



PO Box 1312
309 Main Street, Suite A
Lander, WY 82520
307-335-8633 • Fax: 307-335-8690
www.wyomingwildlife.org

May 23, 2016

Don Kranendonk, District Ranger
Big Piney Ranger District
Bridger-Teton National Forest
P.O. Box 218
Big Piney, WY 83113

RE: Wyoming Wildlife Federation comments on the draft supplemental EIS regarding oil and gas leasing in portions of the Wyoming Range in the Bridger-Teton National Forest

Dear Mr. Kramendonk,

The Wyoming Wildlife Federation would like to provide you with our comments addressing the 39,490 acres within the Wyoming Range, which you are considering for oil and gas leasing. Our organization has represented the core of Wyoming's hunters, anglers and outdoor enthusiasts since 1937. Furthermore, Wyoming Wildlife Federation was one of the lead sportsmen's groups spurring a unified grassroots campaign that culminated in the passage of the Wyoming Range Legacy Act in 2009—federal legislation that declared 1.2 million acres of national forest land off limits to future oil and gas leasing.

As you are aware, the entities within Wyoming that expressed support for the Legacy Act were expansive, including dozens of private businesses, nearly 30 sportsmen and conservation organizations, outdoor educational institutions, a majority of state legislators in the congressional districts surrounding the Wyoming Range, former Wyoming Governor Dave Freudenthal, Senator Barrasso, Senator Enzi and the late Senator Craig Thomas.

Today's support list, including Wyoming Wildlife Federation, for Alternative 1 (no leasing alternative), for the 39,490 acres within the boundary of the Wyoming Range Legacy Act is equally voluminous.

While the Wyoming Range Legacy Act intentionally did not decide the fate of the 39,490 acres, it did provide clarity on the Forest Service's discretion in considering them, indicating that the Secretary of the Interior had full authority to take "any action necessary to issue, deny, remove the suspension of, or cancel a lease or any sold lease parcel that has not been issued, pursuant to any lease sale conducted prior to the date of the enactment of this Act."

During the spring of 2013, Wyomingites again displayed their opposition to oil and gas development in the Wyoming Range: 58,000 acres of valid oil and gas leases were purchased for \$8.75M from Plains Energy and Exploration Company (PXP) through contributions from over

1,000 donors. These retired leases in the Upper Hoback Basin lie directly adjacent to the bulk of the 39,490 acres of still-contested leases.

Hunting, fishing and wildlife viewing address the core values of approximately 60% of Wyomingites that engage in outdoor activities, generating over \$1.1 billion in revenue annually to Wyoming. Furthermore, the Bridger-Teton National Forest receives approximately 2.1 million tourist visits/year, generating over \$195 million in state revenue (2008). Commercial recreation within the Bridger-Teton National Forest generated an additional \$83.3 million (2008).

To refine the economic analysis further we will refer to a recent recreational economic analysis the former 44.7K area which includes the 39,490 acre area in consideration today.

- Hunting within the 44k resulted in 36,624 hunter days and generated \$1,853,814 in economic return (2011).
- Fishing within the 44.7K area resulted in 7,500 angler days and generated \$3,328,125 in economic return (2011).
- The combined hunting and fishing revenue generated in the 44.7k was \$5.2M (2011).
- Each of the five counties surrounding the Wyoming Range, Lincoln, Sublette, Sweetwater, Teton, and Uinta, averaged 5% and 6.6% annual growth in travel spending since 1998.
- Travel spending in 2011 generated \$71 million in Lincoln County, \$44 million in Sublette County, \$179 million in Sweetwater County, \$694 million in Teton County, and \$95 million in Uinta County.
- Travel and tourism directly generated \$15 million in earnings for 710 jobs in Lincoln County in 2011. It generated \$14 million in earnings for 430 jobs in Sublette County. \$38 million in earnings was responsible for 1,770 jobs in Sweetwater County, \$221 million in earnings was responsible for 6,920 jobs in Teton County, and \$16 million in earnings was responsible for 730 jobs in Uinta County.
- At least \$530,388 was generated by commercial outfitters for activities in the Big Piney Ranger District (2011).

To this point we have addressed: 1) the people of Wyoming and this country place a high personal value on remote backcountry outdoor recreation, 2) users provide a reliable and stable source of revenue for Wyoming and the nation.

Thirdly, we would like to address the biological and ecological status of 39,490 acre area in review. The Bridger-Teton National Forest completed the following study; “Elk Habitat Effectiveness and Security Supplemental Analysis Report for Plains Exploration and Production Company, (PXP) Eagle Prospect and Noble Basin Oil and Gas Master Development Plan - Supplemental Analysis for Oil and Gas Leasing in the Wyoming Range (44-7). Terry Hershey, Wildlife Biologist, USFS TEAMS, Gary Hanvey, Forest Biologist, USFS Bridger-Teton NF. March 2012. This study summarized additional assessments of elk habitat effectiveness and security.

Habitat effectiveness (HE) and security (HS) are two primary considerations of elk habitat assessment and management. Elk are often used as a surrogate to represent a suite of wildlife species impacted by disturbance. Elk are used because of the abundance of data collected on

them and the fact that they are considered to represent a median of several species relative to disturbance avoidance. This study provided analysis results for Units 2, 3 and 4 which are within the 39,490 acres in review (Figure 1). The units were further divided into subunits (i.e. Subunit 2a-d.).

In summary, HE values in Units 2 and 3 came very near the 70% threshold identified by managers and researchers as necessary for sustained quality habitat for elk. However, some of the subunits for Units 2 and 3 did not reach the threshold. Unit 4 contains high open road densities which resulted in all subunit values lower than the 70% HE threshold.

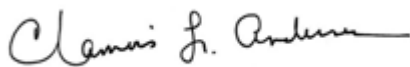
HS values for Units 2 and 3 generally met the 30% security threshold. Some Unit 2 and 3 subunits fell below the standard. Unit 4 and two of its sub-units (4-b and 4-c) fall below the recommended 30% threshold, which is largely due to high open road densities previously discussed above for Unit 4 in the HE section (Figure 2).

We recommend a full review of this study during your decision making process. Disturbance, primarily through open road densities, has already compromised HE and HS values to the point of exceeding Forest Plan Standards for Desired Future Condition 10 and 12 areas. Additional disturbance could become detrimental to wildlife use of the 39,490 acre area further compromise Forest Standards. Thus, Alternative 1 is also ecologically and biologically superior.

In addition to the study above, there is a plethora of moose, mule deer, and sage-grouse radio telemetry data which highlights this area as critically important to wildlife for breeding grounds, migration routes and stopover areas. We asked that serious consideration be given to these values as well.

Thank you for listening and we strongly encourage the selection of Alternative 1 as your final decision.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chamois J. Andersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chamois Andersen
Executive Director
Wyoming Wildlife Federation