

PO Box 200701
Helena MT 59620-0701
(406) 444-3186
FAX:406-444-4952
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Mrs. Theresa Hanley
Deputy State Director
Division of Resources
Bureau of Land Management
Montana State Office
5001 Southgate Drive
Billings, MT 59101-4669

In Reply to BLM 3100

Dear Mrs. Hanley:

Montana Fish, Wildlife & Parks (FWP) received your letter of February 9, 2007 regarding past and future coordination for Federal oil and gas lease sales in Montana. FWP is pleased to learn that the fish and wildlife information that we provided resulted in specific additional stipulations to the affected parcels and are optimistic that we can build upon this success to better serve the public and the fish and wildlife resources of Montana.

Some of the obstacles that have been encountered during the commenting process for leases could be addressed to a limited degree by coordination through the exchange of information programmatically and locally. There are 3 opportunities for us coordinate information exchange that we would like to pursue. Programmatically, we intend to initiate a meeting between Gayle Sitter and our Information Management Bureau Chief Janet Hess-Herbert in order to ensure that statewide information is shared between our agencies timely and appropriately. We also would like to engage in the lease nomination process at the earliest point in time by being informed as soon as nominations have been requested by industry, and by having our Field Biologists work directly with yours as soon as they begin working on the document of NEPA adequacy (DNA). Finally we have notified our staff that working with you to develop Resources Management Plans (RMP's) is an agency priority and your staff should anticipate full participation by Fish, Wildlife and Parks in this process.

Montana Fish, Wildlife and Parks understands your concern with us providing comments immediately prior to a lease sale and hope that taking action on our suggested coordination could help alleviate some of this distress concerning the timing issue. However, we believe there are substantive procedural issues that need to be addressed. These include 1) the current pace and magnitude of leasing (every 2 months and 100,000's of acres), 2) the time it requires for our staff to convert your lease information into a digital format that you are not able to provide, 3) the

time it requires our staff to create map layers (Appendix 2) of your proposed leases that are not available from the Bureau of Land Management (BLM), and 4) the time it takes for our staff to conduct an in depth analysis of potential impacts to fish and wildlife. We are currently not provided any preliminary fish and wildlife analysis from the BLM. It also requires our staff time to interpret what stipulations are correctly or incorrectly assigned. These stipulations are not currently available from the BLM in digital format for all areas of Montana. Because of this, we are not able to respond to your request for comments on lease nominations any faster than we already are.

These mineral leases are being made for lands administered by the BLM and occur within the framework of the Federal Land Policy and Management Act of 1976 (FLPMA). The responsibility lies with BLM for slowing the rate of leasing so that a professional and well thought out review and analysis of potential impacts to fish and wildlife and their habitats can occur. The time available for FWP to prepare maps, determine what resources are affected, analyze the potential impacts, and prepare a response for the lease sales is simply too short. It would assist FWP in our analysis if BLM could provide map layers of the locations of nominated parcels, provide the lease location and stipulation information in digital format, and request our help at the earliest time such as when leases are first requested for nomination. Regardless, FWP will continue to analyze and comment on proposed mineral leases to the best of our ability. Hopefully the BLM can develop the capability to provide the information necessary to analyze potential impacts from energy development more efficiently so that the ecological habitat for fish and wildlife can be adequately protected.

FWP has begun to assess how Federal mineral leasing and development has occurred across the West. We are hopeful that, in Montana, the relationship that our agencies have built over the years will allow us to cooperatively work together to most effectively conserve the public's fish and wildlife resources. I look forward to our meeting in the near future to continue our discussions of concerns and procedural issues in person.

Sincerely,

Larry Peterman
Chief of Field Operations