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**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
BOARD OF LAND APPEALS**

WESTERN WATERSHEDS PROJECT,
CENTER FOR BIOLOGICAL
DIVERSITY, and AMERICAN BIRD
CONSERVANCY,

Appellants,

v.

BUREAU OF LAND MANAGEMENT,

Respondent.

IBLA No. _____

Appeal of the Decision Record, Finding of
No Significant Impact, Environmental
Assessment DOI-BLM-UT-W020-2017-
0001-EA for the September 2017
Competitive Oil and Gas Lease Sale

DECLARATION OF COLYN KILMER

I, Colyn Kilmer, declare as follows:

1. My name is Colyn Kilmer. I currently reside in Oakland, CA. I moved to Sanpete County, Utah in 1991 and lived there during high school, and returned to live there in 1996 and again in 1999 – 2002. Sanpete County neighbors Juab County to the west, so there is a lot of connectivity between the two. My mother still lives in Sanpete County and I frequently visit her there. I lived in Salt Lake City, Utah from 2002 – 2016.

2. I hold a bachelor's degree in Communication from University of Utah, a master's of science degree in human dimensions of ecosystem science and management from Utah State University, and a paralegal certificate from Salt Lake Community College.

3. I am a member and supporter of the Center for Biological Diversity (the "Center"), where I am currently employed as a paralegal working primarily on California Environmental Quality Act (CEQA) issues in the context of development in the urban wildland interface. As a member and employee of the Center, I am very familiar with its work to protect native, imperiled, and sensitive species and their habitats.

4. The Center for Biological Diversity is a non-profit organization dedicated to the preservation, protection, and restoration of biodiversity, native species, and ecosystems. The Center works through science, law, and policy to secure a future for all species, great or small, hovering on the brink of extinction. We have more than 55,000 members, including many who reside in, explore, and enjoy the native species and ecosystems of the Interior Mountain West, where the greater sage-grouse is found. The Center has and continues to actively advocate for increased protections for species and habitats in the lands managed by the BLM.

5. The lands that will be affected by the challenged oil and gas lease sale include habitat for listed, rare, and imperiled species that the Center has worked to protect, including the greater sage grouse. The Center has been working to protect sage grouse and their habitat for over a decade. In 2005, the Center and a group of conservation partners filed a petition with the Fish and Wildlife Service to recognize the Mono Basin sage-grouse as a distinct population and grant it protected status under the Endangered Species Act. The Center and its allies later filed a federal lawsuit challenging the agency's "not warranted" finding. In 2011 the Center reached settlement agreement with the Fish and Wildlife Service compelling the agency to consider

listing the greater sage-grouse under the Endangered Species Act. The Center along with three other conservation organizations has also filed a lawsuit in federal court asking for more comprehensive plans to protect sage-grouse and its habitat across the West.

6. The decline of the greater sage-grouse, in Utah and other states, is of great concern to the Center, its staff, members, and supporters. Members, supporters, and staff of the Center enjoy viewing and photographing these birds and their spring mating rituals. They also recreate in, use, and enjoy sagebrush steppe ecosystem of Utah and surrounding states.

7. I personally share these interests. My mother raised me with a deep appreciation for nature and respect for the plants and animal and ecosystems of the earth. We spent a lot of time hiking in the woods and country back roads where we not only enjoyed the solitude and immersion in nature but we collected cans for money and picked up litter in order to leave the places we loved better than when we found them. It was a very simple thing but it made a big impression on me when I was young. Consequently I carried this ethic with me as I grew up, and later went on to pursue various activities and employment opportunities related to the protection of nature from carelessness and greed; those people and corporations that would put profit or self-interest over a shared responsibility to the earth.

8. Utah, particularly central and western Utah, is a very special place that I have tried in various ways to protect from the destruction of industry, greed and selfishness. In the early 2000s I worked for a summer conducting wilderness area surveys for a Utah environmental non-profit. While living in Sanpete County I personally advocated for off-road vehicle trail closures and limitations on snow mobile use.

9. My travels to and through the west desert began when I was in high school when we traveled to play away games at small towns in the west desert. The quickest route from

Sanpete County is through Nephi on Highway 132. I came to love the vast spaces empty of civilization. This is still the route I take to go out to Delta, Topaz Mountain, Gandy and other favorite spots in the west desert.

10. The west desert is easily my favorite part of Utah. I go there to feel small in the face of huge expanses of sky and sage. I love the harshness of the terrain, which can be both unforgiving and soothing. I like to check out old mines and look for interesting rocks and plants. My dogs also love it out there; a great environment for long distance running. Sometimes we just drive out for the day. Other times we camp and it's always so refreshing to be able to easily find a great spot and never see, hear or smell anyone else.

11. Although I have seen and heard sage grouse in other parts of Utah, I have not seen or heard them in this area of the west desert. I am always excited to see these birds and the more places that I can do so the better, both for the ecosystem and my own personal gratification.

12. I would be irrevocably harmed if oil and gas development in this area are allowed to proceed. My use and enjoyment of this area would be harmed by the loss of aesthetic qualities as well as impacts to sage grouse and other wildlife species. We already have one county in Utah that has been wholesale sacrificed to oil and gas development (Uintah). That place has been badly damaged by noise pollution, air pollution, crisscrossed with wide, oiled roads for company truck, leaving little room left for the animals that live there and the people who need these wild places. I don't want to see the west desert similarly destroyed, and it would be if the area were developed for oil and gas. The air would become polluted. Noise, roads and traffic would harm the resident wildlife and construct a landscape of industry rather than solitude, isolation and beauty. It would become an inhospitable place to visit or even travel through.

13. Leasing would also impair my future plans to visit the West Desert District area. I plan to return to the west desert in the reasonably near future. Having spent many of my formative years in this area, I have developed a bond that continues to draw me back. Not just as a place to visit and recreate in, but as an indelible part of my being. Construction of oil wells, roads, and other surface infrastructure would degrade the scenery, wildlife, and wilderness values in the region and deter me from visiting the region to recreate and find sanctuary.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of October, 2017 in Oracle, Arizona.

/s/ Colyn Kilmer

Colyn Kilmer