



September 6, 2018

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

Dear Interior Secretary Zinke,

Proposed Bureau of Land Management oil and gas lease auctions pose significant risk to essential habitat and migratory corridors for mule deer and pronghorn. We respectfully request that you cease all new fluid mineral leasing in important winter range and migration corridors for mule deer and pronghorn in Wyoming, including deferring all third and fourth quarter lease sales in winter range and migration corridors. To conserve the habitats necessary to sustain these iconic western wildlife, as called for in your January [Secretarial Order 3362](#), we further request that you instruct the Bureau of Land Management to close Wyoming big game winter ranges and migration corridors to new oil and gas leasing and other major development.

While you recently deferred some parcels from Wyoming's third and fourth quarter lease sales including the Greater Little Mountain Area, the deferred parcels are dwarfed by the amount of remaining habitat that will be offered for sale in mule deer and pronghorn winter range and migration corridors. BLM's proposed third and fourth quarter lease sales include more than 1.2 million acres of mule deer and pronghorn winter range and Sublette herd migratory routes. Southern portions of the Grand Teton to Red Desert pronghorn migration corridor are also likely to be auctioned for oil and gas leases without adequate protection for these animals' migratory needs.

This is an alarming action that runs counter to your stated goals to "enhance and improve the quality of big-game winter range and migration corridor habitat on Federal lands" in western states.

Secretary Zinke, your January secretarial order states that the "best available science" will be used to inform "planning and developing energy" and "other relevant projects to avoid or minimize potential negative impacts on wildlife."

The science is clear.

A landmark study released in April 2017, *Mule deer and energy development—Long-term trends of habituation and abundance*¹ demonstrates that, even with timing stipulations and “extensive” mitigation measures, oil and gas exploration, development, and associated infrastructure can lead to long term declines in big game populations by reducing the size of winter range, which limits the number of animals that can be supported. Mule deer and pronghorn are known to avoid infrastructure associated with oil and gas development, but the Bureau of Land Management and energy companies have long claimed that oil and gas development only causes short-term harm. This new science demonstrates that is not the case.

This 17-year study of habitat in the Pinedale Anticline gas field in Wyoming’s Upper Green River Basin found that deer moved further away from the well pads even when drilling was winding down and remediation was in progress. The study concludes: “*Despite mild winters, fewer hunting licenses and extensive on-site mitigation, mule deer numbers on the Pinedale Anticline declined by 36-42 percent over the 15-year development period.*” This steep decline is more than double the overall 16 percent decline in the region. Similar findings hold for migrating pronghorn² that also avoid dense developments of gas fields.

Importantly, the study also found that mitigation efforts such as directional drilling, pipelines to reduce truck traffic, multiple drilling sites on pads and off-site habitat protection do not work. “*The most assured mitigation strategy is to avoid drilling and infrastructure within mule deer crucial winter ranges,*” the report says. The Wyoming Game and Fish Department has incorporated this best science in its [Wyoming Mule Deer Initiative](#).

Selecting an arbitrary limit upon which to defer parcels as you did with the Sublette mule deer herd, is not an effective strategy to protect this vital migratory pathway. Likewise, timing stipulations may be beneficial in the first year of an oil and gas field construction, but the newly installed infrastructure will still harm migrating wildlife the following year.

Secretary Zinke, please adhere to your pledge to protect big game habitat with decisive action. Interior’s BLM should withdraw important mule deer and pronghorn winter range and migration corridors from consideration for oil/gas leasing and other industrial developments in Wyoming.

Thank you for consideration of this request. We look forward to hearing from you.

Best regards,



Randi Spivak
Public Lands Program Director

¹ Sawyer, Hall et al., Mule Deer and Energy Development—Long-term trends of habituation and abundance, *Global Change Biology* 2017:1-9, DOI: 10.1111/gcb.13711.

² Renee G. Seidler, Ryan A. Long, Joel Berger, Scott Bergen, Scott Bergen, Jon P. Beckmann, Identifying impediments to long-distance mammal migrations. *Conservation Biology*, Volume 29, Issue 1, (99-109), February 2015. Wiley Online Library