIS),

which recommended oil and gas development for much of this special place. The response was a tremendous public outpouring of opposition, as well as a grade of "unacceptable environmental impacts and insufficient information" from the Environmental Protection Agency. In December 2000, Interior Secretary Bruce Babbitt stepped in, ordering the BLM to develop a supplemental analysis that conserved the area. He wrote, "The presence of finite resources should not deprive future generations of the natural and aesthetic wonders of the Great Divide Basin....An appropriate decision will be made to protect this unique area and its outstanding values." ■

Why is the Red Desert Threatened?

With the Bush administration advocating increased energy development across our public lands, it is quite possible that the BLM will go forward with a final EIS that opens to oil and gas development this last intact portion of the Red Desert. Currently, the agency is still reviewing the tremendous number of comments it received on its draft EIS and has not indicated whether it will complete the new supplemental analysis requested by Babbitt before issuing the final EIS. Meanwhile, the Governor of Wyoming and the Wyoming Petroleum Association both recently petitioned the new administration asking that Babbitt's directive to the BLM be overturned. ■

Oil and Gas Development

According to the BLM, much of the Jack Morrow Hills area has a high likelihood of containing natural gas supplies. However, nearby areas are already being drilled and any benefits that might come from exploration are completely outweighed by the certain costs of forever devastating the habitat and aesthetic values of this last undiminished remnant of the Red Desert. In addition, one needs to consider that the vast majority of public lands in Wyoming are already open to oil and gas activity. For example, of the 18 million acres of BLM land in Wyoming, over 17 million acres (94 percent) are currently available for mineral leasing, drilling, and mining. ■

Public Support for Protection

As the special landscape, wildlife, and historical values of the heart of the Red Desert have become better known, a groundswell of public support for protecting the area has been building. The BLM received more than 12,000 public comments on its draft EIS—a record number for the agency for a single project. Even more impressive is the fact that more than 93 percent of these comments supported closing the area

to any oil and gas development. This included many long-time Wyoming citizens. As Craig Thompson, a college professor in nearby Rock Springs and a son of a petroleum worker, expressed it, "I've got a lot of hydrocarbon flowing through my veins, but in this case I just can't see the utility of sacrificing this scientific reserve so we can drive our SUVs down the highway and get 12 miles per gallon." ■

Take Action

The fate of the Red Desert will be decided in the challenging months ahead. Citizens of Wyoming and around the country are urged to contact U. S. Interior Secretary Gale Norton, the BLM, and their congressional delegation, demanding that the conservation alternative that former Secretary Babbitt laid out for the Jack Morrow Hills area be fully developed and implemented by the BLM. In addition, Wyoming conservation groups and The Wilderness Society are now calling on Congress to designate the 600,000 acre heart of the Red Desert as a National Conservation Area with a number of new wilderness areas to be designated within its boundaries. ■

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Upper Green River Basin, Wyoming



Wilderness Values

Located 100 miles southeast of Grand Teton National Park, the Upper Green River Basin consists of vast sagebrush mesas punctuated by meandering rivers and verdant ribbons of riparian forest and wetlands. A huge mountain-to-high-desert ecosystem, this part of northwest Wyoming is a land of vast open spaces and stunning vistas.

Seldom visited, the Upper Green River Basin provides critical habitat for migratory big game, songbirds, raptors, amphibians, and upland game birds within the southern Greater Yellowstone Ecosystem. This semi-arid basin is the primary winter range for one of the world's largest herds of antelope and mule deer—every winter an estimated 100,000 ungulates rely on the snow-free forage found here. In fact, the longest terrestrial mammal migration this side of Alaska occurs each spring and fall when pronghorn antelope move

between Grand Teton National Park and the Upper Green River Basin. The basin also harbors globally significant populations of sage grouse, a species being considered for listing under the Endangered Species Act.

The Upper Green River Basin encompasses more than 7 million acres of mostly public lands situated among the Wyoming, Gros Ventre, and Wind River mountain ranges. Most of this area is administered by the Pinedale office of the Bureau of Land Management (BLM), with the flanks of the basin located on the Bridger-Teton National Forest. Conservation groups have long proposed wilderness designation for areas within the basin, including along the east slope of the Wyoming Range, the eastern extension of the Gros Ventre Range, and the lower elevation west flank of the Wind River Range. ■

Status

Unfortunately, the vast majority of the public lands in the Upper Green River Basin have already been leased for oil and gas development, and the Forest Service and the BLM have temporarily withdrawn only a few critical areas from leasing. For most of the basin—especially the lower elevation BLM portion—a major natural gas boom is occurring today with new wells going in as fast as the agency can give approval and industry can secure the drill rigs. For example, Sublette County, located in the heart of the Upper Green River Basin, currently has almost half of all the drill rigs operating in Wyoming and close to double the number of rigs operating in all of Alaska. ■

Why is the Upper Green River Basin Threatened?

This headlong rush to explore the Upper Green River Basin is occurring without any careful, comprehensive analysis of the impacts of this oil and gas development. No one knows at what point the region's wildlife populations will be threatened or whether airborne pollution from the basin's booming oil and gas development will significantly degrade the air and water quality of nearby wilderness areas. With industry having secured permits to potentially drill thousands of new wells in the basin, the threat is that much of the basin will end up being reduced to a single, exclusive use. In essence, public lands would be converted to an industrial zone.

This is already the case in the heart of the basin in the Jonah II gas field, which began development just four years ago and now sprawls over almost 50,000 acres and includes several hundred wells. Here one finds a landscape that once served as ungulate winter range and is now pockmarked with drilling pads and compressor stations and crisscrossed by roads,

continues on the back

Why is the Upper Green River Basin Threatened?

pipelines, and power lines. The Jonah II field graphically illustrates the falsity of industry's claim that new technology allows them to develop with a much smaller "footprint."

Now development of the Upper Green River Basin would occur even faster under the Bush administration's proposed energy plan, which calls for a streamlining of the regulatory process governing oil and gas development. In addition, the administration recently released a seriously flawed Department

of Energy report on the greater Green River Basin that concluded that a significant portion of public land gas resources were off-limits. Among its many shortcomings, the report wrongly included in its access limitations such reasonable requirements as seasonal timing restrictions to protect wildlife winter range and calving areas (a Wilderness Society critique of this report can be found at: www.wilderness.org/newsroom/pdf/doc_greenriver_071001.pdf). ■

Oil and Gas Development

The Upper Green River Basin clearly contains significant oil and gas resources, though how much of it can be economically recovered is still uncertain. More than 3,000 wells have already been drilled in the Upper Green River Basin and current permits allow for up to 4,000 additional wells. Industry has stated that southwest Wyoming—including parts of the Upper Green River Basin—could become the major natural gas-producing region for the country by the year 2015. So the issue is not whether any development will occur, but where it will be allowed and whether it will be carefully controlled to ensure protection of the region's wildlife, air quality, and other cherished values. ■

Take Action

Concerned citizens should contact the BLM and their congressional representatives asking that there be a moratorium on any new leasing in the Upper Green River Basin until a Programmatic Environmental Impact Statement is conducted that examines the cumulative impacts of oil and gas development in the basin. Mitigation measures to protect wildlife, such as seasonal timing restrictions on oil and gas activity, must not be weakened and must be actively monitored and enforced. In addition, wildlife migration routes, critical winter range, and important river corridors need to be formally delineated and permanently closed to any oil and gas development, with valid existing leases traded out or purchased by the federal government. ■

Support for Protection

Whether it is viewing antelope in Grand Teton National Park, hunting for elk in the Wyoming Range, or experiencing wilderness in the Wind River Mountains, what happens with oil and gas development in the Upper Green River Basin will have a critical impact in north-west Wyoming. For this reason, conservationists are increasingly scrutinizing the BLM's oil and gas permitting and oversight in the basin. More local residents are also protesting the noise, air, and light pollution associated with all the new oil and gas activity. ■

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