

# WYOMING GAME AND FISH DEPARTMENT



"Conserving Wildlife - Serving People"

August 2, 2002

DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

02 AUG -2 AM 9:00

RECEIVED  
CHEYENNE, WYOMING

Alan Kesterke  
Acting State Director  
Wyoming State Office  
Bureau of Land Management  
5353 Yellowstone Road  
Cheyenne, Wyoming 82003

Dear Mr. Kesterke:

As we indicated to you in our telephone conversation yesterday, the Department is gravely concerned with the proposed leasing and potential development of BLM lands in the Trapper's Point area west of Pinedale. Unfortunately, Cheyenne Headquarters was not made aware of the proposed leasing until just yesterday, but already we have learned that this issue is taking on National attention. It is, of course, to our mutual advantage to avert a potential crisis of such magnitude.

The lands in question are identified in lease number WY-0208-086, a total of approximately 2,344 acres in T34N, R110W, Sublette County. In particular, sections 28 and SE NW, NE SE of section 29 are of greatest concern (in the preliminary list, these are identified in lease number WY-0208-087). Our Jackson-Pinedale Regional Office did receive the preliminary lease list dated March 25, 2002 and the lease sale notice dated June 21, 2002, but for whatever reason, this particular lease was overlooked. Likewise, the Pinedale BLM wildlife biologist was apparently not aware of this proposed lease according to a recent discussion he had with our regional wildlife management coordinator. He certainly would have notified our local personnel given that he is also very much aware of the significance of this migration corridor.

The Trapper's Point Bottleneck is well documented. Twice each year, several thousand deer and antelope migrate through this small corridor of sagebrush between the riparian areas of the Green River and the New Fork River. Archaeological records suggest deer and antelope have been migrating through this particular bottleneck for thousands of years. A recent dig conducted by the Wyoming State Archaeologist documented a 6,000-year-old antelope kill site in the core of the bottleneck. Mule deer remains were found as well. The natural bottleneck is created by the two river drainages, but it has been further restricted by subdivision development. Highways, county roads, and fences also impinge upon this already restricted corridor. Deer that migrate through this bottleneck continue on to summer ranges in the Gros Ventre, Snake River, Salt, and Wyoming Mountain Ranges. All antelope that summer anywhere from Cora Butte to Grand Teton National Park must first pass through this bottleneck.

The lease notice acknowledges that this parcel contains a "crucial big game winter range migration corridor" and includes a seasonal restriction from November 15 to April 30 for the

Mr. Alan Kesterke

August 2, 2002

Page 2

entire lease. However, there are no assurances for protection of this corridor if the drilling results in full field production. Ancillary facilities associated with full production and the associated monitoring and maintenance of facilities would be a grave concern. Any activities or additional surface disturbance in this corridor could be detrimental.

We have attached several maps and an aerial photograph depicting this migration corridor in relation to the proposed lease sale. These are based on Department records as well as a research study conducted by Hall Sawyer with the Wyoming Cooperative Fish and Wildlife Research Unit. Also enclosed is a copy of the May, 2000, Wyoming Wildlife, which includes two articles concerning the Trapper's Point Bottleneck. In addition to the biological and cultural research that has been conducted in this area, the Wildlife Heritage Foundation of Wyoming has provided \$30,000 for fence modification in the Trapper's Point migration corridor. This is the Foundation's inaugural project since the Trapper's Point Bottleneck is ranked the highest conservation priority in Wyoming.

Based on the aforementioned justification, the Department requests that sections 28 and 29 of the proposed lease either be pulled entirely from that portion of lease number WY-0208-086 or that these sections be identified as No Surface Occupancy. We further request that leasing of these particular sections or any other sections in the Trapper's Point Bottleneck be deferred until completion of the Pinedale Resource Management Plan Revision and associated environmental documentation.

We would greatly appreciate your consideration of this request. We apologize for bringing this to your attention at such a late date, but as previously indicated, we only learned of this issue at Headquarters yesterday. Again, thank you for your assistance on this very grave issue.

Sincerely,



BILL WICHERS  
DEPUTY DIRECTOR

BW:TC:as  
Attachments

cc: without attachments  
Prill Mecham, Pinedale Field Office Manager  
Bernie Holz, WGFD Jackson-Pinedale Regional Wildlife Supervisor  
Doug McWhirter, WGFD Cody  
Jay Lawson, Wildlife Division Chief  
Scott Smith, Jackson-Pinedale Region Wildlife Management Coordinator