



February 27, 2009

Gene Terland, State Director  
BLM Montana State Office  
5001 Southgate Drive  
Billings, MT 59101

Tim Bozorth, Field Manager  
BLM Dillon Field Office  
1005 Selway Drive  
Dillon, MT 59725-9431

Dear State Director Terland and Field Manager Bozorth:

It has come to our attention that the BLM is evaluating a number of oil and gas lease tracts in the Centennial Valley in southwestern Montana. Without question, the Centennial Valley is one of the most spectacular and pristine landscapes in the northern Rockies. Without question, the fish and wildlife resources of the Centennial are equally valuable and unique, and sustain some of the highest quality hunting and fishing opportunities found in Montana. Oil and gas development would be jarringly at odds with protecting and enhancing these truly unique values.

We know that the BLM completed the Dillon Resource Management Plan in 2006 and determined through this planning effort that minerals on BLM lands in the Centennial Valley should be open to leasing. Based on the information available to the BLM at the time, perhaps this decision was appropriate. But even as the plan was being written, many public and private initiatives were underway to protect the magnificent landscapes and enhance the wildlife resources of the Centennial. Through these initiatives, tens of thousands of acres of private land have been protected from development, even while fish and wildlife restoration goes forward on both public and privately owned lands.

This work has not been the result of a master plan or grand strategy. Instead, individuals, organizations, and agencies, acting separately, have all recognized the matchless importance of the Centennial as a landscape and as habitat. Cumulatively, this work has resulted in the creation of a conservation landscape that should be expanded, not corrupted.

Attached are two maps. The first map identifies conservation easements and acquisitions that have been obtained in the Centennial from willing landowners by the Nature

Conservancy, the US Fish and Wildlife Service, or other parties during the last decade. The second map shows fish and wildlife habitat projects undertaken by the US Fish and Wildlife Service during the same period. Other work is also being done. For example, the National Wildlife Federation has provided incentive payments to livestock grazers in the Centennial Mountains to waive their permits to the Targhee National Forest, resulting in allotments totaling more than 46,000 acres, which are being closed to eliminate conflicts between livestock and grizzly bears.

The sum of this work, from easement acquisition, to fee purchase, to habitat improvements, to allotment retirement, has been to transform the Centennial from a landscape principally dedicated to livestock grazing, to one where grazing occurs within a network of lands that have been permanently protected for open space and wildlife. Also as a result of these efforts, a significant percentage of the entire Centennial is now protected from many kinds of development, particularly rural subdivision. This protection means that wildlife can move freely across the landscape forever, and that habitat improvement will enhance fish and wildlife populations rather than mitigate damage being done to them.

It needs to be stressed that this work to protect and enhance the Centennial is ongoing. The National Wildlife Federation is continuing its work to mitigate conflicts between livestock and large predators. The US Fish and Wildlife Service will soon issue a new comprehensive conservation plan for Red Rock Lakes National Wildlife Refuge. The Nature Conservancy is actively monitoring invasive weeds, evaluating possible easement acquisitions, and doing outreach to landowners. The Beaverhead-Deerlodge Partnership has created a framework for designating the Centennial Mountains Wilderness Area on BLM lands. The USDA Sheep Experimental Research Station is considering phasing out grazing on its lands in the Centennial Mountains. The Centennial Valley Association has been created as a vehicle for landowner involvement in all of the processes.

Oil and gas development on BLM lands would completely undercut the great conservation work that has occurred, and is occurring, in the Centennial. Rather than evaluating potential lease sales, we believe that it is incumbent on the BLM to consider an amendment to the Dillon RMP that withdraws federal minerals in the Centennial from oil and gas leasing. Such a course would bring the BLM into alignment with both the actions and the vision of many other state, private, and federal entities.

Under the Federal Land Policy and Management Act (FLPMA), the BLM is required to continuously inventory all public lands for their resource and other values, including outdoor recreation and scenic values. 43 U.S.C. §1711. Under FLPMA, this inventory shall be kept current “so as to reflect changes in conditions and to identify new and emerging resource and other values.” *Id.* The vibrant conservation direction that has evolved in the Centennial Valley during the last decade is precisely the type of information that the BLM must take into account as it considers the option of leasing or withdrawing federal minerals in this area.

Gene Terland, State Director  
Tim Bozorth, Field Manager  
February 27, 2009  
Page 3

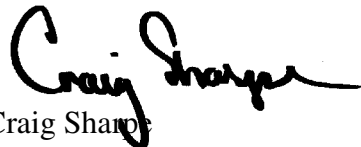
Based on these emerging values, the BLM, on its own motion, should publish a notice in the Federal Register that it is considering a withdrawal of lands in the Centennial and, by so doing, segregate the lands from operation of the Mineral Leasing Act while the withdrawal is being considered. Such action on the part of the BLM would suspend the evaluation of the lands presently nominated for leasing in Centennial and allow a thorough and public review of the appropriate land use direction in this irreplaceable landscape.

Thank you for your consideration of this request for a withdrawal.

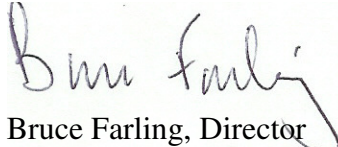
Very truly yours,



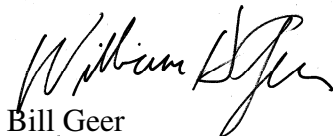
Thomas France, Regional Executive Director  
National Wildlife Federation



Craig Sharpe  
Montana Wildlife Federation



Bruce Farling, Director  
Montana Trout Unlimited



Bill Geer  
Theodore Roosevelt Conservation Partnership

c: Senator Jon Tester  
Senator Max Baucus  
Congressman Denny Rehberg  
Governor Brian Schweitzer  
FWP Director Joe Maurier