APPENDIX A—WRITTEN COMMENTS SUMMARY

INTRODUCTION

This appendix contains public comments received during the scoping period. This includes all written and oral comments received during the public scoping meetings as well as all hard copy letters and emails. Each comment letter was read and individual comments were identified and entered into an Access database. Each comment was categorized by the major resource/use raised in the comment. This appendix contains all the individual comments from that analysis process. As these comments are taken from public letters, they may contain inconsistencies in terminology, acronyms, references, or inconsistent or inaccurate policy statements. These were not corrected in this appendix. Terminology and acronyms were carried over from the original comments without an attempt to interpret or define them. In addition, comments that contained verbatim, duplicate comments were not duplicated in this appendix or in the comment or issue analysis, as the National Environmental Policy Act (NEPA) or the Federal Land Policy and Management Act (FLPMA) does not require or encourage accounting for the number of comments (e.g., votes), but addressing and identifying issues to consider in the environmental impact statement (EIS). Note: The comments submitted by Erik Molvar with the Biodiversity Conservation Alliance were submitted on the behalf of the Biodiversity Conservation Alliance, Western Watersheds Project, WildEarth Guardians, Defenders of Wildlife, and Center for Native Ecosystems.

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AIR QUALITY

Pete Arambel: Air quality issues need to broaden their view to take into account not only the oil and gas production, but industry as a whole in the area (trona, coal mines,) and the public factor (transportation, wood burning stoves, and recreational vehicles). Not to mention looking at global ecological activity.

Aaron Bannon—National Outdoor Leadership School: VI. Air Quality NOLS students and instructors are outdoors for two to three weeks straight, hiking and horse packing for miles a day, an activity accurately described as strenuous. These individuals and other visitors engaged in physical activity in the Red Desert could experience the ill health effects of excessive ozone, formaldehyde, nitrogen dioxide, and other noxious gasses that accompany oil and gas development. Providing a healthy environment to students is of paramount importance to the school, and we are closely monitoring air quality in NOLS classrooms near industrial zones. In recent years, winter ozone levels in the Upper Green River Basin have spiked to dangerously high levels, triggering Governor Freudenthal to recommend the Environmental Protection Agency designate the Basin as an ozone nonattainment area. The Wyoming Department of Environmental Quality (DEQ) has also instituted an interim policy with the intent to cap and reduce emissions in the basin. The monitor at South Pass has also been registering spikes in ozone levels, indicating that these events are widespread. The BLM should consider several steps that will help mitigate anticipated air quality violations should oil and gas development within the Red Desert expand. For example, it should consider additional monitors in popular recreation areas. It should require that best management practices be made mandatory (including the use of Tier-IV, or the equivalent emissions reductions, on drilling rigs). It should encourage directional drilling techniques be explored to reduce well and infrastructure density. It should have an action plan prepared to resolve excessive emissions issues when ozone and other noxious gases elevate. Finally, careful consideration should be given to impacts of development on other resources, including backcountry recreation.

Joy Bannon—Wyoming Wildlife Federation: BLM should adopt a proactive approach to air quality issues by using the land use planning process and the EIS to gather baseline air quality data and fully analyze the cumulative impact of any actions that may be authorized under the RMP, as well as past, present, and reasonably foreseeable future actions on all lands within the airshed. The RMP should establish an effective monitoring program and adopt measures adequate to curb the release of pollutants if monitoring reveals that standards have been exceeded. The RMP should set forth steps that will be taken to ensure that non-attainment areas are returned to compliance. This must include an analysis not only of air quality within the RSFO but a region-wide cumulative analysis. CAA requires the prevention of any significant deterioration of air quality in some areas, particularly in Class I airsheds applicable to National Parks and wilderness areas. The RMP should adopt measures to ensure the air quality of all proposed wilderness within the RSFO is preserved. WWF and NWF would also recommend that all lands within Class II airsheds be maintained or enhanced throughout the RSFO and for this goal to be represented in the revised RMP. The RMP should additionally address the issue of regional haze and the destruction of viewsheds caused by haze. BLM must acknowledge that oil, gas, and coal bed methane development on federal, state and private lands is a significant contributor to haze. Oil and gas development contributes to this and other forms of air pollution in several ways. Oil and gas activities produce large surface disturbances (pads and roads) and increase vehicle traffic, which contributes to particulate pollution. Oil and gas development also contributes to NOx0, SO2, and volatile organic compound (VOCs) pollution through activities like flaring, drilling, processing plants, wellhead compressors and compressor stations.

Randy Bolles—Devon Energy Production Company, L.P.: When revising the Rock Springs RMP, the BLM must be cognizant of its limited authority to regulate air quality. The BLM does not have direct authority over air quality or air emissions under the Clean Air Act ("CAA"). 42 U.S.C. §§ 7401 et seq. Under the express terms of the CAA, the Environmental Protection Agency (EPA) has the authority to

regulate air emissions. In Wyoming, the EPA has delegated its authority to the Wyoming Department of Environmental Quality.

Randy Bolles—Devon Energy Production Company, L.P.: With respect to potential visibility impacts, the BLM's authority is also limited by existing federal law. Under the CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 U.S.C. § 7475(d)(2)(B) (2010). Oil and gas operations do not meet the definition of a major emitting facility. (1.) Further, under the CAA, the regulation of potential impacts to visibility and authority over air quality, in general, rests with the Wyoming Department of Environmental Quality. 42 U.8.C. § 7407(a) (2010). The goal of preventing impairment of visibility in Class I areas will be achieved through the regional haze state implementation plans (SIP) that are being developed. 42 U.S.C. § 7410(a)(2)(1). Although federal land managers with jurisdiction over Class I areas may participate in the development of regional haze SIPs, the BLM has no such jurisdiction in Wyoming. Accordingly, the BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Wyoming, particularly if the overall goal is to reduce potential visibility impacts. Rather than attempting to regulate air quality in the Rock Springs RMP, Devon encourages the BLM to participate in and abide by the regulatory processes currently underway in Wyoming. Any attempt by the BLM to regulate air quality could lead to inconsistent, confusing, and possibly illegal standards if imposed by the BLM.

Kent Connelly—Coalition of Local Governments: Plan should provide for the establishment of a baseline for the resource area to be used to determine deviations. Baselines should be located to monitor air as it enters and leaves the area. Development projects that could be expected to have significant impacts would be required to provide monitoring to determine deviation from the baseline.

Nada Culver—The Wilderness Society: Recommendations: BLM should analyze impacts to air quality using the EPA's proposed NAAQS and include management actions and best management practices in the RMP that minimize and mitigate those impacts. BLM should consider economic and other benefits of protecting air quality.

Jason Fearneyhough—Wyoming Department of Agriculture: Air Emissions: At times, livestock grazing has been erroneously and unfairly characterized as a significant contributor to air emissions due to heavy construction activities and tailpipe emissions for transporting livestock. However, when estimates are computed correctly, the insignificance to air quality of these activities is minimal. We suggest this RMP omit this incorrect characterization as the Kemmerer RMP has done. In addition, methane gas from livestock has been characterized as a major contributor to greenhouse gases. However, the Intergovernmental Panel on Climate Change stresses these emissions vary based on the type of cattle, feed regime, productivity, and other factors. While consumption of beef increases in developing countries, the demand for beef rises. If livestock grazing were removed from public lands, cattle would likely be sent to feedlot operations sooner and more often. With this, comes more development of agricultural land and a shift to a more grain-based diet causing a rise in methane gas production. For these reasons, we suggest the RSFO RMP omit mischaracterizations such as these.

Brian L. Kelly: The air quality is deteriorating from increased development activity, the associated population increases, the coal burning facilities and the emissions from the oil and gas industries.

Erik Molvar—Biodiversity Conservation Alliance: Air Quality (1.) BLM must ensure that all activities on BLM lands are in compliance with federal and state air quality standards and take steps to improve air quality where such standards are not being met. (2.) Air quality impacts associated with oil and gas development should be strictly limited, which might degrade current Class I Areas (and on lands proposed for wilderness designation) and any areas of non-attainment of current air quality standards.

Brenda Schladweiler: I would recommend analyzing the CO2 sequestration capacity of the Sweetwater uplift, as well as other anticlines and geologic features, as part of the RMP.

Heather Smith—EOG Resources, Inc.: The BLM has no authority over air quality and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Wyoming, particularly if the overall goal is to reduce potential visibility impacts. Rather than attempting to regulate air quality in the Rock Springs RMP, EOG encourages the BLM to participate in and abide by the regulatory processes currently underway in Wyoming. Any attempt by the BLM to regulate air quality could lead to inconsistent, confusing, and possibly illegal standards if imposed by the BLM.

Russell A Spencer—Azalea Oil Company, LLC: The BLM does not have any direct authority over air quality or air emissions under the Clean Air Act. The EPA has the authority to regulate air emissions. In Wyoming, the EPA has delegated its authority to the State of Wyoming.

Larry Svoboda—EPA Region 8: At the resource management planning level, a quantitative approach, which includes air dispersion modeling, may be necessary to provide the decision-maker with the level of information necessary to support the decision-making process. The air quality analysis should provide the decision-maker with the information to guide planning decisions such as: the rate of oil and gas leasing or development; appropriate leasing stipulations; and/or necessary mitigation measures to include in drilling permits. The appropriate level of air quality analysis at the management planning stage will help to ensure that proper, proactive steps are taken to minimize adverse impacts to air quality. In RMPs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the cumulative impacts of projected oil and gas wells on air quality values within and outside of the planning area. The qualitative emission comparison approach, which is commonly used in Environmental Assessments and in some land use planning documents, is not specific enough to adequately address and predict air quality impacts from oil and gas development. While the qualitative emission comparison approach provides a means to compare the total predicted emissions of each alternative to a baseline year, it does not provide any indication of the potential for exceedances of ambient air quality standards or the potential for adverse impacts on air quality related values (e.g., visibility) in nearby Class I areas. In reviewing planning-level NEPA documents, EPA typically considers the following factors in determining the appropriate level of air quality analysis. These factors, while not exclusive, and which may vary from project to project, provide some indication of the potential for air quality impacts to occur from management plans that provide for oil and gas leasing and/or development. Number of projected oil and gas wells (i.e., reasonably foreseeable development). Distance of the planning area or projected well development areas from Class I airsheds and other sensitive receptors (i.e., National Parks, Class II areas and population centers). Distance from areas approaching a National Ambient Air Quality Standard (NAAQS). This is particularly important for ozone and fine particulate matter (PM2.5) in the West. EPA notes the Rock Springs planning area includes a portion of the area proposed for designation as non-attainment for ozone by the State of Wyoming. Availability of recent, relevant, and comprehensive air quality modeling data prior to management planning Draft EIS. Whether relevant, comprehensive, and cumulative air quality analysis is concurrently completed with a project-specific EIS in the management planning area, there is potential for cumulative adverse impacts to air quality from projects in adjacent planning areas. EPA would like to discuss with BLM the air quality impact analysis planned for this RMP/EIS. By proactively working together early in the RMP/EIS process, we hope to be able to assist BLM with the development of an air quality analysis, which will adequately address potential air quality impacts and identify appropriate mitigation measures. EPA notes there are several significant air quality modeling efforts currently underway for oil and gas projects in, and adjacent to, the Rock Springs planning area that may inform the analysis for the RMP.

Larry Svoboda—EPA Region 8: In RMPs/EISs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the impacts of projected oil

and gas wells on air quality values within and outside of the planning area. The analysis should disclose impacts to applicable National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments, as well as on air quality-related values in Class I areas. Specific pollutants of concern include nitrogen oxides (NOx), volatile organic compounds (VOCs), and fine particulate (PM2.5 and PM 10). The RMP/EIS should also identify all relevant, reasonable mitigation for air quality impacts, even if they are outside the jurisdiction of BLM. Recommendations for an Air Quality Workgroup and Air Quality Modeling Protocol: EPA would like to meet with BLM to discuss the air quality impact analysis planned for this IEIS. In addition, EPA recommends that BLM form an inter-agency air quality workgroup for this EIS to specifically discuss the planned approach to the air quality analysis, the results of the analysis, and appropriate mitigation measures. An air quality workgroup might include members from EPA, the State, and any other Federal agency with management responsibilities in the area. One of the primary purposes of an air quality workgroup would be to provide feedback to BLM at the earliest stages of EIS development. EPA believes stakeholder involvement is important at all stages of the air quality analysis including the emission inventory, the modeling protocol, analysis of results, and if necessary, identification of appropriate mitigation. Air Quality Mitigation: If the air quality analysis discloses significant, adverse impacts to air quality, then the E1S should include mitigation measures to address the impacts. EPA also recommends the EIS include modeled demonstrations that the mitigation measures will be effective. A significant, adverse impact to air quality may include contribution to predicted violations of an NAAQS and/or predicted adverse impacts on AQRVs. Air quality mitigation measures may include, but are not limited to: Tier II or better drilling rig engines (i.e., natural gas drilling rigs), Electric drilling rigs, Selective catalytic reduction or other secondary emission controls on drilling rig engines, Fuel additives, Electric or natural gas-fired compression, Condensate and water collection rather than tanks and trucks, Controls on start-up, Avoid natural gas driven pneumatic pumps, Use of low bleed or no bleed pneumatic devises or solar-electric pumps, Reduced pace of development, Phased development, Centralization of gathering facilities, Emission offsets, Green completions, and Additional EPA Gas Star program measures. Greenhouse Gas Emissions: EPA recommends the NEPA analysis include an analysis mad disclosure of greenhouse gas (GHG) emissions and climate change. While methane represents only 8 percent of the U.S. GHG emissions, it is 23 times more potent as a greenhouse gas than carbon dioxide. Oil and natural gas systems are the biggest contributor to methane emissions in the U.S., accounting for 26 percent of the total (EPA's Natural Gas Star Program and the U.S. Emissions Inventory 2007: Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2005). For the NEPA analysis, we suggest a four-step approach: (1.) Quantify and disclose projected annual and total project lifetime cumulative GHG emissions in CO2-equavalent terms and translate the emissions into equivalencies that are easily understood from the public standpoint (e.g., annual GHG emissions from x number of motor vehicles, see https://www.epa.goviRDEE/energy-resources/calculator.html). (2.) Qualitatively discuss the link between GHGs and climate change and the potential impacts of climate change. Include a summary discussion of ongoing and projected regional climate change impacts relevant to the action area based on U.S. Global Change Research. Program assessments. (3.) EPA also recommends that the EIS identify any potential need to adapt the proposed action to these effects as well as any potential impacts from the proposed action that may be exacerbated by climate change. (4.) Analyze reasonable alternatives and/or potential means to mitigate project-related GHG emissions. The Supplement to the Montana Statewide Oil and Gas EIS/RMP Amendment and the Lander Preliminary Draft RMPEIS both included excellent discussion, inventories and analysis of greenhouse gases and climate change. EPA recommends BLM incorporate a similar analysis in the Rock Springs RMP/EIS.

Brian Voigt—Crown Energy Partners, LLC: Regarding Air Quality, the BLM study should account for a steady decline in emissions on all existing wells as their production rates decline. The BLM analysis should also account for improved emissions control technologies that allow new wells to reduce any emissions associated with their production to less than 20% of what was historically emitted from a well prior to introduction of these technologies. Because of the steady decline in production of older wells and the emissions control technologies on new wells, some air quality studies in other management plan areas

have shown an overall decrease in emissions and an improvement in air quality despite on-going development and resulting increase in well count.

Shay Westbrook—Yates Petroleum Corporation: The authority to manage air quality rests with the Environmental Protection Agency (EPA), which has delegated its authority to the State of Wyoming through the Wyoming Department of Environmental Quality (WDEQ). Specifically, ensuring compliance with Federal and State air quality standards, setting maximum allowable limits (NAAQS and WAAQS) for six criteria pollutants: carbon monoxide, (sulfur dioxide), ozone and particulate matter and setting maximum allowable increases (PSD Increments) above legal baseline concentrations for three of these pollutants (SO2, NO2, and PM10) in Class I and Class II areas are all under the purview of WDEQ, subject to EPA oversight. We urge BLM to refrain from creating management conflicts by incorporating by reference the WDEQ requirements rather than preparing a new set of standards and guidelines. The recent implementation of restrictive regulations and standards pertaining to the emission of greenhouse gases (especially ozone) and other regulated air pollutants by EPA and WDEQ has created an increasingly challenging regulatory environment for conducting oil and gas operations in Wyoming. As such, we urge BLM to limit air quality regulations and air emission restrictions already required by law rather than preparing a new set of standards and guidelines. With respect to air quality analysis, BLM should place identified mitigation options and measures in proper perspective regarding possible implementation. It is important for BLM to stress that the need for such options will be based on demonstrated adverse air quality impacts rather than potential emission reductions. Demonstration of such impacts must be based on analysis of ambient monitoring data in conjunction with emission inventory data as well as appropriate air quality modeling. For modeling potential ozone concentrations, deposition and visibility photochemical grid models must be used. In this context, it is imperative that an evaluation of model accuracy be conducted. It is also important that adverse impacts be defined using appropriate definitions (e.g., NAAQS for ozone). Mitigation measures identified in the draft RMP must be accompanied by language clarifying that decisions on their application will be made based upon not only environmental factors but also economic and technical feasibility factors. It is important that industry has technical input into the determination of need for mitigation implementation, the data used to rank options and involvement in any ranking of options. Further, not all identified mitigation measures are appropriate for consideration, since some of the technologies are not feasible, are unproven or may result in unsafe operations.

CLIMATE CHANGE

Kent Connelly—Coalition of Local Governments: While agency policy calls for considering the effects of 'climate change' there is too little scientific data (if any) documenting actual impacts on Wyoming public lands. The doctrine remains largely unproven, especially if you exclude the IPCC data that have been lost and/or cannot be duplicated. The climate change issue is not supported by data that meets the Data Quality Act. For purposes of land use planning in Wyoming, there is no guidance about what effects may be seen or the causation. Any land management changes should be held in abeyance until there are solid data and evidence that climate change is adversely affecting public land resources in Wyoming.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP revision provides BLM with an excellent opportunity to analyze the impacts from climate change to the planning area over the next two decades as well as the contribution to climate change from management decisions made in the plan. This analysis should, in turn, lead to the development of thoughtful management prescriptions and alternatives in the land use plan that will address how BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change. Natural resource management must change from a paradigm of maximum sustained yield to a paradigm of risk management. In the attached recommended approach to addressing climate change in land use planning, we recommend an approach for assessing risk in the planning area as well as an approach for management of that risk for BLM to comply with its legal obligations under NEPA and FLPMA as set out above.

Nathon Maxon—Wyoming Outdoor Council: We are concerned about potential impacts from greenhouse gas (GHG) emissions, especially from methane and carbon dioxide, to the atmosphere, the ocean, and the ecological resources of the Rock Springs Field Office. In its report to Congress, the Governmental Accountability Accounting Office (GAO) said that "[t]o reduce lost gas, increase royalties, and reduce greenhouse gas emissions, GAO recommends that Interior improve its venting and flaring data and address limitations in its regulations and guidance.'' Quite simply, there are many fugitive releases of methane from BLM-permitted oil and gas operations yet cost-effective technology is available to capture those emissions, so this is a potential win-win opportunity. Consequently, we concur with the findings of the GAO and believe that BLM should adopt provisions in the forthcoming RMP that require all BLM oil and gas lease holders to minimize fugitive methane emissions during exploration, drilling, operation, maintenance, and processing operations. Toward this end, BLM should look to the Environmental Protection Agency's Natural Gas Star Program 33, which provides a number of recommended technologies and practices to reduce GHG emissions from compressors, dehydrators, controls, pipelines, tanks, valves, wells, and other infrastructure. In addition to taking this cost-effective step to reduce greenhouse gas emissions, the RMP should also consider the impacts of climate change on the natural environment in the RSFO. A warming climate might increase fire severity or frequency, cause increased pine beetle impacts to forests, and have other impacts. Thus, the RMP should put in place a monitoring program to determine if ecological conditions within the RSFO are changing, and if changes are occurring, provide for adaptive responses.

Neil and Jennifer Miller: Climate warming and its possible consequences must be a variable in the planning process.

Erik Molvar—Biodiversity Conservation Alliance: The cumulative effects of global warming are beginning to be felt in Wyoming. According to Naftz et al. (in press) average temperatures at the Upper Fremont Glacier in Wyoming's Wind River Range rose 5ºC between the mid-1800s and the early 1990s. The BLM must analyze the cumulative effects from emissions of greenhouse gases that result from permitted activities managed under the RMP.

Peter Nelson—Defenders of Wildlife: The effects of proposed management on special status species and wildlife resources in the context of climate change impacts must be part of this analysis. Note also that these principles guide BLM to do other cumulative effects analysis for wildlife resources, (e.g., the cumulative effects of existing and future energy development with the development levels allowed for in the plan). Defenders recommends that BLM fully consider the cumulative effects of the potential future impacts of climate change on wildlife in the planning area. In addition to analyzing and understanding the impacts of climate change, it is vitally important that the Rock Springs RMP incorporate management actions and other components for adapting to the effects of climate change in the planning area. The BLM is engaging in Rapid Ecoregional Assessments (KEAs), which are intended to "improve the understanding of existing landscapes, how they might be affected, and to inform future management actions" as part of a landscape level approach to climate change. Unfortunately, the Rock Springs planning area is not contained within the borders of any of the seven REAs currently being conducted by BLM. However, the BLM website indicates that the Wyoming Basin region was a pilot REA. No information appears to be publicly available from this pilot process, but BLM is required, under planning regulation and handbook guidance, to use this information in this planning process. Defenders recommends that information from the pilot process be used in this planning process and it be made available to the public with the draft EIS. Many groups have continued to demand that BLM create a comprehensive adaptation strategy. The Council on Environmental Quality called on federal land managers to develop such an action plan in its October 5, 2010, report. Unfortunately, BLM has not produced any guidance on climate change. The lack of a comprehensive strategy from BLM does not, however, excuse the Rock Springs Field Office from dealing with climate adaptation in its new RMP. Department of Interior Secretarial Order 3289 directs BLM to consider climate change in its planning and decision-making, stating that "the realities of climate change require changes in how the DOI manages land, water, and fish and wildlife resources." In addition, the Department of Interior's "America's Great Outdoors" (AGO) initiative also requires the consideration of climate, stating that agencies must "[b]uild climate change adaptation and mitigation into federal land management plans and practices." (AGO report, p.60). In order to comply with the secretarial order and the AGO initiative, the following must take place as part of this planning process: BLM must include climate change updated information in its data collection prior to developing the revised Rock Springs RMP. One key example is the accelerated soil survey currently under way with the Natural Resources Conservation Service and Utah State University (considered by BLM to be a climate-related project). Information from the pilot REA in the region as well as other REAs will also be useful. BLM must incorporate climate considerations into the decisions made by this plan, both in response to the Secretarial Order and to achieve the management goals laid out in the policy and handbook guidance discussed in this letter. As the order indicates, management cannot be successful without responding to the risks created by changing conditions. BLM must consider the unique threats of climate change in developing its monitoring and evaluation criteria in response to the Secretarial Order and to achieve the goals laid out in the policy and handbook guidance discussed in this letter. Defenders recommends that BLM use the Rock Springs RMP planning process to assess information on climate change, to provide wildlife management prescriptions for adapting to climate change in the RMP, and to lay out a process for monitoring the impacts of climate change and evaluating success in reaching adaptation-related goals.

Suzy Noecker—Wyoming Farm Bureau Federation: Also of concern to us is making management decisions based on 'global climate change.' We understand that you are bound to address the 'climate change' issue due to policy handed down to you by the Council on Environmental Policy. However, we feel the science surrounding this issue is questionable at best. It is certainly not settled and making management decisions based on flawed assumptions is not likely to lead to rangeland health, which is absolutely necessary in providing the resources needed for all the demands placed on lands managed by your agency.

CULTURAL RESOURCES

Pete Arambel: Historical trails should not be used to eliminate multiple use options.

Kent Connelly—Coalition of Local Governments: The RMP must provide for involvement and consultation with local governments in the management of cultural resources. DM-8130, .06.C, 8130, .15.B.2. BLM should review and evaluate previous historic trail inventories in accordance with the criteria required by the guidance in How to Apply the National Register Criteria for Evaluation, National Register Bulletin 51 (1995), (NRB #51). When trail segments are no longer visible or have been changed by continued use, they are no longer eligible and should not have been described as eligible. Id. at 44. Management of cultural resources as provided in the RMP should also be based on the following: (1) Estimated density, diversity and distribution of cultural properties in the plan area. The population of cultural properties in the plan area should be classified and described in quantitative and qualitative terms, preferably according to subunits of the plan area defined from the cultural resource data. (2) Present condition of the known cultural properties in the plan area. (3) Existing and potential uses of the cultural properties in the plan area. (4) Existing and reasonably foreseeable threats to the cultural properties in the plan area. (5) Traditional values ascribed to places and resources by Native Americans or other cultural groups. (6) The effectiveness of previous management actions to prevent the loss or destruction of cultural properties in the plan area. (7) Tribal, State, or local planning goals related to cultural resources in the planning area. (8) Existing cultural resource-related commitments and agreements, (e.g., Memoranda of Agreement, Programmatic Agreements, or Protocols with the State Historic Preservation Officer or Memoranda of Understanding with Indian tribes). Other restrictions should be limited to general statements, rather than attempting to anticipate possible restrictions based on hypothetical projects.

Nada Culver—The Wilderness Society: Recommendations: BLM's goal should be to protect, conserve, and, where appropriate, restore cultural and historical sites and landscapes. To that end, BLM should: Survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected. Determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources. Complete a Cultural Resource Management Plan that coordinates with the objectives of the RMP and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties to the National Register. The RMP should establish a timeline for completing the Cultural Resources Management Plan and prioritize areas to be inventoried for cultural resources. Outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and, where appropriate, restore cultural resources. Adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals. Consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.

Wyatt Hanks: The following list are my recommendations for the upcoming RMP and the future of the Red Desert based on my priorities and the things I care about: preservation of historical sites (mines, ghost towns, etc.) rather than reclamation or restoration.

John Hay, III—Rock Springs Grazing Association: In the checkerboard, the authority to use views of private land, from points on Public Land, to justify a historic setting is idealistic. More so if the historic feature is on private land. The emphasis on the setting, rather than the trace of historic trails is a new concept, and its significance must be well illustrated and understood to not include private land. There is opportunity to have a cooperative effort, with private land managers, to protect historic trails and other historic features. But, the hidden intent for the agency to dictate management on private land will aggravate the cooperative potential and adversely impact the historic trail trace. Fact is, the historic trail trace, and access to, are the property of the landowner, not the public—regardless of agency management

goals. Management prescriptions for historic trails and settings must disclose private property rights in relation to historic features.

Dick and Judy Inberg: Maintain protective corridors for our scenic and historical trails.

Fern Linton—Oregon California Trails Association: Discoveries of trail segments not identified previously need to be clearly marked, classified and protected along with the existing trail that is already identified and protected. The RMP should not only protect the existing sites but take into consideration new discoveries.

Fern Linton—Oregon California Trails Association: Preservation of Historic and Cultural Sites should be a #1 high priority. The current RMP has many provisions that help protect these sites. My particular interest is the many National and Historic Trails that cross through the Rock Springs BLM District.

Fred Lunton—Oregon California Trails Association: Keep the historical trails and Adobe Town from more intrusion. Keep the quarter mile viewshed on each side of the trails. If any development does go in beyond the protected area, you [should] try to blend it to the surrounding background. Adobe Town wants to see no development, to make it a permanent protected area.

Erik Molvar—Biodiversity Conservation Alliance: Historical and Cultural Resources: (1) Cultural and paleontological resources should be preserved in place so that their full scientific and cultural values can be evaluated and maintained. (2) BLM should inventory the Resource Area in order to identify sites of cultural and paleontological resources. (3) BLM should engage the Native American community in identifying sites that should be given special protections, including ACEC designation. (4) Sites of known cultural or paleontological resources, such as the Washakie and Bridger Formations, should be designated and protected as ACECs. (5) All permits, leases, contracts, rights-of-way or other agreements allowing private uses should require consultation and inventories prior to any surface disturbance to determine whether such resources are or may be present.

Erik Molvar—Biodiversity Conservation Alliance: Historical and cultural features should be thoroughly evaluated in accordance with BLM Information Bulletin 2002-101, with special attention given to historical and cultural sites that deserve long-term conservation (such as historic trails and ruins) or those features that may be important for traditional use, particularly by Native American groups (i.e., Traditional Cultural Properties). The settings for historic trails and sites must be diligently protected through 5-mile buffers in which oil and gas could be leased only under No Surface Occupancy stipulations. Waivers of this protective measure should be allowed only in cases where all impacts of oil and gas development (including wells and associated roads) are rendered completely invisible through intervening topographic features such as hills or draws. Native American trails, as well as important historic or cultural sites identified by the tribes, should be given similar protective measures.

Tom Rea—Alliance for Historic Wyoming: As you know, the parts of Wyoming administered by the Rock-Springs FO contain some of the best preserved and most pristine stretches of historic trail, in the nation, which have not yet been designated part of the network of National Historic Trails (NHT). As you write a new Resource Management Plan for the field office, please protect all these trails fully from any degradation of their historical qualities. We want you to keep industrial development of all kinds out of sight of the historic trails, all your historic trails. You call it managing visual resources. We call it maintaining cultural health. The Lander Field Office of the BLM shares with you the responsibility to protect the NHT-designated trails--the Oregon, California, Mormon Pioneer and Pony Express trails. As you know, the Lander office is about to recommend specific, new protections for those trails in the recommended alternative for its new RMP, due out soon. Please pay close attention to the Lander specifications. We hope they will offer a strong yet workable model for protection of all the historic trails

in the Rock Springs district and in Wyoming. At the same time, the National Park Service has begun studying the feasibility of adding more nationally significant trails to the NHT-designated network. The Cherokee and Overland trails will almost certainly be prime candidates. The Overland Trail enters the Rock Springs BLM district on the east at the Dugway Stage Station, continues past the LaClede Stage Station and on down Bitter Creek to Point of Rocks--as scenic and historic a stretch of trail as any in Wyoming. That stretch of trail also passes close by two different areas already under lease for further monitoring by wind-power developers. From there the Overland trail roughly parallels the 1-80-Union-Pacific corridor as it continues to the west boundary of your BLM district. The Cherokee Trail enters your district near its southeastern comer and angles northwest crossing the Green River (nowadays Flaming Gorge Reservoir), leaving your district about 20 miles north of the Utah line. All of the Overland Trail in your district and about a fourth of the Cherokee Trail are on the lands checkerboarded section by section into public and private ownership. That will make it especially challenging to manage visual resources along the trails. We fear developers will erect wind turbines and other permanent industrial facilities on private, checkerboard lands near the trails. Then they could, argue that since the nearby trails' viewshed has been degraded, they should be allowed to install industrial facilities on BLM land as well. This could put the BLM in a very difficult position. We hope that by anticipating this possibility, and working closely with the developers and with the Trails Office of the National Park Service, your office will be able to fully protect these national treasures, the Overland and Cherokee trails. NHT-designated trails already cross the northwest quarter of the Rock Springs BLM district: We hope that, along with the main parts of the trails, your office will also ensure NHT-level protections to their various branches, including the Lander Road and the many branches of the Sublette Cutoff approaching the Green River from the east. From Pacific Butte, it looks as if you're doing a good job so far. Office: Please evaluate all historical and cultural features, with special attention to historical and cultural sites deserving long-term conservation (such as historic trails and ruins) and those features that may be important for traditional use, particularly by American Indians. Prime examples include the LaClede Stage Station on the Overland Trail, the White Mountain Petroglyphs site, and many, many lithic scatters, tipi rings and vision-quest sites that are less well known.

Bill and Gail Robinson: We would like to know the status of the work that was done on the South Pass, Oregon and Lander Trails a few years ago (2006 or 2007). We would like to see the conclusion or report of that work that was done.

FISH AND WILDLIFE

Lorna Anderson: Please balance the use of BLM lands to conserve fisheries resources and habitat. Please identify and consider migration corridors for big game species. Please identify and consider fish barriers on BLM lands and remove them or avoid them. Consider spawning movements of fish species in management planning.

Joy Bannon—Wyoming Wildlife Federation: The following are terrestrial and aquatic management recommendations to include in the draft mad final RMP: Incorporate the most current and relevant scientific data that analyzes wildlife and fisheries impacts related to mineral extraction development and production. For instance, Hall Sawyer's mule deer studies within the Pinedale Anticline. Incorporate WGFD's Recommendations for Development of Oil and Gas Resources Within Important Wildlife Habitats, April 2010. Incorporate WGFD's Wildlife Protection Recommendations for Wind Energy Development in Wyoming, November 2010. Use Wyoming Executive Order 2010-4 Greater Sage Grouse Core Area Protection when developing management decisions Greater sage grouse, a SGCN and candidate species labeled by the United States Fish and Wildlife Service. Support responsible energy development through protections for fish, wildlife and their habitat. This includes maintaining contiguous tracts of land for multiple-use versus an industrial use. Migration corridors for big game species is important for the BLM to identify and consider when managing this area on a field office scale. The same can be said for important fish habitats as well. Also, provide an action plan for, if or when, migration corridors are fragmented or lost. Maintain or enhance critical winter range and seasonal habitats for big game. Avoid impacts to crucial winter habitat, migration corridors, and sensitive riparian habitat. All perennial streams shall have a ½ mile NSO buffer. Standard timing stipulations for all wildlife should be mandatory. Exceptions granted for wildlife stipulations should only be granted in extreme circumstances. Wyoming Wildlife Federation & National Wildlife Federation Rock Springs Resource Management Plan Revision Scoping Comments Page 9-The Best Management Practices as outlined in the BLMs' "Gold Book" should be mandatory requirements. Areas with critical big game habitat and Colorado River cutthroat trout should be considered for no leasing or NSO status. A review of cumulative impacts from wind development ROW, mineral leases, and pipeline proposals should take place before further leasing and permitting continues to best protect traditional land uses such as hunting and fishing along with wildlife. A review of all existing roads and well pads in the region should be completed to consider use of existing infrastructure when developing leases. Establish thresholds for wildlife and fisheries impacts that will include indicators, a policy to avoid, mitigate or curb development impacts and prevention methods to maintain wildlife and fish numbers. Annual maintenance and threshold mitigation data of the habitat condition must be applied. We suggest the development of a monitoring and mitigation matrix for wildlife, wildlife habitat, fisheries, aquatic habitat, and stream changes with thresholds and indicators. Further, we suggest the development of an action plan to guide efforts if, and when, thresholds are met. One example of such is found in the Record of Decision Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Appendix B. Provide current inventory studies and a full analysis (which should be conducted before any proposed project is approved) of wildlife habitat, wildlife species, cold water fish species, riparian and stream habitat conditions for fisheries that depend on the area. Provide an environmental compliance plan that describes how the BLM will enforce monitoring, environmental compliance and remediation on wildlife and fisheries affected by oil and gas development in the field office boundary. Supply a comprehensive analysis of seasonal timing restrictions. Develop a cumulative effects scenario that illustrates what may occur to sensitive, threatened or endangered species that are within the field office and could see habitat changes. The RS RMP should incorporate a WGFD report titled, "Using the Best Available Science to Coordinate Conservation Actions that Benefit Greater Sage Grouse Across States Affected by Oil & Gas Development in Management Zone I-II (Colorado, Montana, North Dakota, South Dakota, Utah & Wyoming)," to avoid a decline in Greater sage grouse populations. In addition, the RS RMP should refer

to other up-to-date research and analysis available to address cumulative effects, habitat fragmentation, disturbance, and scenarios for actions to mitigate if or when sensitive species decline. Adequate baseline data does not exist for many wildlife species. The BLM and the WGFD should cooperate to obtain baseline data on wildlife, particularly those species of greatest conservation need identified in the Wyoming Game and Fish Departments (WGFD) "Comprehensive Wildlife Conservation Strategy" (2005), and particularly in areas slated for development. Baseline data for terrestrial and aquatic species along with vegetation data needs to be collected prior to any development moving forward to negate the potential for any species being listed on the Endangered Species list. Avoid sage grouse habitat to minimize impacts on this sensitive species. All existing wilderness study areas and areas of critical environmental concern should be maintained or expanded upon. WWF and NWF would not like to see a reduction in these areas. Wyoming Wildlife Federation & National Wildlife Federation Rock Springs Resource Management Plan Revision Scoping Comments Page 10. If an energy development is to take place within the RSFO, the RS RMP should stipulate: Collection liquid pits be fenced and covered with a net to avoid wildlife mortality. Well pads, roads, and supporting facilities be sited outside critical wildlife habitats. An environmental compliance plan be established that clearly states how the BLM will enforce monitoring, environmental compliance and remediation on wildlife and fisheries affected by oil and gas development in the project area. The environmental compliance plan should be developed on a landscape scale to determine management options for wildlife and aquatic species. Human activity and truck traffic can be reduced by using central collection facilities for condensate and drilling fluids. A liquid gathering system (LGS) would limit truck trips needed along with remote monitoring systems to negate removal of crucial winter habitat. Evaluate the competition for habitat that will occur among wildlife species when forced onto small tracts of land with fragmentation.

Joy Bannon—Wyoming Wildlife Federation: The preferred alternative for the Rock Springs RMP, as identified in the EIS, should emphasize resource conservation in order to preserve future use and users. Sensitive species need to have protection measures incorporated in the RS RMP, but big game [should] also meet the level of importance worthy of strong management protection. We are particularly concerned about surface disturbance, habitat loss and fragmentation of quality wildlife habitat loss. The BLM should not focus solely on timing limitations in crucial winter ranges as the primary mitigation measure for big game. We recommend allowing timing limitation exceptions on very conservative ground.

Joy Bannon—Wyoming Wildlife Federation: WWF and NWF cannot emphasize enough how important it is to plan as much in advance as feasible and to clump development as much as possible along already existing surface disturbance activities while maintaining valuable, quality habitat and corridors for wildlife.

Joy Bannon—Wyoming Wildlife Federation: WWF and NWF request clear management protocols for maintaining fish populations and an action plan for mitigation if and when populations decline. In addition, [there should be] a buffer of at least 500 feet to protect habitat for cutthroat trout. A wider buffer would provide better protection for these subspecies. Other public land management plans have implemented a 500 foot buffer for cutthroat trout watersheds. For instance, the BLM offices in Butte and Dillon, Montana, have a ½ mile buffer for streams and rivers with cutthroat trout and the Beaverhead-Deerlodge National Forest in Montana has a Resource Management Plan with "no surface occupancy" provisions within ½ mile of entire cutthroat trout watersheds (2009). WGFD recommends a 500 foot buffer for cutthroat trout streams in their "Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats, April 20."

Martin A. Brockman: I would like to express my support to the WWF principles for public land management. I think energy development can occur in most areas as long as done with minimal impact to wildlife. I believe there may be areas where wildlife biologists determine areas should remain undisturbed, and we should follow these experts' advice. Improvements to one area for wildlife habitat in

return for use of another area is a very good conversation practice that many states and Canada use, and I think it creates a win-win situation for all.

Steven Brutger—Trout Unlimited: We seek the creation of alternatives that provide stronger protection measures for fish and wildlife and associated habitats. These alternatives should include goals to sustain and protect resources from a multiple use perspective. We also support collaborative efforts that engage multiple stakeholders, and we look forward to engaging with the BLM and others throughout the RMP revision process. Our principal area of focus regarding management of the Greater Little Mountain Area is energy development. Our scoping comments seek to raise issues and provide solutions for how responsible energy development can occur while maintaining fish and wildlife habitat. Additionally, TU seeks to protect traditional land uses, such as livestock grazing, hunting and fish. The GLMA has been identified for the implementation of a Master Leasing Plan (Oil and Gas Leasing Reform Master Leasing Plans, Statewide MLP Evaluation 11-20-2010). TU is supportive of this concept and feels an MLP should be completed for the GLMA as outlined in (IM) No. 2010-117, during the RMP revision process.

Kent Connelly—Coalition of Local Governments: Plan must determine if habitat can support population objectives established by the Wyoming Game and Fish (WGFD) without adversely affecting habitat, livestock grazing numbers and other multiple uses before adopting them in the RMP. Big game populations must also be viewed in light of current wild horse numbers and BLM's recently announced policy to reduce gathers, notwithstanding the lack of compliance with court decrees. RMP should include history of game populations, including the increases in game population objectives since the last RMP was written. Seasonal closures, avoidance areas and spatial buffers must provide for waivers, modifications and exception and by stipulation. The plan should clearly list the conditions under which they can be granted. These measures must also be supported by verifiable data that conform to the Data Quality Act. Section 515 directs the Office of Management and Budget to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." §515, Public Law 106-554. Plan must provide that wildlife habitat management conforms to Wyoming Standards for Healthy Rangelands. Proposals for fish and wildlife compatible structures such as culverts, bridges, fences and anti-perching devices may be applied to new range improvements but must not require retrofit of existing ones, unless it is with the support of the existing grazing permittee. Spatial buffers and seasonal closures should not be applied to potential habitats and only to occupied crucial or critical habitats when scientifically proven to be effective and after analysis of all socio-economic impacts. Restrictions on human activities must not be placed on any areas. No introductions or re-introduction should be made unless it has been demonstrated that viable habitats for the subject species exist in the area and that such actions are compatible with existing uses. Introduction and reintroduction must also occur with coordination with local governments. (Page 15 of 18 CLG Scoping Comments for Rock Springs RMP Revision) For example, efforts to reintroduce big horn sheep should be limited so as to not require the cancellation of sheep grazing permits. The Ashley National Forest is currently proposing reintroductions and seeking BLM cooperation. This should not happen where it will force ranch operators out of business. Management actions for wildlife must not be used to restrict the development of livestock improvements, change season of use, or restrict use or timing of use of water developments or conversions in type of livestock. The plan must provide for feasible access to all areas for predator control. Predator control must be coordinated with local boards. Habitat management guidelines must be based on data that conform to the Data Quality Act. The plan should disclose the empirical basis for such guidelines.

Joshua W.D. Coursey—Greater Little Mountain Coalition: Avoid impacts to crucial winter habitat, migration corridors, and sensitive riparian habitat. When avoidance isn't possible, mitigation thresholds should be decided upon upfront and solutions determined.

Joshua W.D. Coursey—Greater Little Mountain Coalition: All perennial streams containing CRCT or with the potential for CRCT introduction shall have a 1/2 mile NSO buffer.

Joshua W.D. Coursey—Greater Little Mountain Coalition: No new leasing of areas that have multiple species overlap of critical big game habitat.

Joshua W.D. Coursey—Greater Little Mountain Coalition: Standard timing stipulations for all wildlife should be mandatory for energy development. Exceptions granted for wildlife stipulations should only be granted in extreme circumstance. The Best Management Practices, as outlined in the BLMs "Gold Book," should be mandatory requirements for energy development.

Joshua W.D. Coursey—Greater Little Mountain Coalition: For anglers this is one of the only areas in the RSFO where it is possible to fish for native trout as the area holds excellent conservation populations of Colorado River Cutthroat Trout (CRCT). Currant Creek, Trout Creek, Upper Sage Creek, Gooseberry Creek, Red Creek and Little Red Creek all support CRCT in the Greater Little Mountain Area (GLMA). The CRCT is a sensitive species recognized by the Conservation Agreement for Colorado River Cutthroat as signed by the Wyoming BLM, Wyoming Game and Fish, US Fish and Wildlife Service, and the Bureau of Land Management, with a goal, "To assure the long-term viability of CRCT throughout their historic range." It is imperative that this conservation agreement be referenced and used when analyzing CRCT and making management decisions that impact them. The CRCT is also labeled as a Species of Greatest Conservation Need (SGCN) by the WGFD. (WGFD, 2005, A Comprehensive Wildlife Conservation Strategy for Wyoming, Cheyenne, WY. 125 pp.). In addition, the importance of this species, and its presence in the streams mentioned above, is recognized in the current RMP, and it should continue to be prioritized in the new RMP.

Joshua W.D. Coursey—Greater Little Mountain Coalition: For generations, the Greater Little Mountain Area (GLMA) has served as a hunting, fishing and recreational paradise for Wyoming sportsmen. For serious hunters drawing a deer or elk tag in the GLMA is a once-in-a-lifetime opportunity to hunt some of the best populations of trophy mule deer and elk in Wyoming. The GLMA contains antelope, mule deer and elk crucial range along with big game migration corridors for all of those species. "Crucial habitats have the highest biological values, which should be protected and managed to maintain healthy, viable populations of terrestrial and aquatic wildlife." (Wyoming Game and Fish Department [WGFD] Strategic Habitat Plan, 2009) Thus, these habitats and features are essential to big game population survival. The WGFD recommends no loss in habitat function to ensure these habitats retain their capability to sustain populations, species or diversity over time.

Joshua W.D. Coursey—Greater Little Mountain Coalition: The Greater Little Mountain Area (GLMA) is also home to 37 terrestrial species identified as SGCN by the WGFD. (WGFD, 2005, A Comprehensive Wildlife Conservation Strategy for Wyoming, Cheyenne, WY). Specifically, the area contains sensitive populations of Midget Faded rattlesnake, which is extremely rare and found only in the Flaming Gorge region, as wells the Pygmy rabbit, whose limited range includes the sagebrush habitat in the GLMA. Overall, the region possesses large, intact tracts of prime fish and wildlife habitat that is valuable in its own right and translates directly into opportunity for hunters and anglers. Recognizing the importance of this area, from 1990 about $3 million has been spent on habitat improvement. A majority of those funds came from the BLM, with the remainder coming from the WGFD, Grazing Board and Permittees, Bureau of Reclamation and Sportsmen's Groups. Over the last two decades, improvements such as watershed enhancements (particularly within the Currant Creek watershed), fencing, burns, tree planting, and wildlife habitat recovery have been conducted throughout this unique ecosystem. These efforts have led to significant improvements such as increasing wildlife productivity and landscape health. Given the significant investment in this area, it is important to make future management decisions that

further the good work that has been done and that we do not engage in actions that result in a backslide of current and past efforts.

Nada Culver—The Wilderness Society: Recommendations: To appropriately designate and protect wildlife corridors within the Rock Springs Field Office, BLM should: collaborate with other state and federal agencies and non-governmental groups to obtain current data regarding crucial wildlife habitat and corridors; connect already designated wilderness areas and other reserves to ensure that wildlife populations have the ability to easily move between large areas of protected crucial habitat; identify species that will act as focal species for identifying important wildlife corridors and will also act as indicators for how well the wildlife corridors are working; use the best available science to decide upon the exact areas to be designated and protected; ensure that all designations include specific provisions regarding management so that designated wildlife corridors are protected and can function as designed; and constantly monitor the effectiveness of designated wildlife corridors and implement adaptive ecosystem management strategies.

Rita Donham: The Killpecker Dune field is an exception, a geologically active and unique set of dunes. There are lots of water features within the dunes. Many of the wild herds of elk, mule deer, pronghorn and horses use these watering holes. The elk herd is apparently a special group, being smaller than the high mountain elk. These elk deserve an in-depth study, as they are rare. We've seen them numerous times in the Jack Morrow Hills and on the dunes.

John Emmerich—Wyoming Game and Fish: All or portions of Currant, Trout, Gooseberry, Sage, Red, and Little Red creeks support populations of sensitive native Colorado River cutthroat trout (CRC), and these watersheds afford appropriate habitat protection and enhancement under the new RMP to sustain habitat for healthy viable populations of CRC.

John Emmerich—Wyoming Game and Fish: Great Basin Spadefoot toads can be found throughout the Rock Springs BLM management area and are of concern to the state. The Great Basin Spadefoot is a xeric-adapted amphibian. It lives in sagebrush flats and shrublands. It requires loose, sandy soil for burrowing. Great Basin Spadefoots require permanent or temporary water sources for breeding. RMP planning should protect and enhance breeding habitats of the Great Basin Spadefoot. This would include playas, springs, seeps, ponds, reservoirs, and flooded riverine habitats.

John Emmerich—Wyoming Game and Fish: In addition to the Midget Faded Rattlesnake, many other species comprise the reptile assemblage surrounding Flaming Gorge. Most of this reptile assemblage is considered unique to Wyoming and is of concern to the state. Species include the Great Basin Gopher snake, Striped Whip snake, and Northern Tree Lizard. These species are also reliant on rocky outcrops and are primarily observed on southern exposures. RMP planning should protect rocky outcrops and adjacent habitat within the proposed Midget Faded Rattlesnake range. Efforts should be made to protect the Flaming Gorge reptile assemblage under the new RMP. It is suggested that planning takes into account habitat connectivity to ensure healthy reptile metapopulations.

John Emmerich—Wyoming Game and Fish: We recommend the BLM insert language into the RMP that permits the use of seasonal road closures throughout the resource area. Specifically, the Department and private landowners have used this method successfully in the Bear River Divide area to increase security habitats for big game without resorting to permanent road closures. Season closures are encouraged in portions of the RSFO, such as Cedar Mountain, and will improve both security habitats and wildlife related recreation.

Dean and Sherrie Frolic: Please protect the below-listed areas. We have been hunting in these areas for our entire lives. Why would you not protect the natural habitats in these areas? We support responsible

energy development, but we need to protect fish, wildlife and their habitat especially in these pristine areas. Please protect them from industrial use. Please sincerely consider our request for your help. Elk - 30, 31, 32, 98, 99, 100, 107, 124 Deer - 101, 102, 130, 131, 132, 138 Antelope - 58, 59, 90, 91, 92, 95, 96, 112.

Pete Gosar: I would ask that the waterways within your per view be scientifically base-lined and that the fisheries of the Little Sandy, Current Creek, Sage Creek and Red Creek be protected. All of these riparian areas are critical trout habitat, and I believe that Current, Sage and Red Creeks contain genetically pure cutthroat trout. As a fisherman, I am aware of the rarity and fragility of cutthroat trout, and I believe that these places should be passed from generation to generation as fully intact and functioning ecosystems.

John Hay, III—Rock Springs Grazing Association: The RMP must highlight that seasonal restrictions do not apply to activities on private land and may conflict with commitments and plans of the landowner. In the checkerboard, decisions to enforce seasonal restrictions must be a coordinated decision involving private land owners, especially during construction of large linear projects such as pipelines and power lines. Often new BLM specialist do not have the experience to judge if a winter shut down of a construction project is justified and to realize the impacts of such a decision for landowners. Decisions to shut down a project to protect wildlife may cause serious issues with accelerated erosion and weeds on disturbed soils exposed for months without rehabilitation.

Martha Hellyer: Maintaining an unfragmented wildlife habitat and land ownership is the most important thing to be the final outcome. This means having sustainable livestock grazing that is economically viable.

Jim Hissong—Upper Bear River Trout Unlimited: Please keep water usage from gas wells to a minimum. Encourage Deven Corporation to work with Trout Unlimited to remove culvert barriers at Trout Creek/Sage Creek Junction and replace it with a bridge so that the Cutthroat Trout are able to move up Trout Creek to spawn. Remove the barrier dams on Gooseberry Creek.

Dick and Judy Inberg: Designate and maintain protective areas for our wildlife.

Dennis Luszcz: Wildlife: The area mentioned above in sections 1 and 2 and those lands comprising elk unit 100 and pronghorn units 90-92 are among the most highly sought limited quota hunt by hunters in Wyoming. The area also contains a thriving sage grouse population. When coupled with the scenic values this area provides and relative low levels of development, it provides a truly world class quality hunting experience. I urge that planning take this into consideration and development be restricted or allowed with stipulations, which protect the unique value of the region. Elk unit 100, in particular, is one of the hardest permits to draw in Wyoming due to the high success rate for mature bulls. There are only a few such units in Wyoming that offer elk hunting in sage land ecosystems. In particular, care should be taken to keep the current level of road access and human disturbance as these activities have been shown to adversely impact elk populations.

Nathon Maxon—Wyoming Outdoor Council: As mentioned in the July 7, 2009, letter 15 from the U.S. Fish and Wildlife Service (FWS) to former Director Ferrell of the Wyoming Game and Fish Department, the placement of wind turbines in sage-grouse core habitat "negates the usefulness of the core area concept as a conservation strategy and brings into question whether adequate regulatory mechanisms are in place to protect the species." Industrial scale wind energy development has "the potential to reduce the size of sagebrush habitats directly, degrade habitats with invasive species, provide pathways for synanthropic predators (i.e., predators that live near and benefit from an association with humans, and cumulatively contribute to habitat fragmentation). (17.) Research on the impacts of oil and gas development on sage-grouse has shown such habitat fragmentation and anthropogenic disturbances may

lead to declines in sage-grouse populations. (18.) Because of these risks, we do not believe that wind turbines should be sited in greater sage-grouse core areas or in areas that provide connectivity between core areas. Scientific research has shown that oil and gas development negatively affects sage-grouse habitat and populations. We believe that core areas within the South Pass/Wind River Front area should be unavailable to future oil and gas leasing in the Rock Springs RMP, because this area forms part of the "lands within the Governor's Core Areas [that] are the very best of the best sage-grouse habitats in the very core of the species remaining distribution. Similarly, we believe that mining activities should not be allowed in this area because of the threats these activities pose to sage-grouse." In its letter to former Director Ferrell, the FWS mentioned, "ensuring the conservation of sage-grouse in the core areas is mitigation for the greater development flexibility outside core areas provided for the by the Strategy" and "allowing impacts within core areas, for research or other reasons, destroys the function and value of the strategy." Given the tenuous status of the sage-grouse and the likelihood that they will be listed under the ESA if their populations continue to decline, we believe that development is not appropriate in the world's best remaining sage-grouse habitat and BLM should ensure this area remains free of development to protect this iconic species.

Nathon Maxon—Wyoming Outdoor Council: The sagebrush ecosystem is considered to be the most threatened bird habitat in the continental United States (ABC 2007). Approximately 45 percent of the West's potential sagebrush habitat has been converted to other habitat types, including agriculture and urban areas (North American Bird Conservation Initiative 2009). The remaining portion is threatened by habitat destruction, fragmentation, invasive species, altered fire regimes, livestock grazing, energy development, and other stressors that may reduce its effectiveness for the more than 350 species of flora and fauna that depend on sagebrush habitats for all or part of their existence. Because BLM manages a significant proportion of the existing sagebrush habitat in Wyoming, the Rock Springs Field Office should ensure that it manages energy development and other anthropogenic pressures in sagebrush habitats with sufficient care to prevent the need to list sagebrush species under the Endangered Species Act. Although state and federal agencies have worked diligently to protect greater sage-grouse, other sagebrush obligates also merit particular attention. For example, while numbers of certain species are still fairly robust, populations of all sagebrush obligate songbirds are in decline and face an uncertain future (ABC 2007). Brewer's sparrow (*Spizella brewen*), sage sparrow (*Amphisp. Iza belh*), and sage thrasher (*Oreoscoptes montanus*) - all of which are considered sagebrush obligates during the breeding season - showed average annual population declines nationwide of 1.5 percent, 0.2 percent, and 1.1 percent respectively between 1980 and 2007 (Sauer et al. 2008). As a result, intact sagebrush habitats on BLM lands may provide critical refugia for sagebrush obligate songbirds. Energy development across the Intermountain West has occurred primarily within sagebrush-dominated landscapes (Knick et al. 2003). Research suggests that energy development may exacerbate regional declines of some sagebrush obligate passerines (Ingelfinger and Anderson 2004, Gilbert, 2011). For example, increased well density was associated with a decreased abundance of Brewer's sparrows and sage sparrows in three oil and gas fields in western Wyoming's Upper Green River Basin during 2008 and 2009 (Gilbert 2011). The probability of daily nest survival for Brewer's sparrow, sage sparrow, and sage thrasher decreased with greater well densities and increased proximity to well pads (Gilbert 2011). Both an increased susceptibility to nest predation and changes in the availability of food resources may have played a role in the adverse impacts of intensive energy development on sagebrush obligate passerines (Gilbert 2010, Gilbert 2011). Energy development in undeveloped sagebrush areas has been shown to facilitate increases in the abundance of breeding ravens (Bui et al. 2010), with concomitant negative effects on nest survival of species such as greater sage-grouse (Coates and Delehanty 2010). Sagebrush obligates may be particularly sensitive to the anthropogenic disturbances and habitat fragmentation that accompany energy development (Ingelfinger and Anderson 2004). For example, researchers examining the impact of roads associated with natural gas extraction on sagebrush obligate passerines found that the density of Brewer's sparrows and sage sparrows was reduced by 39 to 60 percent within a 100-m buffer around dirt roads with low traffic volumes (10-700 vehicles per day) (Ingelfinger and Anderson 2004). Given the high 22 density of roads

and the high traffic volumes that are typical of most energy development, reductions in species density and potential changes in species distribution following development could contribute to local and perhaps even regional population declines. Finally, anthropogenic noise also may reduce habitat effectiveness and contribute to population declines of sagebrush obligate passerines (Bayne et al. 2008, Francis et al. 2009). Research has shown that the elevated anthropogenic noise levels present at energy development facilities can lead to reductions in passerine densities and alter avian community composition (Bayne et al. 2008, Francis et al. 2009). Since Brewer's sparrows and other sagebrush obligate species are especially sensitive to the negative effects of habitat fragmentation (Knick and Rotenberry 1995, Rotenberry 1998), we recommend that the BLM seek to maintain large areas of contiguous sagebrush habitat, unfragmented by roads, development, invasive species, and other anthropogenic disturbances, to maintain viable populations of local sagebrush obligates. The BLM should consolidate energy development to the extent possible and minimize the breadth and extent of development by requiring directional drilling and other measures that reduce project area footprints. New road construction and road upgrades should be minimized. Noxious weed infestations should be rigorously monitored and aggressively managed. Range "improvement" projects that remove or reduce sagebrush by burning, herbicide applications, prescribed burns, or mechanical treatments should be carefully evaluated and generally avoided. Incorporating provisions to maintain the effectiveness of sagebrush habitats in the Rock Springs RMP will help to forestall the need to list currently declining special status and sensitive sagebrush species under the Endangered Species Act and secure essential habitat for the host of organisms that depend on Wyoming's sagebrush ecosystem. We have provided copies or website addresses where BLM may obtain copies for most of the sources referenced in this section as described in the accompanying "List of Exhibits and References."

Nathon Maxon—Wyoming Outdoor Council: We believe that wild ungulate herds have intrinsic value as well as being a source of significant and sustainable economic value for local communities and the State of Wyoming. We do not believe that seasonal restrictive stipulations from the 1997 Green River RMP adequately protect wintering ungulates. These stipulations apply only during the development phase and do not mitigate harm to wintering ungulates during operations. Once an area is developed, wintering ungulates may be adversely affected by increased surface disturbance and loss of forage plants, increased human activity, increased noise, increased air pollution, increased winter access for poachers, and increased risk of collisions with vehicles. To address these potential harms, we believe BLM should analyze options that better protect crucial winter range habitat for ungulates, including a withdrawal of winter ranges from development availability. We urge BLM to consult recent and ongoing research when developing this RMP to guard against mule deer, pronghorn, and elk population declines.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Maintain and improve quality habitat and healthy ecosystems - This area serves as seasonal and yearlong habitat for antelope, is crucial winter range for elk and mule deer, migration corridors for a variety of species, and most of the area is vital to Greater sage-grouse (within core population areas). Additionally, this area holds significant populations of Midget Faded Rattlesnakes, a species that while not threatened, is very rare. Colorado River cutthroat trout spawn in smaller tributaries of this region. Key habitat types of concern are sagebrush ecosystems, aspen, juniper woodlands, riparian communities, and grasslands. This area is a premier hunting and fishing destination and I urge careful management to allow it to stay this way for generations to come.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Baseline needs - As mentioned previously, the RMP must include an adequate baseline of where the most important habitats, grazing, mineral potential, and other resources exist. Supplemental to that is identification of those areas where the greatest potential exists for enhancement of species and their habitats. In particular, the RMP should address conflicts between elk and mule deer, habitat needs for Greater sage-grouse, Midget Faded

Rattlesnake, Colorado River cutthroat trout and other aquatic species, enhanced grazing opportunities, and aspen woodlands.

Carl Millegan—U.S. Fish and Wildlife Service: It has been shown through scientific studies across critical winter range in Wyoming that wildlife and habitat quality are declining significantly. Management actions within the RMP should give special consideration to, and provide special protections for, critical winter range within the district to reverse the declines in wildlife populations of all species that rely on these habitats.

Erik Molvar—Biodiversity Conservation Alliance: 2-mile buffers prohibiting surface disturbance should apply to ferruginous hawk nest sites with one-mile buffers for all other raptor nest sites.

Erik Molvar—Biodiversity Conservation Alliance: Although power lines can be designed to minimize impacts to raptors, these corridors should be sited more than 2 miles away from prairie dog colonies and sage grouse leks to prevent major impacts to these sensitive prey species.

Erik Molvar—Biodiversity Conservation Alliance: BLM needs to evaluate the presence of large complexes of prairie dogs for potential ferret reintroduction and should evaluate these complexes across Field Office and state lines as part of the NEPA process for the plan revision.

Erik Molvar—Biodiversity Conservation Alliance: BLM should restrict the logging or other reduction of wooded patches in the primarily open areas in the planning area that are elk habitat. The reduction of road densities on the winter ranges as a whole and the maintenance of low road densities in important habitat areas would aid in maintaining healthy elk populations. Both existing critical winter range and potential winter range should be managed to enhance its value to elk. BLM should incorporate this literature review into its Rock Springs RMP EIS analysis. All human activities should be prohibited on elk winter ranges between November 15 and April 30. Winter range areas should be withdrawn from the surface disturbances associated with oil and gas development and leased only under “No Surface Occupancy” stipulations.

Erik Molvar—Biodiversity Conservation Alliance: Burrowing Owl Nationwide, the burrowing owl is a species on the decline. Due to the importance of insects (particularly grasshoppers) in the diets of burrowing owls, the widespread use of pesticides would most likely result in impacts to burrowing owl viability. Effects of Livestock Grazing Bock et al. (1993b) reported that burrowing owls probably respond positively to grazing in grassland habitats but negatively in shrub-steppe habitats. The BLM should bear these trends in mind when drafting individual Allotment Management Plans. Monitoring: As a BLM Sensitive Species, annual monitoring efforts should be directed at burrowing owls to gain an index of population trend. Haug and Didiuk (1993) reported that 57% of burrowing owls responded to recorded calls in their study and that the “tall and white” stance adopted in response to calls made detection easier. These researchers recommended a series of three surveys at 5-7 day intervals during the nesting season to monitor population trends. These monitoring protocols should be established as requirements under the new RMP.

Erik Molvar—Biodiversity Conservation Alliance: Changes in Thermal Regime: The thermal regime of rivers and streams and its seasonal temperature fluctuations are very consistent and predictable from year to year (Vannote and Sweeney 1980). Conversion of warm water stream habitat to cold tail waters has been a major factor in the extirpation of native fishes in many parts of the Colorado River system and the proliferation of non-native competitor species (Tyus 1991). Water temperature has a controlling influence on the timing and development of aquatic insect life stages as well as determining the structure of aquatic insect communities (Vannote and Sweeney 1980). Flow regime is also a determining factor in

stream periphyton (i.e., plant life) dynamics, which form the base of the food chain in stream systems (Biggs and Close 1989). Thus, natural temperature regimes must be maintained at all costs.

Erik Molvar—Biodiversity Conservation Alliance: Changes in Water Flow Regimes: As discussed above, the maintenance of natural flow regimes is critical to the life history events of rare native fishes and discourages invasion of exotic species. According to Tyus (1991), "Viable populations of Colorado fishes must be maintained to allow testing of various management scenarios. This can only be accomplished by providing suitable habitat. Of first consideration is provision and maintenance of instream flows of the proper quality, timing, duration, and magnitude." (Ibid., p. 177) All activities that would alter natural flow regimes must be prohibited.

Erik Molvar—Biodiversity Conservation Alliance: Colorado River Cutthroat Trout Habitat damage resulting from road construction also has the indirect effect of granting competitive advantages to introduced species at the expense of native trout (Behnke 1992, Duff 1996). Road construction effects can also increase water temperatures (Meehan 1991), which can help brook trout to permanently displace native cutthroats (Behnke 1992). As a result of these factors, a number of scientists agree that reductions in the extent of road networks are essential to protecting and restoring trout habitats (Henjum et al. 1994, Rhodes et al. 1994, USFS and USBLM 1997a). This is a particularly important consideration when evaluating potential oil and gas projects in watersheds that contain populations of Colorado River cutthroat trout.

Erik Molvar—Biodiversity Conservation Alliance: Currently, the most recent comprehensive data on prairie dog distribution is from the 1980s; new colony surveys are needed to determine where conservation efforts should be focused and which colony sites require restoration efforts. The new RMP should require surveys to determine the spatial extent as well as periodic sampling protocols to index population trends within the major colonies.

Erik Molvar—Biodiversity Conservation Alliance: Deer and Elk: Mule deer and elk are important game species in the planning area. These game animals contribute importantly to the Wyoming economy, both from hunting and wildlife viewing visitors. Key elk habitats include most of the Jack Morrow Hills CAP area as well as Little Mountain. Thus, protections to maintain the viability of elk and mule deer are needed, and these protections should be focused on crucial winter ranges, crucial winter yearlong ranges, severe winter relief ranges, and calving areas identified by the Wyoming Game and Fish Department.

Erik Molvar—Biodiversity Conservation Alliance: Effects of Management Activities and Development on Raptors: The primary impact to raptor populations is direct disturbance of raptors on the nest, leading to reductions or loss of viability for eggs or nestlings. Disturbance of nesting raptors may cause nest abandonment, damage to the eggs, subject eggs or nestlings to cooling, overheating, or dehydration leading to mortality, prevent young nestlings from receiving sufficient feedings to remain viable, and cause premature fledging (Parrish et al. 1994). Thus, the BLM should establish adequate nest buffers (on the order of 2 miles in diameter for ferruginous hawks and one mile for other species) around nest sites, preventing all construction of developments (such as wells and roads) that would lead to future disturbance of nesting raptors through focusing human activities in these areas. Seasonal restrictions are insufficient; a well or road constructed outside the nesting season is still likely to lead to nest abandonment or reductions in recruitment due to disturbance from vehicle traffic that does occur during the nesting period.

Erik Molvar—Biodiversity Conservation Alliance: Elk: The BLM lands of the planning area contain significant amounts of elk summer and yearlong range, particularly in the Jack Morrow Hills planning area and the lands surrounding Little Mountain. Elk are grazers, and their summer range requirements center around forest opening and edge habitats (Marcot et al. 1994). Compton (1974) found that elk in the

Sierra Madre concentrated their summer use in subalpine parks and found heavy autumn use in aspen cover types. Strickland (1975) noted that subalpine and mid-elevation parks formed the primary summer range of elk. Davis (1977) found that elk on the Medicine Bow N.F. used natural parks and burns preferentially over clearcuts and that burns contained cover that was critical to elk use, which is unavailable in clearcuts. Large clearcuts tend to be of little use to elk, because elk tend not to venture farther than 600 feet from cover (Reynolds 1966, Hershey and Leege 1976). Because parks and burns are more important than clearcuts as summer range, a let-burn approach will do more to maintain and enhance elk summer range than a continuing reliance on clearcutting to provide openings in forested habitats.

Erik Molvar—Biodiversity Conservation Alliance: In terms of value to nesting raptors, areas with cliff topography may be of heightened conservation importance. Full recovery of prairie dog populations would be the optimal outcome for maintaining and recovering raptor populations.

Erik Molvar—Biodiversity Conservation Alliance: In the Red Desert, Maxell (1973) found that prairie dogs were restricted to sagebrush-grass communities with shrub height less than 12 inches and cover less than 40% on loam and clay textured soils. In the Shirley Basin, Orabona-Cerovski (1991) found that average plant cover on towns was 38%, with high amounts of bare ground. These preferences should be borne in mind when evaluating habitats for potential prairie dog recovery efforts. The spatial distribution of prairie dog colonies is an important conservation priority. Clark et al. (1982) made the following observation for white-tailed prairie dogs in Wyoming: “Prairie dog colonies were found clumped in suitable habitat, and nearby colonies served as sources for colonizing animals” (p. 579). The dispersal ability of the white-tailed prairie dog is not great; Orabona-Cerovski (1991) found that less than 1% of juvenile males and 3% of juvenile females dispersed more than 200m from their natal burrows. Thus, maintaining a few isolated colonies is by far inferior to maintaining colony complexes with a high degree of connectivity to facilitate dispersal.

Erik Molvar—Biodiversity Conservation Alliance: In their conference opinion on the Seminoe Road Coal bed Methane Project, the USFWS recommended that activities, which might disrupt denning swift fox, be prohibited between March 1 and July 31 (Long 2001). Denning areas should be identified and protected from any activities that threaten the viability of swift fox populations.

Erik Molvar—Biodiversity Conservation Alliance: In Wyoming, ferruginous hawks have a fairly diverse diet. In a study near Medicine Bow, MacLaren et al. (1988) found that jackrabbits contributed 48% to the ferruginous hawk diet biomass, white-tailed prairie dogs 22%, and Wyoming ground squirrels 16%. Secondary prey may attain paramount importance during prey declines, droughts, and other stochastic events. Secondary prey species become critical to maintaining hawk population numbers when primary prey species crash (Olendorff 1993). Smith and Murphy (1978) found that ferruginous hawk diets shifted increasingly to rodents as jackrabbits became scarce. Thus, it is important to maintain both primary and secondary prey bases to guarantee ferruginous hawk viability over the long term.

Erik Molvar—Biodiversity Conservation Alliance: It is likely that overgrazing is the greatest threat to those raptors sensitive to grazing impacts.

Erik Molvar—Biodiversity Conservation Alliance: Livestock grazing should be managed in a way that does not reduce or impair the viability of elk and mule deer populations.

Erik Molvar—Biodiversity Conservation Alliance: Moratoriums on new water diversion projects and the maintenance of minimum flows in streams affected by existing diversions will ensure that existing populations of this trout will have sufficient water to survive. Special provisions must be made to safeguard the health of aquatic ecosystems. Minimum bypass flow levels must be guaranteed for all trout-

bearing streams to maintain the habitat effectiveness at 80% throughout the year to meet the need of adult fish.

Erik Molvar—Biodiversity Conservation Alliance: Native fishes: While the Great Divide Basin is devoid of native fishes, other watersheds are home to several sensitive endemic species, and these waters contribute in important ways to the waters of the upper Colorado Basin, home to 5 species of Endangered fishes. According to Langner and Flather (1994), 34% of the native fishes in the upper Colorado Basin are threatened, endangered, or extinct. A Section 7 consultation with the U.S. Fish and Wildlife Service will be needed for this plan. Thus, special conservation efforts are needed to protect resident fishes as well as downstream waters.

Erik Molvar—Biodiversity Conservation Alliance: Preserving the biodiversity of rodents is an important consideration in maintaining the prey base for carnivores and raptors, and in maintaining overall ecosystem function. The BLM should investigate population trends of rare or declining rodents and manage to protect their viability.

Erik Molvar—Biodiversity Conservation Alliance: Pronghorn Winter Range Winter range is critically important to pronghorn populations, as its availability and quality are likely the strongest determinants of population dynamics. Barrett (1982) reported that during a severe winter in Alberta, overall pronghorn mortality was 48.5%, with fawns and adult males taking particularly heavy losses. This same study documented that pregnant female pronghorns resorbed their fetuses when conditions were poor. Deep winter snows also decrease the survival rate of fawns born the following spring (Cook 1984). Emergency supplemental feeding in ineffective in promoting pronghorn survival during severe winter weather (e.g., Julian 1973, Barrett 1982). Thus, it is critically important to be sure that the winter ranges are maintained in the best possible condition. Surveys should be undertaken to identify the occurrence and distribution of vagrant lichens of the taxa Aspicilia, Dermatocarpon, Masonhalea, and Xanthoparmelia, occurring in cold deserts in the western U.S. (Rosentreter 1993) within the lands managed by the Rawlins Field Office, particularly in cold desert shrub-steppe habitats and on windblown ridges. Rosentreter (1997) proposed a number of management recommendations for conserving vagrant lichen populations, and we endorse these recommendations. Further study of the distribution and abundance of vagrant lichens on pronghorn winter ranges in the Rock Springs Field Office is needed, and baseline data on these lichens should be included in the Draft EIS for the plan revision.

Erik Molvar—Biodiversity Conservation Alliance: Raptors: Raptor populations are on the rebound following declines based largely on insecticide spraying, predator poisoning programs, and shooting in the 1960s and 1970s. Raptors of special concern include the golden eagle, prairie falcon, peregrine falcon, ferruginous hawk, merlin, and burrowing owl. Because they require large natural areas for survival, raptors may be a good umbrella species for the protection of entire ecological communities (Burnham and Holroyd 1995).

Erik Molvar—Biodiversity Conservation Alliance: Reptiles and Amphibians: A number of rare and sensitive reptile species are likely to occur within the planning area. Germano and Lawhead (1986) found that lizards increased in abundance with increasing patch complexity, indicating that spatial aspects of land management are important to maintaining reptile diversity. Our own field work has turned up eastern short-horned lizards. The midget faded rattlesnake is known from lands south of Rock Springs. And the Great Basin spadefoot has been found near Adobe Town and in the vicinity of Lost Creek in the Great Divide Basin. Baseline information on the distribution and population status of reptiles should be provided in the Draft EIS, which should also address habitat needs and consider Area of Critical Environmental Concern designation for key habitats of rare species, such as the hibernacula of midget faded rattlesnakes.

Erik Molvar—Biodiversity Conservation Alliance: Taylor (1975) recommended that "Fences which cross migration routes should be removed or at least modified to allow ready passage by pronghorns under adverse weather conditions …" (p. 47). Bruns (1977) recommend a minimum clearance of 46 cm and a barbless lower strand for fences. Rosentreter (1997) recommended that fences which could affect pronghorn dispersal be modified so that the bottom wire is smooth (not barbed) and is kept more than 60 cm (24 inches) above the ground. Under the new plan, there should be no new fence construction, illegal fences should be removed, and all remaining fences should at least conform to antelope passage requirements set forth by WGFD.

Erik Molvar—Biodiversity Conservation Alliance: The BLM must maintain the natural habitat conditions found in the Little Snake, namely low base flows and large disparity between base flow levels and peak flow levels, that favors rare native fishes and discourages the invasion of nonnatives.

Erik Molvar—Biodiversity Conservation Alliance: The BLM should manage summer ranges for the benefit of mule deer populations. As part of the EIS, BLM should undertake the Brownian-bridge movement model pioneered by Sawyer et al. (2009b) to identify mule deer migration corridors on the landscape and prioritize them for conservation attention. Due to the sensitivity of mule deer to disturbance on winter ranges and the crucial nature of winter range performance to maintaining healthy deer populations, mule deer winter ranges must be withdrawn from all road construction and development, particularly oil and gas development, which would increase the level of human disturbance on these winter ranges. It is clear that present BLM mitigation measures do not protect mule deer populations from decline in the face of full-field gas development; stronger measures are clearly warranted.

Erik Molvar—Biodiversity Conservation Alliance: The ecological importance of prairie dogs, when paired with their low and declining population levels and imminent threats to colony viability, make the compelling case that strong measures must be put in place to protect and restore prairie dogs in the planning area. Large prairie dog complexes of 3,000 hectares and more, plus a half-mile buffer, should be designated as Areas of Critical Environmental Concern and withdrawn from all surface-disturbing activities with minerals leased only under "No Surface Occupancy" provisions.

Erik Molvar—Biodiversity Conservation Alliance: The maintenance of viable golden eagle populations should be an important consideration in the new RMP, which must provide the full measure of protection accorded by the BGPA. Golden eagle protection is linked with the maintenance and recovery of prairie dog colonies.

Erik Molvar—Biodiversity Conservation Alliance: The new RMP should have as one of its goals to maintain the viability and distribution of all avian species native to the region. BLM should map it to BLM Sensitive Species, such as sage sparrow, sage thrasher, and Brewer's sparrow, and set these areas aside as Areas of Critical Environmental Concern to be protected from oil and gas development and wind power projects. The new RMP should include provisions to monitor cottonwood gallery woodlands for the yellow-billed cuckoo and to manage these woodlands for retention and recolonization of this bird. Prescribed burn projects should be conducted in a manner that does not threaten the viability of sagebrush obligate passerines.

Erik Molvar—Biodiversity Conservation Alliance: The overall landscape-scale effects of widespread industrialization threaten the viability of raptor populations through habitat loss and fragmentation. Nest buffers currently in force are unlikely to safeguard the viability of native raptors in the Great Divide; a more conservative approach is needed in order to safeguard raptor viability in this region. White and Thurow (1985) stated: "We would prefer to see ecosystems kept intact (cf. Wagner 1977) rather than divided into isolated islands set aside for nesting raptors, because aspects of general land use other than restricted areas also affect the health of raptor populations." (p. 21) Thus, not only should nest buffers be

implemented, but the overall integrity of the landscape should be maintained (or improved in areas where it is currently degraded) in order to better provide for raptor viability.

Erik Molvar—Biodiversity Conservation Alliance: The restoration of beavers to their native habitats has many benefits for aquatic ecosystems. Apple (1985) reported that the restoration of beavers resulted in dissipation of stream flow energies and raising of water tables along Sage Creek in the Rawlins Field Office. In this study, the combination of beaver reintroduction and rest from grazing resulted in a 20% increase in avian species richness. The Rock Springs BLM should emulate the Rawlins Office's efforts to reintroduce beaver to streams where it once occurred.

Erik Molvar—Biodiversity Conservation Alliance: The wide-open spaces of the Red Desert and Green River Valley are a haven for major concentrations of pronghorn, which must be granted adequate protection to ensure the continued survival and vigor of the native herds and to ensure that the natural patterns of their migrations are not further altered. In addition to the importance of shrubs in the pronghorn diet, shrubs provide cover important for the survival of newborn fawns (Yoakum 1986). But Kindschy et al. (1982) reported that pronghorns avoid areas where sagebrush is tall.

Erik Molvar—Biodiversity Conservation Alliance: There is currently no effective method to control the spread of plague in prairie dog colonies. Because prairie dogs in the planning area may already be stressed by endemic or epidemic levels of sylvatic plague, stronger conservation measures are needed to prevent impacts from activities that can, in fact, be controlled and managed by BLM.

Erik Molvar—Biodiversity Conservation Alliance: Wildlife Habitat and Fisheries Management: (1.) Broad stretches of undeveloped landscape should be maintained in a well-distributed pattern throughout the planning area. (2.) All management activities shall be done in a manner compatible with maintaining thriving populations of BLM Sensitive Species and other plants or wildlife classified as rare or declining. (3.) Wild horse numbers should be managed at sustainable levels, taking into consideration impacts to wildlife, habitats, and rangelands. (4.) The BLM shall protect habitat so as to maintain the viability of all native species widely distributed throughout the planning area. (5.) All management activities should prevent soil erosion and compaction and maintain or restore biological soil crusts over the long term.

Erik Molvar—Biodiversity Conservation Alliance: Winter Ranges: These areas will address specific habitat needs of plant and wildlife species, particularly crucial winter, migration, and birthing areas used by elk, deer, and bighorn sheep. Prescribed burning has been shown to improve browse quality on winter ranges (Bunting et al. 1984, Gruell et al. 1984, Cook 1990), and thus management objectives will be attained preferentially through prescribed burning. Thomas et al. (1988) asserted that hiding and thermal cover are critical components of elk winter range and that patches of cover greater than 200m wide are more effective than smaller blocks. With this in mind, extensive security areas composed of forested habitat must be retained on winter ranges.

Peter Nelson—Defenders of Wildlife: Defenders suggests that the legal and regulatory context of the RMP planning process provides ample direction to BLM to fully assess threats to wildlife, to engage in smart wildlife planning and management to provide for these valuable resources, and to effectively monitor the results of these activities.

Peter Nelson—Defenders of Wildlife: Ultimately, the NEPA process is designed to increase the quality of decision-making. The NEPA documents produced for this planning process must show what impacts will occur under each alternative so that the alternatives can be compared with each other. To succeed at this analysis, wildlife mitigation measures within the proposed RMP must be tied to clear standards and criteria so that the effects of mitigation can be measured in the EIS. This will allow for a complete assessment of the impacts of the proposed plan alternatives on wildlife to be fully assessed and

understood. Defenders recommends that the clear standards and criteria be used to assess the direct, indirect, and cumulative impacts of the proposed RMP on wildlife.

Peter Nelson—Defenders of Wildlife: We would like to point out that new monitoring techniques being developed within the BLM hold great promise to define ecological baseline data and determine status for many sensitive species. The BLM's flagship monitoring program for their new National Monitoring Strategy is detailed in Kotliar et al. 2008 (http://pubs.usgs.gov/of/2008/1024/), where it is applied to create a regional approach to wildlife monitoring in oil and gas development areas in Colorado. This framework is quite flexible and has already been adapted for use in the White River Field Office in Colorado. Despite the fact that the National Monitoring Strategy has not yet been completed, its utility at the field office level has already been demonstrated in Colorado, and the Rock Springs Field Office should follow this model. Defenders recommends that BLM develop wildlife monitoring protocols for the Rock Springs RMP consistent with the planning regulations and handbook, and that BLM use the flagship monitoring program described above as a guide in this development.

Peter Nelson—Defenders of Wildlife: While this process occurs after the plan has been developed and implemented, the handbook indicates that, "In some cases, the RMP/ROD may have identified both monitoring and evaluation measures; units, and programs, and may even have specified the monitoring/evaluation questions to be answered." This implies that evaluation criteria need not necessarily be incorporated at the RMP planning stage. However, planning regulations state clearly that the "plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan." (43 C.F.R. 1610.4-9) As BLM develops evaluation criteria, three of the questions included in the handbook will be particularly important for successful evaluation of wildlife management: Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis? Are there unmet needs or new opportunities that can best be met through a plan amendment, or revision, or will current management practices be sufficient? For example, are there outstanding requests for ACEC designations to protect resource values? (p. 34-35) The first question allows the consideration of further wildlife mitigation, depending on how successful measures have been up to the point of evaluation. The second question is vitally important because of constant shifts in technology and information related to wildlife data that could provide great improvements in wildlife management over time. The third allows for examining the possibility of changes to the overall RMP in order to provide further protections for wildlife to meet plan objectives. Incorporating these and similar questions into an evaluation program now can guarantee that vital wildlife issues will be addressed throughout the life of the RMP. Defenders recommends that the Rock Springs RMP/ROD, in compliance with the planning regulation, identify evaluation measures through this Land use planning process using the recommended questions as a guide.

Michael N. Rudoff: Less fencing is far better than more fencing to encourage the open migration of game animals, and continuing hunter access must be maintained to promote and maintain healthy herd numbers of all manner of game animals.

Phillip Schlagel—Anadarko Petroleum Corporation: Anadarko recommends that the planning amendments must not become so prescriptive that incorporation of new and evolving science and data into management of sagebrush habitats would be prohibitive or unnecessarily restricted absent new planning decisions. It is also important that BLM recognize that the establishment of Wyoming's Core Population Area Strategy (Strategy) occurred via an Executive Order issued by the Governor of Wyoming. Because of this, it is subject to change by either the current Governor or subsequent administrations. For example, boundaries of core areas, connectivity management designations and habitat management recommendations can all be amended going forward. BLM must ensure that it does not memorialize the Governor's Executive Order to such a degree that even small changes to the Strategy

will require planning amendments. BLM's Sensitive Species management goal (BLM Manual 6840) is to "To initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA." Prior to the addition of additional special Greater Sage-grouse habitat areas, above those core areas established through the Strategy, where enhanced protections would be applied, the BLM must scientifically demonstrate that Strategy fails to minimize the likelihood and need for listing. Of note, Wyoming's Strategy has been developed with participation from the U.S. Fish and Wildlife Service, and they have recognized the Strategy as meeting the necessary conservation measures to preclude the need to list. (USFWS letter to Governor Freudenthal May 7, 2008) Finally, BLM should refrain from utilizing the Wyoming Game and Fish Department's (WGFD) "Recommendations for Development of Oil and Gas within Crucial and Important Wildlife Habitats" (Recommendations) as the basis for development of significance criteria. BLM must first take into account the conservation benefits derived from adopting the Strategy on a statewide basis. By design, the Strategy allows for dissimilar impacts to respectively occur to Greater Sage-grouse population inside and outside of core areas. This divergent management approach will occur while providing the necessary conservation benefits to minimize the likelihood or need to list. Thus, the WGFD Recommendations may no longer be applicable to non-core populations.

Russell A Spencer—Azalea Oil Company, LLC: The BLM should map crucial winter range and winter range for each of the big game species within the planning area. Each species has vastly different habitat types and needs, and each responds differently to temporal occupancy and potential stresses. The Operators must be able to determine what species may be impacted and whether there are overlapping crucial winter habitats.

John Spezia: We need stronger protection for sage grouse breeding areas and big game winter ranges, including "No Surface Occupancy" for industrial uses.

GENERAL

Lorna Anderson: Please set aside tracts of land for recreational, habitat, and uses other than industrial use. In those areas where industrial use is allowed, please limit density of impact and ensure mitigation to habitat.

Pete Arambel: The BLM should continue a multiple use based management policy on their lands.

Aaron Bannon—National Outdoor Leadership School: Accompanying these written comments is a map with NOLS campsites visited during a season of use, an outline of our operating area, and an outline of the viewshed that is visible during a backcountry horse packing experience. We have also included GIS files of this data. We are hopeful that this additional data will provide the Rock Springs BLM with a crisp picture of backcountry recreation use in the Jack Morrow Hills.

Colleen Cabot: It is very important to me that BLM recognize and protect the wildlife and cultural resources throughout the area surrounding Boars Tusk, Steamboat Mountain and the Killpecker Dunes. This is a priceless and unique high desert biome, with the world's largest active sand dune system and the wildlife oasis of the high ridges.

Andrew and Nancy Carson: In brief, we strongly urge the BLM to preserve the wilderness nature of the Red Desert region for now and for future generations.

Andrew and Nancy Carson: We ask to be included in further mailings and public commentary on this topic.

Kent Connelly—Coalition of Local Governments: The requirements of the Healthy Forest Restoration Act of 2003 should be the basis for improvement and treatment of forest stands and collaboration with local governments for fire suppression. Forest resources within the project planning area are typically found within inter-mingled lands. There are serious beetle infestations and disease. BLM needs to cooperate more fully with state plans to address the risks of catastrophic wildfire. Otherwise catastrophic wildfire will threaten water sheds, soils, and water resources that are essential for livestock operations, communities and other land uses. Allowable timber harvest should be based on multiple use and sustained yield, recognizing that timber production is a principal multiple use. Timber should be more than a forest treatment. In addition to commercial harvest, the plan should also provide for harvest of firewood, Christmas trees, post and poles and other forest products commonly available to the public by permit or free use. Forest should be managed to protect watersheds from conifer invasion or dominance in order to maintain or enhance water yield and quality. Forest should be managed to provide for a mosaic of seral stages age class, structure and not to be managed for dominance of one particular age class. To prevent the waste of forest products and support local economies, timber harvest should be given priority over other treatments of forest resources. The plan should provide for the protection and enhancement of aspen in support of healthy habitats and watersheds.

Kent Connelly—Coalition of Local Governments: The RMP must make a specific commitment to monitoring the RMP actions by building into the annual work plan the necessary funding to monitor and evaluate each RMP component. For example, monitoring needs to address the impacts of wildlife, big game numbers, and wild horses on meeting, maintaining or making progress towards meeting the rangeland health standards. This should be a multi-year project that also evaluates the interaction of wild horses with big game. Additionally, BLM needs to cooperate closely with grazing permittees in joint monitoring. Another aspect of monitoring is to address effectiveness of mitigation and reclamation policies. It is not sufficient to adopt numerous measures without ever considering whether they are achievable or effective. The State of Wyoming has facilitated a process to consider better reclamation

guidelines. The CLG members hope that the RMP would also consider these guidelines as a starting point when evaluating what works and what does not. All project level plans implementing the RMP should contain a monitoring plan that will provide for trend, impact, and management adequacy and to be used as a basis for adaptive management. But the monitoring plan must be detailed and address the major public land uses.

Joshua W.D. Coursey—Greater Little Mountain Coalition: Before development of any kind is allowed, baseline information for terrestrial and aquatic species is needed. Vegetation data would also prove beneficial to have before any development ensues.

Nada Culver—The Wilderness Society: In another example, the St. George Field Office (Utah) employed GIS technology to assist commenters on the route inventory at open houses for its travel management planning process, which helped the public make substantive comments on routes. After the scoping meetings: In another example, the St. George Field Office (Utah) employed GIS technology to assist commenters on the route inventory at open houses for its travel management planning process, which helped the public make substantive comments on routes.

Nada Culver—The Wilderness Society: In order to adopt a legitimate, efficient and effective science-based planning framework, the Rock Springs Field Office should look to the well-established conservation planning and population viability assessment literature, as well as models employed by other BLM units and neighboring agencies.

Nada Culver—The Wilderness Society: Recommendation: BLM should incorporate a Health Impact Assessment (HIA) into the Draft RMP for the Rock Springs RMP.

Nada Culver—The Wilderness Society: Recommendation: BLM should use the information provided in Appendix 1 (The Wilderness Society's recent Science and Policy Brief, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands") to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Rock Springs RMP.

Nada Culver—The Wilderness Society: Recommendation: In considering the need and ways to manage these lands to protect the many resources of these public lands, the agency must consider the cumulative impacts from regional oil and gas development and the cumulative impacts to adjacent lands from oil and gas development. This analysis should inform the manner in which BLM allocates lands as available or unavailable for oil and gas development and the conditions under which development may be permitted.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP should adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e., fish and wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations. Specifically, the RMP should put in place management actions to protect sage-grouse that are based on the most recent science and provide for adapting to emerging science.

Nada Culver—The Wilderness Society: The effective application of science to land management planning and decision-making requires three "essential ingredients": Well-defined, measurable standards (e.g., wildlife population or habitat condition targets), developed via robust public involvement processes. The employment of science-based analytical tools to evaluate compliance with the standards (e.g., population viability analysis or the spatially explicit Decision Support System recommended by the Western Governors' Association). Consistent implementation of science-based analysis and decision-making (i.e., dedicated funding for monitoring and science-based adaptive management processes). (8.)

The Rock Springs Field Office should consider these essential elements as it moves forward with efforts to respond to the pressing land management challenges of the coming decades.

Jean Dickinson—Vermillion Ranch Limited Partnership: VRLP incorporates by reference the Coalition of Local Governments scoping comments on the Rock Springs Resource Management Plan.

Nick Dobric: The Rock Springs district offers immense energy resources that need a certain level of accessibility, however, the area available to leasing appears to be skewed more towards energy development and not in line with the multiple-use mandates for managing public land. The areas that are selected to be unavailable to energy development should be based on big game winter habitat, calving grounds, important sage grouse areas (Governors Core Habitat), Wilderness Study Areas (both agency and citizen identified), culturally-rich sites, and Areas of Critical Environmental Concern (ACEC).

Rita Donham: Please work hard to collect scientific data about all the wonderful above-ground features and living creatures of the Red Desert. A thorough EIS should actually take 5 to 10 years on the huge Red Desert.

John Emmerich—Wyoming Game and Fish: Increasing demands for energy development and other land uses in the lower Green River watershed cumulatively threaten water quality and physical habitat in this crucial habitat area. Cumulative land disturbances yield heavier sediment and phosphorus loading of the Green River and Flaming Gorge Reservoir encouraging eutrophic aquatic conditions and/or accelerated sediment deposition that deteriorate habitat quality for aquatic wildlife. Moreover, there are also threats of large-scaled industrial chemical or petroleum spills that could negatively affect water quality and fisheries. The RMP should recognize this cumulative landscape impact to watershed health and function, and RMP management objectives and actions should be written to address the issue.

John Emmerich—Wyoming Game and Fish: The RMP should provide responsible guidelines for management strategies on how to evaluate and manage for cumulative effects of multiple uses on the landscape.

John Emmerich—Wyoming Game and Fish: We recommend management decisions be based on current and sound scientific principles. While we support adaptive management principles, we do not support adaptive management schemes without a commitment for complete follow-through. Additionally, we continue to request and support the notion of cumulative impacts analysis on any proposed impact.

John Emmerich—Wyoming Game and Fish: We recommend that management decisions be based on adequate monitoring and subsequently that the RMP describe monitoring requirements for all resource management actions.

Jason Fearneyhough—Wyoming Department of Agriculture: Checkerboard: The decisions BLM makes in the RMP must acknowledge the large amount of “Checkerboard” land pattern in the RSFO planning area. The WDA encourages the RSFO officials ensure RMP decisions only pertain to public lands and acknowledge proposed actions and decisions will have significant direct impacts on livestock grazing permittees and the potential to negatively impact private landowners in the “Checkerboard” section of the RSFO. In addition, indirect impacts of the RMP will affect not only permittees but also local communities throughout the planning area and Wyoming as a whole.

Jason Fearneyhough—Wyoming Department of Agriculture: Glossary: Glossary definitions are extremely important to the actual uses and meanings of those defined terms in the RMP. The definition for surface disturbance is particularly significant for livestock grazing. Overly broad definitions create unintended consequences. WDA recommends planners and cooperators utilize and evaluate the “surface-

disturbing activity" definition provided in BLM Information Bulletin No. WY-2007- 029. We also urge BLM to consider the definitions for "wildlife disturbing activity," "disruptive activity" and similar terms.

Jason Fearneyhough—Wyoming Department of Agriculture: Multiple Use Management prescriptions in the RMP must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM-administered lands. These should be an integral part of the RMP. WDA particularly believes the Congressional policy expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing needs to be specifically noted in the RMP. FLPMA Sec. 102(8) states, "The Congress declares that it is the policy of the United States that ... the public lands be managed in a manner … that will provide food and habitat for fish and wildlife and domestic animals …" We have learned through experience in working on previous RMP revisions that many in the public are unaware of this Congressional policy. Yet this policy is critical to the continuation of livestock grazing in the planning area. It is critical FLPMA is expressed in the RMP.

Jason Fearneyhough—Wyoming Department of Agriculture: Peer-Reviewed Science: Peer-reviewed science and best available data must underlie all decisions made in the RMP/EIS. The EIS must identify the site-specific science and monitoring data supporting the decisions and discussions regarding this planning effort.

Lydia Garvey: It's highly inappropriate to destroy this precious, spectacular, unique, world heritage wilderness area. I strongly urge NIX of All 'development'/resource extraction!

Wyatt Hanks: Greater enforcement of exiting rules and regulations on public land, especially regarding dumping trash, driving off trail, poaching, etc.

Wyatt Hanks: I work in the oil and gas industry and get to travel all around the areas that this RMP will cover for my job. I also enjoy recreating on the same public lands in Sweetwater County in the form of 4x4 exploring (on road/trail), camping, hiking, backpacking, ski touring, hunting, and visiting historical sites. I love the beauty and expanse of every inch of the Red Desert. I treat the environment with respect by leaving as little trace as possible, not driving off existing roads and trails, and picking up after myself. I do this for two reasons. I love the area - I want to keep it pristine - and I love my right to recreate and use public lands - I don't want areas to be closed because of damage from careless abuse. Of course I also rely on public lands being open to industry as a matter of course for my job. And though my interests might seemingly conflict with each other (recreation and industry) when it comes to managing public lands, from what I have seen in my extensive exploration in the Red Desert, I have found that the oil and gas industry, along with all the other industries on the public lands, including ranching, mining, power generation, power transmission, and signal transmission, have thus far had little to no effect on my enjoyment of the outdoors in the Red Desert. I do not think these industries are significantly impacting the beauty, the solitude, the wildlife, or the ecosystems in this area. I think this is partly because of the environmental stipulations that the various industries are required to follow, however more importantly, these industries are already relatively low impact and Southwest Wyoming has more than enough room to fit it all in while maintaining its beauty. Thus far, overall, I think the BLM has done a good job managing the area for multiple use, and they should keep doing what they are doing.

John Hay, III—Rock Springs Grazing Association: It is RSGA's understanding that the document will be prepared by a BLM environmental contractor. Environmental contractors, especially non-resident contractors, have limited knowledge of the area and its resources, and especially checkerboard management. RSGA is willing to participate in detailed discussions to inform the contractor of RSGA's perspective of the unique checkerboard situation and the role RSGA and Anadarko Petroleum share in the management of the checkerboard lands to be included in this RMP.

John Hay, III—Rock Springs Grazing Association: RSGA extends scoping comments above to apply to solid block BLM ownership where all public lands should be managed for multiple uses of resources and access to those resources for the benefit of the State of Wyoming and the Nation.

John Hay, III—Rock Springs Grazing Association: The RMP must include full disclosure for the unique management prescriptions for the checkerboard lands of BLM, RSGA and Anadarko Petroleum wherein the minority ownership is federal. The RMP must be expanded to highlight and include specific discussion on the agency authority for management actions within the checkerboard area. Clarify how recommended management practices will be implemented so to not directly or indirectly impact on private property rights. The RMP must be specific to reflect private property rights, especially in regards to BLM recommendations for cultural resources, historic trails, seasonal restrictions, crucial winter ranges, view sheds, visual resources, wind energy, wild horses, reclamation standards, and invasive species.

John Hay, III—Rock Springs Grazing Association: There are unique issues with implementation of the public and private management goals with checkerboard land pattern. The RMP Revision should be designed to include specific chapters, within the various alternatives, regarding the checkerboard. Implementation of final various resource decisions may or may not be feasible if there are conflicting private and public interests. The RMP Revision must fully disclose how the BLM intends to extend authority and influence to implement BLM management actions on the private land in the checkerboard. Discussion must include, but should not to be limited to, Wild Horses, View shed Analysis, VRM Class II, Sage-Grouse Core Areas, Wild Lands, Energy Corridors, Critical Habitat, Seasonal Restrictions, and others. RSGA is not a signature authority to the RMP and BLM cannot assume their management prescriptions will be adopted by RSGA or other land owners.

Liz Howell—Wyoming Wilderness Association: The JMH ROD provides that "[a]n implementation, monitoring, and evaluation process, including an interdisciplinary monitoring plan, will evaluate the overall effectiveness of implementing the management decisions for the planning area and will be used as a basis for making management adjustments." (JMH ROD at 6.) In a past filed protest of the ROD, groups determined that no "interdisciplinary monitoring plan" had been developed or put in place for the Jack Morrow Hills planning area and further planning has never been completed, and thus there is no "interdisciplinary monitoring plan" in place to guide management decisions as required by the JMH ROD. WWA would like to see in this RSRMP evidence of appropriate monitoring of any and all actions of the past 10 years.

Michele and Robert Irwin: The 3.6 million acres that the Rock Springs Field Office is tasked with managing is our home. We live here (on a working cattle ranch along the Green), work here (trona industry), and recreate here (hunt, ATV, camp, etc.). The public lands don't belong to us, but to all Americans. These lands are also part of a larger global landscape. The big picture must be managed for the beneficial use for all living creatures, of which man is but a part. We are alike in our need for life sustaining clean air, water and habitats. Considering this task, we recommend that the new Resource Management Plan include adaptive management based on the latest reputable scientific knowledge available to manage this region for a healthy and sustainable sage steppe ecosystem, within the larger global context.

Laura Koval—Fidelity Exploration and Production Company: BLM should clearly state its multiple use mandate as defined by FLPMA (43 USC 1702[c]), (i.e., support commodity development as well as recreational use and responsible environmental management).

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Minimize uncertainty - The diverse user base heightens the potential for conflict. A primary goal of the review process is to balance

responsible development while protecting wildlife habitat. The RMP process is ideally suited to identify key areas for specific purposes, including areas that might be best suited to development of natural resources. There is, for example, a good understanding of the range of the midget faded rattlesnake. It is relatively simple to avoid conflicts that might impact that species. At the same time, there is a clear definition of existing corridors (electricity, pipelines, highways, etc.). It makes sense to continue to concentrate development activities in these zones. To that end, it would be preferable to have a finite number of large corridors, rather than numerous small corridors. Areas of particular concern for wildlife, livestock, and other uses should be addressed in a similar manner. Simply put, by managing for the things we know, we can reduce or eliminate debate over "unknowns" that most commonly block proactive management for multiple uses.

Matthew H. Mead—Governor of Wyoming: Mountain Landscape. Regional Considerations - Because this area spans three state jurisdictions and several BLM and Forest Service management units, it is desirable that the RMP contemplate and address regional issues, such as management of elk, travel management, particular habitat types, and continued grazing land management.

Carl Millegan—U.S. Fish and Wildlife Service: Seedskadee NWR needs to be included and considered in all actions from grazing management to mineral extraction when these activities take place directly adjacent to the refuge. Seedskadee NWR is asking the BLM to create a two-mile minimum buffer around Seedskadee that significantly limits or completely defers activities that impact resources such as water quality, fish and wildlife habitat giving special consideration to threatened, endangered and candidate species that rely on the resources within Seedskadee NWR for their survival. The Bureau of Land Management should also take into consideration the primary wildlife purposes for which Seedskadee NWR was established within this two-mile buffer area around the refuge. This is not to say that BLM should follow refuge system laws and policies but should give the purposes for which Seedskadee was established special consideration when making resource management decisions that could impact refuge resources. The refuge understands that there are already significant resource issues within this proposed two-mile buffer, and there has already been a significant amount of leasing for gas and oil in the area. In the future, if leases are developed, the refuge is requesting that where development takes place, within half a mile of the refuge bound, that the developer conduct water quality and wildlife use monitoring to determine if water resources, terrestrial wildlife resources, air quality, and cultural and historical resources within the area of the refuge are being impacted and take steps to connect or mitigate those impacts. Currently there are several oil and gas wells located directly adjacent to the refuge (within 1 mile) that have open pits, and it is unknown if resources are being impacted by these wells. It is also uncertain if any testing to determine if resources are being impacted is being done.

Carl Millegan—U.S. Fish and Wildlife Service: The refuge is also asking BLM to incorporate Seedskadee NWR into their plan that informs the public that the refuge lies within the district and that the Fish and Wildlife Service has management authority of those lands. This is a good way to inform people that there is an area within the district that has wildlife-specific purposes and special refuge regulations. In the past RMP, the refuge is not given consideration, and in many cases, since it is not mentioned in the RMP, it gives the impression that the refuge is another part of BLM lands and falls under the same set of rules laid out in the RMP.

Garry Miller—TransWest Express, LLC: On May 28, 2010, BLM announced its intent to prepare RMP amendments with an associated EIS for six field offices in Wyoming, including the RSFO (see 75 FR 30054), to revise greater sage-grouse and sagebrush management. TWE submitted scoping comments on the proposed RMP amendments by letter dated August 30, 2010, addressed to Chuck Otto, Project Coordinator in the Wyoming State Office. This letter incorporates the substantive comments from our sage-grouse RMP amendment scoping comment letter, and we trust that the BLM will consider all

comments received concerning the sage-grouse and sagebrush management RMP amendment in its RMP revision.

Neil and Jennifer Miller: When we travel through this area, we marvel at the diversity of the landscape: The Jack Morrow Hills, Oregon Buttes, Historic Trails, including the Tri-Territorial Historical Site, Oregon Buttes, Boar's Tusk, Steamboat Mountain, White Mountain and the petroglyphs, Little Mountain, the Red Desert, Killpecker Sand Dunes, and Devil's Playground. This land is a great recreation area including hunting and fishing, wildlife viewing, hiking, appreciating wildflowers and desert plants, following historical trails, and exploring archaeological and paleontological sites. We want a plan that places these values as paramount when considering mining, oil and gas development as well as livestock grazing and wind energy development.

Erik Molvar—Biodiversity Conservation Alliance: (1.) Using a project area boundary for cumulative effects analysis has no biological or geophysical basis and should not be done; and (2.) Field Office boundaries, which are based on land ownership and political considerations are also inappropriate units upon which to base cumulative effects analyses. WGFD (1995) recommended the appropriate scope for cumulative effects analysis on various wildlife and habitats, and we urge the BLM to set the scope of the agency's cumulative effects analyses according to these recommendations. Valid cumulative effects analyses must, therefore, encompass whole populations or subpopulations in terms of wildlife, entire watersheds in terms of aquatic resources, and entire air sheds for air quality assessments.

Erik Molvar—Biodiversity Conservation Alliance: A keystone to maintaining ecosystem health is to maintain sufficient habitat to guarantee the viability of all native species broadly distributed throughout the Rock Springs planning area. The BLM should adopt this philosophy as an ironclad requirement in the new RMP. We further urge the BLM to adopt an Ecosystems Management approach to all permitted activities and projects in the planning area.

Erik Molvar—Biodiversity Conservation Alliance: Adaptive Management Strategy (1.) Recognizing that the costs of monitoring and mitigating for private uses on the public lands often outstrip the agency's resources, the RMP will contain a schedule for re-evaluating the ability of BLM to achieve the non-commodity resource goals contained in the RMP. If those goals are not, or cannot be met, the RMP will outline how BLM will adapt its management of the Resource Area in order to ensure preservation of wildlife, scenic, and recreational values.

Erik Molvar—Biodiversity Conservation Alliance: BLM needs to address conservation of core habitats and connecting corridors through the Rock Springs RMP revision, and we urge the BLM to adopt the Heart of the West Conservation Plan, a science-based blueprint for the Wyoming Basins Ecoregion (of which the Rock Springs Field Office is a part) as a framework for determining where and under what conditions development should occur in the Rock Springs Field Office.

Erik Molvar—Biodiversity Conservation Alliance: Forest Management: (1.) The new RMP should outline standards and guidelines for timber harvest that require harvest to be sustainable over time and compatible with other multiple uses such as wildlife, recreation, and watershed values. (2.) Timber harvest rotations should reflect natural stand turnover before the advent of widespread logging. (3.) The RMP should ban clearcutting and seed-tree harvest in favor of group selection, individual tree selection, and three-stage shelterwood harvests to minimize additional forest fragmentation. (4.) No new timber roads should be constructed in lands proposed for wilderness designation, lands where three or more wildlife migration corridors and crucial habitats coincide, and lands requiring NSO stipulations for leased minerals. (5.) For timber sales, a minimum of 5 snags/acre of the largest diameter available will be retained to enhance wildlife habitat.

Erik Molvar—Biodiversity Conservation Alliance: In the new RMP, a thorough analysis of the cumulative impacts of oil and gas development, not just in the planning area but across the Red Desert and other neighboring ecosystems as a whole, is needed.

Erik Molvar—Biodiversity Conservation Alliance: The BLM shall undertake a systematic program of periodic monitoring of resources and attributes, including but not limited to grazing levels, biological soil crusts, sage grouse populations, burrowing owl populations, extent and occupancy of prairie dog colonies, and population trend of Sensitive Species.

Erik Molvar—Biodiversity Conservation Alliance: The maintenance of biodiversity must occur on a regional scale. In some cases, individual projects may not measurably decrease plant and animal diversity on a local scale, but if rare species with specialized habitat requirements disappear from the landscape, the overall regional biodiversity goes down. This relationship is particularly important when considering the effects of broad-scale habitat conversion and fragmentation. Thus, the new RMP should include a standard requiring the maintenance of appropriate habitat to support the viability of all native species throughout their native habitats.

Erik Molvar—Biodiversity Conservation Alliance: Thus, as the juniper woodlands of the region abut Wyoming big sagebrush communities, it is unlikely that current distribution of juniper woodlands in the planning area represent an unnatural or aberrant state of affairs. Some hypothesize that juniper woodlands can have a measurable effect on the hydrology of the lands where they are found, but this hypothesis is poorly supported by scientific evidence. In Oregon, Wigand (1987) studied pollen records and concluded that juniper woodlands expanded with the onset of greater precipitation and high water tables from 4000-2000 B.C. Conversely, drought causes contraction of juniper woodlands (Miller and Wigand 1994). This suggests that the distribution of juniper woodlands is at least in part dependent on changes in climate. Eddleman and Miller (1982) found that junipers have a significant effect on the upland hydrologic cycle through increased interception of rain and snow and increased transpiration but that impacts to subsurface flow to riparian aquifers were questionable. Belsky (1996) asserted that pinion-juniper removal does not increase water yield and that juniper removal does not always result in increased forage production. With these findings in mind, and given the biological importance of juniper woodlands (discussed in detail under the Proposed Powder Rim ACEC section), intensive management of or reductions in juniper woodland habitat types is not warranted.

John Pallesen: The problem that I see with the areas of concern here is habitat fragmentation. With all the new development situations in our county wind, oil and gas and even subdivision, habitat is being chopped up into little squares. Roads, fences, power lines, pipelines, etc. are providing the lazy people with easier ways to get around. If you have ever been antelope hunting east of Kinney Rim, the antelope are running back and forth between vehicles. It is getting the same way south of Rock Springs…very sad. They say to lobby for responsible energy development, but I don’t think there is such a thing. I have worked for energy before as a wildlife-range biologist….their goal is the bottom line…. money.

Kathleen M. Sgamma—Western Energy Alliance: Oil and natural gas development does not preclude other multiple uses. Once a well is drilled, which usually takes several weeks, interim reclamation can begin to occur and the land is once again available for hunting, hiking, and other recreational purposes. Once wells are plugged and abandoned and final reclamation occurs, the disturbance to the land can be barely discernible.

Julie Sharp—National Park Service: The National Park Service has reviewed the Rock Springs Field Office Resource Management Plan and determined that no parks will be affected; therefore, we have no comments.

Russell A Spencer—Azalea Oil Company, LLC: All multiple users of the Rock Springs Resources Area should be treated equally.

Russell A Spencer—Azalea Oil Company, LLC: The BLM should be flexible in prohibiting or restricting activities in areas of sensitive, highly erodible, and excessive steep slopes or greater without adequate mitigation developed for site-specific erosion control. A lack of flexibility will serve to reduce or eliminate all surface disturbing activities on areas with slopes over 10%.

Lee Splett: Cumulative Impact: The document must require that the cumulative effects of combined and on-going processes in aggregate, such as multiple well fields and all additional fields, along with all pipelines, power lines, wind farms, mining, roads, including existing public roads, grazing and public uses occurring in a given area, basin, watershed, or air shed as well as the effects that these processes, will have on adjacent areas, basins, watersheds, or air sheds.

Larry Svoboda—EPA Region 8: Oil and gas development, recreational use, grazing, and related activities are among the planning activities requiring management, mitigation, and monitoring. Various impacts can be minimized or potentially eliminated if BMPs and other mitigation measures are properly implemented. Consistent with the Council on Environmental Quality (CEQ) recently issued final guidance on the "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Findings of No Significant Impact" (CEQ, January 14, 2011), details should be provided for accomplishing these activities in the RMP/EIS. Also, it is important to specifically designate what entity (e.g., BLM, the proponents, resource organizations, or some combination) will be in charge of which activities, and which will have specific enforceable accountability. In addition, the BMPs, mitigation measures and other related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. Please provide details on the issues discussed above in the EIS, preferably in a separate monitoring plan. It may be appropriate to have commitment for these activities placed in the ROD.

Neil Thagard—Theodore Roosevelt Conservation Partnership: Accountability entails accepting responsibility for actions. On public lands, promises are made through various decision strategies and should be considered "contracts with the people" that mandate proper stewardship of the nation's lands and minerals. TRCP recommends that you: Proactively address fish and wildlife management needs with a specific "conservation strategy" for each energy field or project. Finalize conservation strategies before development starts and specify recommendations and actions to minimize impacts and establish plans for mitigation, detailed monitoring and adaptive management. Establish and update regularly a system of tracking commitments, in plans or agreements, along with any actions contrary to those commitments. Ensure that laws, regulations and policies intended to conserve and protect fish and wildlife during energy development are not abdicated or abridged. Utilize lease development plans or master lease planning to evaluate and address potential impacts to fish and wildlife prior to development. Notify the public and allow public comment on energy development projects involving public lands or resources. Provide the public with information regarding modifications to current development plans.

Neil Thagard—Theodore Roosevelt Conservation Partnership: Coordination is essential in ensuring that fish and wildlife are properly managed, within and across administrative boundaries. All stakeholders must be involved, and experts that manage fish and wildlife at the local, state or national levels must be included in energy project planning and implementation. Coordination enables unanticipated or unforeseen actions that arise during development to be addressed in a timely and appropriate manner. A key stakeholder in the administration of public lands and fish and wildlife resources, the public must be included to build trust and brainstorm management tactics. TRCP recommends that you: Foster broad-

based coordination between fish and wildlife managers, landowners and affected stakeholders to ensure fish and wildlife sustainability. Establish expanded coordination across geo-political boundaries between property owners (public and private). Ensure that managers consider the crucial habitats as well as movement or transitional corridors of fish and wildlife. Coordinate among all affected stakeholders during planning and implementation of public-lands energy projects. Include state fish and wildlife agencies in energy development planning and the monitoring of fish and wildlife during and after development. Establish a process for annual review and adjustments of actions that affect fish and wildlife. An adaptive management strategy is appropriate, if based on established adaptive management guidelines and science.

Neil Thagard—Theodore Roosevelt Conservation Partnership: Funding is required for adequate fish and wildlife management. Historically, fish and wildfire programs are underfunded or rely on funding sources other than federal monies. While funding alone will not solve the problem, it plays a critical role in our ability to balance energy development with the needs of fish and wildlife. Funding must be secure, substantial and properly allocated to make a difference. TRCP recommends that you: Determine adequate funding for sustainable fish and wildlife management, including monitoring, in areas proposed for energy development. Prior to development, identify and secure appropriate funds for fish and wildlife monitoring and mitigation, including compensation if necessary or required. Establish a long-term, dedicated "mitigation trust" to benefit fish and wildlife that is funded by royalties, rents, fines or voluntary payments. Ensure that funds designated and intended for fish and wildlife management are not redirected to other causes. Work cooperatively with various funding sources to leverage additional federal or state grants.

Neil Thagard—Theodore Roosevelt Conservation Partnership: Science is the foundation of sustainable land and resource management. It is essential to understanding how fish and wildlife react to energy development and maintaining sustainable populations during and after development. Utilizing peer reviews and published science enables a balanced approach that sustains both energy and fish and wildlife instead of either energy or fish and wildlife. TRCP recommends that you: Utilize science in all fish and wildlife decisions, particularly when specific research has been conducted on the impacts of energy development. Ensure that mitigation and monitoring based on new scientific information is implemented in the energy development process. Incorporate science-based mitigation, using tested and proven methods of adaptive management, when making decisions about fish and wildlife management and energy development. Identify and address "gaps" in science prior to development and implement coordinated research to address these gaps. If necessary, utilize a third-party review of development and mitigation proposals. Establish a credible and qualified "science review team" and engage science-based organizations for fish and wildlife management and development decisions. Establish a process to incorporate new information and science into planning and implementation of existing and new energy projects.

Neil Thagard—Theodore Roosevelt Conservation Partnership: Transparency is essential to building trust among stakeholders and the general public. Transparency can prevent unnecessary delays, legal actions or bad press. Openness during energy development enables fish and wildlife management that benefits all stakeholders, not just project proponents. TRCP recommends that you: Identify "special places" with exceptional resource concerns or values where energy development should not be allowed. Map these locations and incorporate these values into management plans. Provide up-to-date information through a range of media and informational outlets to the public and fish and wildlife managers regarding energy development projects. Direct and manage leasing and development using complete and up-to-date baseline information on fish and wildlife resources. Utilize coordinated plans for energy development and fish and wildlife management. Provide the public with information about all proposed public-lands energy leases and development; allow sufficient time for public comment. Ensure that all meetings related to public-lands use and energy development are part of the public record.

Neil Thagard—Theodore Roosevelt Conservation Partnership: TRCP values our fish & wildlife resources and encourages you and your staff to establish options that ensure responsible energy development in a way that sustains fish & wildlife. The TRCP's recommendations and priorities regarding management of fish and wildlife during energy development are organized under the five fundamental areas of Funding, Accountability, Coordination, Transparency and Science (FACTS). In 2006, the TRCP released the "FACTS for Fish and Wildlife," specific recommendations for balancing fish and wildlife needs with the development of energy resources. Revised in 2011, the current FACTS document updates those recommendations, expands their applicability to broader geographic regions, and addresses forms of energy development beyond traditional oil and gas. The FACTS revision will allow for fish and wildlife stewardship through better policy and management during energy development. The FACTS recommendations are applicable, with a few exceptions, to land and water, traditional or renewable energy, public or private lands, and infrastructure associated with development. They can increase our ability to responsibly manage fish and wildlife during energy development, balance competing values, become conservation stewards and ensure a future for our fish and wildlife populations. These practices – driven by the FACTS – will sustain and uphold our nation's shared natural resources and unique outdoor legacy.

David Waterstreet—Wyoming DEQ/WQD: Good management and planning decisions to protect water quality, or any other resource, must be based upon scientifically valid and representative data. For example, because groundwater has been contaminated in areas of intensive oil and gas development elsewhere in the state, we believe an important tool to meet the objective of protecting groundwater quality is prioritizing monitoring where intensive oil and gas development coincides with areas most vulnerable to groundwater contamination. The WQD recommends that a science-based surface water and groundwater monitoring program for all large energy development projects be developed in accordance with the BLM/USGS document "Regional Framework for Water Resources Monitoring Related to Energy Exploration and Development." This guidance document provides a collaborative 7-step framework for developing a monitoring strategy for measuring and mitigating water resource damage. We recognize that the BLM has limited resources and personnel to monitor potential effects of their authorized actions, therefore, the RMP must ensure that sufficient resources are made available as part of the approval process for those authorized actions, so that the BLM can make good management decisions that protect water quality and other resources they are entrusted with.

David Waterstreet—Wyoming DEQ/WQD: The substantial existing and predicted energy development within the Rock Springs planning area can impact water quality in a number of ways. Even "green energy" projects, such as wind energy development, have the potential to impact surface water due to the large amounts of surface disturbance associated with developing the infrastructure. The BLM should consider reducing the footprint of surface disturbance as much as possible. For example, many roads associated with energy development have minimal amounts of traffic during the production phase, yet are often built to standards for roads with considerably more traffic. WQD requests the BLM develop and analyze alternatives, which minimize the amount of surface disturbance associated with minimally travelled roads, including minimizing Toad widths and limiting the use of crown and ditch construction techniques. Road ditches often combine water from several ephemeral channels and route them into single channels which do not have the capability to handle the increased flow without eroding. Roads must be designed to cause minimal impacts to surface hydrology. Likewise, the RMP should consider not allowing any surface disturbance of any type on slopes greater than 25%. Regardless of the amount and type of surface disturbance, disturbed areas should be reclaimed as quickly as possible to reduce erosion and water quality impacts. Successful reclamation and reclamation monitoring should be a priority management action in the RMP.

LANDS AND REALTY

Pete Arambel: Land trades and or sales for consolidation or urban interface should be encouraged. The present system takes too long, is too cumbersome and has led to virtually no activity in our district. Adding isolated tracts to larger blocks encourages better open space landscape. Historically significant land should be recognized to have much higher values than other land in regards to trade.

Kent Connelly—Coalition of Local Governments: Existing land withdrawals currently encumbering public lands must be reviewed to determine the need for continuation, modification, revocation, or termination of the withdrawal. 43 U.S.C. §1714(l). Unneeded withdrawals should be revoked and the RMP revision should undertake the mandatory review of such withdrawals. Isolated tracts of public lands located in areas where ownership of surface is dominated by private lands should be classified as available for disposal. All land exchanges must be coordinated with affected permittees, leaseholders, adjacent land owners and local governments. If BLM is to continue its policy of prohibiting the disposal of produced water on public lands, then areas of public land suitable for such activity should be identified as suitable for disposal under the Recreation and Public Purposes Act (RPPA). Currently BLM is forcing such disposal onto private lands, which due to historical settlement patterns, are near municipalities, residential areas or riparian areas. BLM policy places a disproportionate burden on the relatively small percent of private lands within the county. It also increases environmental impacts related to the travel to transport the liquids to the off-site disposal. Alternatives should provide for disposals under the Recreation and Public Purposes Act. Alternatives should be responsive to community and individual needs for access expansion and economic development. Communication site locations should consider the impacts of limitations on possible locations because of the nature of technology and frequencies range of equipment. Designation of preferred sites is acceptable, if not exclusive of other sites. The plan should address the demand for new rights-of-way, possible conflicts, limits or restrictions on future rights-of way. Rights of access to private and state lands should be respected. The important role of the Wyoming Checkerboard in this project area makes access rights especially prominent.

Kent Connelly—Coalition of Local Governments: Surface ownership patterns must be considered when developing management alternatives to ensure the manageability of proposed alternatives and that they do not restrict use and/or development of private or state land. Each map depicting management alternatives should use surface ownership as the base to clearly disclose the potential conflicts and impacts. The Rock Springs Resource Area is bisected by the Wyoming Checkerboard. Because the United States does not own either the surface or the subsurface estate, management must not inversely condemn these lands by either denying access or adopting land management that interferes with the exercise of private land rights. Public land management should not interfere with these established land uses and land rights. Proposed Management Alternatives must recognize and analyze impacts of proposed alternatives on existing rights, such as roads, rights of way, inholdings, leases, permits, etc. To avoid conflicts, the management actions for the Checkerboard area and areas where the public land ownership is the lesser, management stipulations should be developed and displayed for each. Maps should be provided to display these rights and authorized uses.

Nada Culver—The Wilderness Society: Recommendations: The BLM should work with local governments and Tribes when identifying areas where disposal of public lands may be appropriate. However, BLM should identify areas such as ACECs, citizen wilderness proposals, or sensitive species habitat for retention and acquisition. BLM should not dispose of parcels valued by local communities for their open space, wildlife habitat, and recreation opportunities.

John Emmerich—Wyoming Game and Fish: Corridor parameters should be quantified in the RMP for pipeline and electrical transmission projects between Utah and Wyoming in the area south of Rocks Springs between Flaming Gorge Reservoir and Highway 430 in order to maintain integrity and function

of important terrestrial and aquatic wildlife habitats. These parameters should also account for the pipeline and transmission developments already existing in the area at the present time.

John Emmerich—Wyoming Game and Fish: From a wildlife resource perspective, the existing 1-mile north-south utility transportation corridor located on the east side and parallel to Flaming Gorge Reservoir that is identified in the current RMP should be removed from the new RMP. This above and below ground utility transportation corridor has not been used since designated and, therefore, has not generated negative impacts to wildlife habitat. However, this utility corridor is located very close to Flaming Gorge Reservoir, and if used could create negative impacts. An escaped petroleum spill from a pipeline in this designated corridor into the reservoir could compromise a nationally recognized recreation sport fishery. The soil disturbance that could occur in this corridor from numerous expected utility transportation projects may likely promote excessive sediment delivery into the reservoir encouraging eutrophic aquatic conditions and accelerated sediment deposition that buries or degrades important underwater structural habitat features. Moreover, a utility corridor along this designated route would negatively impact sensitive midget faded rattlesnake habitat and migration, run through a designated sage grouse core area, and reduce the function of crucial big game winter range. This utility corridor may also impede vehicle access for anglers, hunters, and other recreationists to the east side of Flaming Gorge Reservoir/NRA during times when individual utility transportation projects are being constructed and operated.

John Hay, III—Rock Springs Grazing Association: The RMP must be careful regarding designation of corridors within the checkerboard, especially along the UPRR and I-80 corridor. Private lands are increasing in value for commercial development even in rural areas miles outside of urban areas. Designation of corridors without full participation of landowners will cause serious problems and conflicts if corridors recommended by BLM interfere with potential commercial uses of private land. Private land owners have no incentive to disclose this information for inclusion in an RMP. It is not the role of BLM to determine potential commercial value. Recommendations for corridors must be flexible. RMP decisions that prohibit location of facilities on BLM lands with intent to force locations and routes across private lands could result in a benefit for the landowner or result in litigation to prevent.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Corridors - As previously mentioned, wherever possible, it is highly desirable to identify and maintain a few large corridors for transmission of energy, materials, and people, rather than multiple corridors that may impact other uses.

Garry Miller—TransWest Express, LLC: In 2010, the Wyoming Infrastructure Authority commissioned a report from ICF International to provide a framework for analyzing minimum separation distances between high capacity lines (the report can be found at http://wyia.org/documents/reports/page/2/). We urge the BLM to consider the findings within this report to ensure its RMP revisions are consistent with the practical application of the NERC and regional reliability standards. As outlined above, the State of Wyoming has developed 1-mile and 2-mile wide transmission corridors through Core Sage-Grouse Management Areas. Our understanding is that these corridor widths were established in part to recognize the minimum separation requirements of the EHV transmission lines (including the TWE Project) being proposed to export Wyoming's energy to markets throughout the region.

Garry Miller—TransWest Express, LLC: In comparing the State of Wyoming's transmission corridors to the Section 368 corridors, the boundaries of the corridors are not coterminous. While in some areas the Section 368 corridors are within the State of Wyoming's transmission corridors, in other instances there is no commonality between the two. We urge the BLM to work with the State of Wyoming to arrive at a common set of transmission corridors through sage-grouse key habitat areas acceptable to BLM, the State of Wyoming, and all other interested stakeholders, including transmission developers. Until such corridors are established, BLM should continue to review and permit transmission lines sited in

designated utility corridors ("windows" under the Green River RMP) established under the current RMP and Section 368 of the EPAct.

Garry Miller—TransWest Express, LLC: Section 368 corridors designated within the Green River RMP include 73-129, 120-221, 121- 220, 121-221, 121-240, 126-218, 129-218, 218-240, 219-229, and 220-221. The Approved Resource Management Plan Amendments/Record of Decision (ROD) for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States (2009) amends the Green River RMP to incorporate the Section 368 corridors identified above. The Rock Springs RMP should designate, at a minimum, the Section 368 corridors as right-of-way corridors in compliance with the ROD for the PEIS, the EPAct, and Section 503 of FLPMA.

Garry Miller—TransWest Express, LLC: The BLM should consider National guidance and policy in the siting and management of transmission lines in its RMP revision. The PEIS states: "Compliance with NERC2 and regional reliability standards is essential to guaranteeing the reliability of the nation's bulk electricity transmission network and nothing in this PEIS… replaces, or relaxes the applicability or enforceability of NERC or WECC3 reliability standards…" Where "corridors are inconsistent with the reliability standards or criteria, those specifications shall be deemed moot, replaced with specifications that are consistent with the applicable standards or criteria." "Although there are various technical means … that can preempt or limit the potential for line failures … by far the most cost-effective preemptive strategy against multiple, simultaneous line loss involves ensuring adequate distance separation between lines at the planning stage." Furthermore, Section 368 of the EPAct directs the Secretary of the Interior (and other agencies) to ensure that additional corridors for electricity transmission on Federal lands are promptly identified and designated as necessary and to expedite applications to construct electricity transmission facilities within the established corridors. This statutory direction should be considered as the RMP revision is prepared.

Garry Miller—TransWest Express, LLC: The Green River RMP designates areas as utility windows, rights-of-way concentration areas, and existing communications sites, which will be preferred locations for future grants. One such window is a ½ mile wide north-side window on the east side of Flaming Gorge Reservoir, roughly paralleling U.S. Highway 191 until a point near Red Creek, at which point the window turns south to the Utah border following the Clay Basin Road. Our information and belief is that this utility window follows an existing pipeline. This window should be designated a general utility corridor with a width of at least 2,000 feet, as there is a need for a corridor in this vicinity. Absent a corridor, there is no connectivity between the Interstate Highway 80 corridor on the north and northeastern Utah on the south.

Garry Miller—TransWest Express, LLC: We also urge the BLM to provide for flexibility in addressing impacts of transmission lines on greater sage-grouse and sagebrush management. Results of studies focused on determining the impacts of electric transmission lines on greater sage-grouse are highly variable and conflicting. Numerous studies indicate that no impacts occur, or can be detected, (Johnson et al. 2010, Douglas et al. 2005, Atamian et al. 2007) while others indicate that transmission lines can adversely impact greater sage-grouse populations or their habitats (Wisdom et al. 2010, Braun et al. 2002, Connelly et al. 2004). It is likely that the different results observed in these investigations are the result of site-specific habitat conditions and population-specific responses to transmission lines and associated environmental correlates. Additionally, the varied results of these studies might be explained by the different types of transmission lines that were evaluated or the level of landscape urbanization in which those transmission lines occurred. Because of the variability in the literature, the RMP revision should provide flexibility to consider site-specific habitat and landscape conditions as well as population-specific characteristics in the siting and permitting, construction, and mitigation phases of a project.

Erik Molvar—Biodiversity Conservation Alliance: Land Ownership Adjustments: (1.) BLM should identify and acquire non-BLM lands and consolidate ownership to enhance its ability to manage important recreation opportunities and wildlife habitats, such as migration corridors, crucial big game habitats, as defined by WGFD, riparian areas, and wetlands. (2.) All land swaps will be conducted with adequate public notice and involvement. (3.) The RMP should determine which lands are currently legally accessible by motor vehicle, horse, or foot for public recreation, and which lands are rendered unavailable for public recreation due to private lands, which hold no access easements. The RMP should address the problem of inaccessibility of public lands for public recreation, including acquisition of easements and appropriate land exchanges.

Erik Molvar—Biodiversity Conservation Alliance: Power lines have a number of unique impacts. In addition to focusing raptor predation on nearby prey populations, Brum et al. (1983) observed that power line ROWs can become access ways for ORV use, serving as a means of gaining access to previously undisturbed areas. Brum et al. also found that effects of disturbance in the Mojave Desert were still apparent 33 years after construction, including depressed mycorrhizal activity, high seedling mortality, and poor shrub recruitment (Ibid.). Under the new plan, utility corridors would follow existing heavy-impact rights-of-way (such as county roads and highways) and be excluded from sensitive areas such as sage grouse Core Areas and the viewsheds of wilderness study areas.

Erik Molvar—Biodiversity Conservation Alliance: ROW Corridors: (1.) Utility corridors should be designated along existing rights-of-way or high-traffic gravel roads or highways. (2.) The following areas shall be classified as “exclusion areas” for the purposes of siting ROW corridors: wildlife crucial winter ranges, crucial winter relief areas, and birthing areas. Other Areas of Critical Environmental Concern as outlined in the Western Heritage Alternative: areas within 1 mile of active raptor nests, areas within 3 miles of active sage grouse or 1 mile of sharp-tailed grouse leks, large prairie dog colonies and complexes, or those inhabited by BLM Sensitive Species such as black-footed ferret, burrowing owl, mountain plover, or swift fox, and critical habitats of Endangered and Threatened species. Lands within the viewsheds of Wilderness Study Areas: (3.) Areas within the 100-year floodplain of permanent or intermittent streams or within 500 feet of natural water sources or riparian vegetation shall be classified as “avoidance areas” for the purposes of sighting ROW corridors. (4.) Communications sites and antenna structures will not be built in or adjacent to: wildlife crucial winter ranges, crucial winter relief areas, and birthing areas, Other Areas of Critical Environmental Concern as outlined in the Western Heritage Alternative, areas within 1 mile of active raptor nests, areas within 3 miles of active sage grouse leks, large prairie dog colonies and complexes, or those inhabited by BLM Sensitive Species, such as black-footed ferret, burrowing owl, mountain plover, or swift fox, and critical habitats of Endangered and Threatened species.

LIVESTOCK GRAZING

Pete Arambel: Continue livestock grazing at present or increased levels where range improvements have led to higher AUM capacity. These capacities should be verified by the use of monitoring and scientific-based analysis. Range improvements that enhance the resource should be authorized in a more streamlined, efficient process (i.e., fences, water wells) Raising food and fiber in a responsible, all natural, renewable manner is integral to our nation's future security. Over regulation has driven the young people away, and the knowledge will be lost. The world is facing a food shortage that will continue to get worse. To remove an environmentally sustainable way of growing food is a travesty.

Kent Connelly—Coalition of Local Governments: Forage allocated to livestock must not be reduced in order to accommodate other resources or uses. Current grazing preference and active use levels must be maintained. BLM must also recognize its obligation to honor the full grazing preference and cooperate with permittees who desire to increase forage and award such increases to the livestock operators. Properly managed livestock grazing is compatible with other uses, such as watersheds, wildlife or recreation. The Wyoming Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management are the standard to which all grazing by wildlife, wild horses, and livestock must be managed. Any report that identifies a failure to meet standards must identify causal factors. BLM cannot reduce grazing unless it can quantify the causal factors and no reduction in livestock grazing can be greater than the proportional share attributed to livestock grazing. If wild horses exceed animal management level (AML) or are grazing outside of an HMA, BLM must take immediate steps to correct the situation due to the otherwise adverse impacts on meeting, maintaining or making substantial progress towards meeting range and health standards. Changes in stocking rates or seasons of use must be based on scientific and verifiable data. All such actions must be made with meaningful consultation, cooperation, and coordination with the permittee. Livestock grazing is, and must be recognized as, a viable tool for habitat and vegetation manipulation and recognized as such throughout the plan. Livestock operators should receive compensatory mitigation for the economic harm relating to loss of livestock, operating capabilities, forage, and access to, or loss of, improvements resulting from development activities or other uses. Management decisions in the densely developed areas should include collaboration with livestock operators and mitigation of impacts. Livestock management must not be subservient to wildlife in development of management actions. Plan development must include participation of range staff in all sections that will affect livestock grazing, including wildlife habitat and vegetation. Plan should provide for BLM facilitation of regular communication between oil and gas operators and permittees and the designation of contact persons for each group.

Shirley DeLambert: We support grazing on BLM lands.

John Emmerich—Wyoming Game and Fish: The needs of seasonal wildlife movements should be considered, promoted, and maintained for all project planning and development or during proposed allotment fencing.

Jason Fearneyhough—Wyoming Department of Agriculture: Livestock Grazing Management: For several decades, RSFO officials and grazing permittees have been working to improve rangeland health through the management of livestock grazing. Range improvements, annual operating instructions, allotment management plans, monitoring, and other livestock grazing tools have moved rangeland health in a positive direction. The EIS chapters on affected environment and environmental consequences must acknowledge these efforts and improvements. Livestock grazing is permitted on 8lM lands, and it is very important the RMP/EIS does not discuss livestock grazing specifically but discusses livestock grazing management instead, just as the section on wildlife deals specifically with wildlife management. Livestock grazing management must meet provisions of grazing permits, allotment management plans, and annual operating instructions. The desired livestock grazing management outcomes are the result of

agreed-upon management practices between RSFO officials and grazing permittees. For these reasons, the RMP/EIS needs to address effects, goals, objectives, and management actions of livestock grazing management, as opposed to the narrow vision of just livestock grazing. Livestock grazing is an important tool used to enhance and sustain rangeland health. Chapter two of the EIS includes the goals, objectives, and management actions of the various resource values. It is essential the goals, objectives, and management actions for livestock grazing management include the promotion of livestock grazing management. This is a contrast to the belief by many that livestock grazing management exists only to promote or mitigate for all other resource values. Chapter Two should be written with the understanding that livestock grazing is an important resource value in, and of, itself and can be utilized as an important tool to achieving desired conditions. The RMP/EIS should not single out the impacts livestock grazing has on other resources, when in all reality numerous resources may be creating identical or similar impacts. All the impacts to a resource should be included without singling out any one specific resource. For example, livestock is often blamed for all browsing occurring on trees and shrubs, while browsing on trees and shrubs also occurs by moose, elk and deer. Do not isolate livestock as the only cause. In contrast, the impacts other resources have on livestock grazing and livestock grazing management are often overlooked. The repercussions of other uses upon livestock grazing, forage availability, and grazing permittees needs to be acknowledged and analyzed. Planning needs to include the effects of each use and resource has upon other uses and resources equally.

Jason Fearneyhough—Wyoming Department of Agriculture: No Grazing Alternative: The RMP should not consider a 'No Grazing Alternative.' An alternative proposing to close the entire planning area to grazing is inconsistent with the Taylor Grazing Act, which directs the BLM to provide for livestock use of BLM lands and to provide for the orderly use, improvement, and development of the rangelands. In addition, FLPMA requires public lands be managed on a "multiple use and sustained yield basis" (FLPMA Sec. 3021a) and Sec. 102(7) and includes livestock grazing as a principal or major use of public lands. The WDA strongly encourages the RSFO official to not analyze any comments or alternatives suggesting the removal of livestock grazing from the planning area.

John Hay, III—Rock Springs Grazing Association: Rangeland monitoring of private lands reflects generally to good condition or better condition, despite extended periods of drought [and] despite decreased numbers of livestock. Excess population and year round grazing by wild horses and increasing numbers of resident elk herds conflict with the ability of the high desert shrub communities to improve or maintain in drought conditions. The RMP will need to reflect that managed livestock grazing is a requirement for proper rangeland conditions, with a need to improve overall, and reflect that the changing world economy, and current agricultural economics, will demand an increase in beef and lamb production from the public rangelands (U.S. Department of Agriculture, and Montana State University, University of Idaho Symposium 2011 Intermountain Range Livestock Symposium). Year round grazing by wild horses is a detriment to rangeland condition and in conflict with established principles of range management.

Jim Hellyer—Hellyer Limited Partnership: Our ranch depends on reliable, predictable, and meaningful access to grass. We do not support the formulation of grazing alternatives that reduce the available forage for cattle. Reductions in amounts, time, duration, etc. all have negative effects on the ranch. It is our position that the BLM has never properly analyzed the negative effects. It is simply the case where the negatives are downplayed in favor of enhanced eco-tourism opportunities or some other nebulous act. We, therefore, suggest, and politely request, that any alternative that works to reduce grazing also analyze a loss of space and a greater chance of a lessor quality outdoor experience as a result of the land use changes from the ranching side. This isn't that complicated of an equation: less ranching = less experience. Most importantly, in a time when the world is demanding more energy, more food, more freedom, it is essential that we do our part and provide these products. The GRRMP covers a large area, and it is unwise to set aside large tracts within this plan as unsuitable for ROWs or development of assorted natures. There may be isolated areas where the BLM has a firm grip on land ownership, but

absent nearly 100% Federal ownership, there are rights that exist and rights yet to be exercised that will affect the Plan. The only way a long-term plan can provide direction for planners is to acknowledge that private rights exist. This acknowledgement will produce a map that is reflective of all of the positives and the negatives. It will not be simply all right-of-way avoidance areas or all Visual Class 2.

Michele and Robert Irwin: Forage/rangeland health: The goal should be to have a healthy native sage steppe with a rich diversity of plant, insect and animal life. Non-native grazers can be utilized as a rangeland tool but need to be heavily managed to ensure no ecological degradation. First priority for available forage should be to native grazers, including those only recently removed from the eco region (bighorn sheep and bison). Since a good portion of lands within the field office boundary are "checkerboard" lands (mostly unfenced, and of big benefit to humans and wildlife), a positive working relationship with the Rock Springs Grazing Association is encouraged. However, while livestock grazing and forage for free-roaming horses provide public benefits (food and tourism), environmental impacts must be mitigated and minimized.

Nathon Maxon—Wyoming Outdoor Council: Some areas in the Rock Springs Field Office may be suffering from degraded or declining rangeland quality. If BLM's grazing standards and guidelines are not met in these Areas, this will dictate that grazing changes be implemented to enhance and protect the ecosystem. It is likely that range-wide sage-grouse declines are partially a result of grazing pressure that has degraded sage-grouse habitat in some areas. Research suggests that poor grazing management, including: degradation of nesting habitat because of reduced of hiding cover, degradation of brood rearing habitat because of species composition changes and loss of preferred forb and insect diversity, and degradation of year-long sagebrush habitat from trampling and the spread of invasive species. (22.) Climate change is another potential stressor on sage-grouse habitat that may exacerbate impacts from grazing and push many areas beyond a threshold where restoration is possible. In general, but especially within sage-grouse core areas, we believe that livestock utilization needs to be carefully managed and some of these areas may need to be freed from grazing pressure to give native grasses adequate growing season rest. We do not believe that a successful effort to restore rangelands should include the widespread use of range "improvements," because absent permitting grazing at levels - compatible with meeting the standards and guidelines - these measures can be ineffective in restoring riparian areas, and in some cases have led to the degradation of previously healthy upland habitats in Wyoming.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Livestock Grazing - Because the area has a mixed ownership of surface, and private lands are essential to wildlife in the area, it is imperative that the BLM recognize and retain preference for grazing in the area on public lands. Maintenance of a strong stewardship ethic will be an asset to a wide variety of resources in the area. Additionally, it would be valuable to focus on development of a Candidate Conservation Agreement for grazing activities within Greater sage-grouse core population areas.

Erik Molvar—Biodiversity Conservation Alliance: Cattle concentrations along streams can significantly increase the bacterial contamination of waterways. In an arid setting, Buckhouse and Gifford (1976) found that fecal coliform in intermittent waterways did not increase due to cattle grazing and that only the feces themselves and an area 1m around them are subject to contamination. The BLM should monitor levels of contamination in heavily grazed areas, particularly near human settlements and important recreation areas.

Erik Molvar—Biodiversity Conservation Alliance: Damage to aquatic systems due to overgrazing often has long-lasting impacts. On the north slope of the Ferris Mountains, Hubert et al. (1985) found that while riparian vegetation recovered rapidly following exclosure construction, brook trout populations were very slow to recover. Thus, in order to maintain healthy fisheries, the BLM must maintain healthy riparian areas.

Erik Molvar—Biodiversity Conservation Alliance: Grazing and Winter Ranges Fall grazing on winter ranges can have beneficial effects on forage quality for mule deer on winter ranges (McLean and Williams 1982). As noted in the Pronghorns section, sheep grazing on pronghorn winter ranges degrades these ranges. Competition between mule deer and cattle on winter range is considerably less when the range is in good condition (Vavra et al. 1982). Dietary overlap between elk and cattle is higher than between mule deer and cattle, but in some cases elk and deer select higher and steeper country (e.g., Berg and Hudson 1982). In the Bighorn Mountains, Long and Irwin (1982) found that both elk and cattle selected similar diets in wet and dry meadows, indicating a high potential for competition for forage. In general, adequate forage should remain after the cessation of livestock grazing to provide ample forage for wildlife on their crucial winter ranges.

Erik Molvar—Biodiversity Conservation Alliance: In arid lands like those of the Red Desert, soils are often thin and of low productivity to start with. According to the Society for Range Management, sustainability for grazing depends mainly on conservation of the soil (Thurow and Taylor 1999). In a study in the Curlew Valley on the Idaho-Utah border, James and Jurinak (1978) found that soil nitrogen limits plant growth in Great Basin shrub-steppe ecosystems. Livestock grazing is the land use that potentially has the most widespread effects on soils. According to Miller et al. (1994), "Long term heavy grazing can gradually deplete soil nutrients. The greatest loss of nutrients may result from alteration of plant community structure which influences overland flow, erosion, infiltration rates, and nutrient turnover rates." Thus, to protect the soil, overgrazing must be prevented. It is imperative that land management practices in the planning area protect soil productivity in order to ensure the productivity of the ecosystems that the soils support.

Erik Molvar—Biodiversity Conservation Alliance: In their review of literature, Hart et al (1993a) concluded, "Stocking rates have much greater potential than grazing systems for altering frequency and intensity of defoliation and subsequent changes in botanical composition of range plant communities" (p. 122). Bartolome (1993) echoed this conclusion, stating that although compensatory growth had been shown on high productivity, intensively managed sites, it had not been shown for semi-arid rangelands. Hart et al. (1993b) asserted that creating smaller pastures through fencing and creating additional water sources could more evenly distribute the effects of livestock across a given area. But this outcome may also have disadvantages. Mattise et al. (1982) found that the more even cropping of vegetation in a rest-rotation system produced inferior sharp-tailed grouse nesting habitat to season-long grazing. Thus, it appears that grazing systems offer no particular ecological advantages.

Erik Molvar—Biodiversity Conservation Alliance: Livestock Grazing Management: Overall, the BLM should manage allotments to avoid overgrazing and render livestock grazing compatible with other multiple-use values. (1.) The RMP should include a reasoned determination as to which lands within the Resource Area should be grazed. The special values of lands in ACECs or other special management areas, lands that warrant the protection of NSO stipulations, lands with concentrations of biological soil crusts, or lands with plant or animal species of concern may dictate a determination that such lands are unsuitable for livestock grazing. (2.) The RMP should include a three-year schedule for reviewing the condition of all allotments and riparian areas and swift rehabilitation of those that are not in compliance with these requirements. The RMP should adopt a similar schedule for ensuring the timely completion of evaluations required under the National Environmental Policy Act and the Endangered Species Act for grazing activities on the Resource Area. (3.) The BLM should manage all allotments toward "good" to "excellent" range condition. (4.) Sufficient forage should remain following livestock grazing to support native wildlife. (5.) The new RMP should impose measures to minimize the transmission of diseases from livestock to native wildlife and separate domestic sheep from bighorn sheep populations. (6.) All fences shall meet WGFD standards with regard to construction standards. (7.) Illegal fences should be brought into compliance or removed. (8.) The construction of new fences that might potentially interfere with the migration or dispersal of wildlife should be avoided. (9.) The "Standards and Guidelines for General

Application to All Components of the Rangeland Ecosystem," as well as "Standards and Guidelines for Unhealthy Ecosystems," currently in force on BLM lands, shall be formally adopted in full into the new RMP. (10.) The BLM must ensure that grazing complies with the Fundamentals of Rangeland Health and other statewide requirements, and all riparian areas must be managed to comply with current "Properly Functioning Condition" requirements.

Erik Molvar—Biodiversity Conservation Alliance: Sagebrush "control" projects that target "decadent" sagebrush, which is the obligate habitat of the rare pygmy rabbit, a BLM Sensitive Species, must be avoided.

Erik Molvar—Biodiversity Conservation Alliance: Siekert et al. (1985) found that summer and fall grazing in Wyoming's Bighorn Basin had the effect of making intermittent stream channels wider and shallower, but spring grazing did not cause stream channel degradation. But Marlow and Pogacnik (1985) found that stream bank damage was greater when soils were saturated, and cautioned that spring grazing should be deferred until riparian soils had dried. Because there is no uniform trend, seasonal timing of grazing should be examined on a case-by-case basis.

Erik Molvar—Biodiversity Conservation Alliance: Springs and Water Developments: Lange (1969) introduced the concept of a piosphere, or area of heavy grazing that typically develops around a water source. This heavy grazing degrades habitats for native species around water sources. For this reason, the management of springs and other water sources, so important in desert environments, is crucially important. Several researchers have made concrete recommendations regarding the management of springs and water sources. A study of small mammals in the Great Divide Basin found that montane voles are restricted to spring areas and water drainages with taller, denser vegetation (Maxell 1973). Thus, the current strategy of fencing off the springs themselves from livestock and providing for livestock watering outside the fence is an ecologically sound strategy. Furthermore, Connelly et al. (2000) recommended against developing springs for livestock water, which serves to dry out riparian and wet meadow habitats that are key to successful sage grouse brood rearing, and pointed out the need to modify existing water developments to restore natural free-flowing water and wet meadows. Miller (1983b) recommended against constructing new water sources near ridges in the Red Desert, because doing so could heighten competition between domestic cattle, wild horses, and pronghorns.

Erik Molvar—Biodiversity Conservation Alliance: The BLM should provide baseline data on biological soil crusts and their distribution across the planning area and develop specific standards tailored to maintaining existing biological soil crust and promoting its expansion in areas where it has been impacted.

Erik Molvar—Biodiversity Conservation Alliance: The BLM's grazing policies and practices should discourage the concentration of cattle in the riparian zone. Under the new RMP, standards should be put in place to protect healthy woody vegetation in riparian areas and to restore it in areas that have become degraded. Riparian areas should be the focus of monitoring efforts, as these areas can become ecologically impaired before upland habitats begin to show signs of damage.

Erik Molvar—Biodiversity Conservation Alliance: The negative impacts of overgrazing on desert ecosystems are well-known, and overgrazing must be prevented in order to retain productivity of vegetation communities and wildlife.

Erik Molvar—Biodiversity Conservation Alliance: Thus, the BLM should not rely on the placement of salt blocks as a means to draw livestock away from riparian habitats. A change in grazing regime may also lead to the restoration of Properly Functioning Condition in some cases. Bryant (1985) found that while rest from grazing showed the greatest increase in riparian vegetation, short-duration grazing elicited

a threefold increase in vegetation in riparian areas. Productivity was enhanced when no more than 70% of the forage was removed annually (Ibid.). For optimal riparian zone recovery, Case and Kaufman (1997) recommended complete protection from grazing for the first 5-10 years following livestock removal.

Erik Molvar—Biodiversity Conservation Alliance: To allow for optimal revegetation, Benson et al. (1991) recommended curtailing grazing for 2-3 years following fire. This recommendation should be heeded in the planning for all prescribed fire projects and should become a standard in the new plan.

Erik Molvar—Biodiversity Conservation Alliance: Various grazing systems have been advanced as panaceas for ecological damage due to grazing. Bock et al. (1993b) noted that rotational or uniform grazing pressure leads to uniform habitat types rather than a mosaic of successional stages, a result of the slow recovery of ecological succession compared to the typically rapid frequency of grazing rotation. But while optimization for livestock weight gain may maximize livestock production while maintaining net primary productivity, it may also shift the community away from late-successional dominants (which have high value as forage) to mid- to early successional annuals, including introduced weed species (Briske 1993). Thus, there appear to be no "silver bullets" for grazing impacts that avoid the need to make tough choices between livestock output and ecological health.

Erik Molvar—Biodiversity Conservation Alliance: We urge the BLM to develop clear and practical standards and guidelines under its new RMP to achieve the goals set forth in the Wyoming Standards for Healthy Rangelands and apply these standards not only to grazing but to all other activities permitted by the Rock Springs Field Office.

Erik Molvar—Biodiversity Conservation Alliance: We urge the BLM to manage for long-term sustainability rather than short-term profitability, because long-term management renders livestock grazing more compatible with ecosystems and wildlife.

Erik Molvar—Biodiversity Conservation Alliance: We urge the BLM to manage range resources to improve range conditions into the "good" to "excellent" categories. Bock et al. (1993a) recommended that 20% of each grazing allotment be set aside as a reserve, to provide baseline data to monitor the effects of grazing and preserve biodiversity. We do not recommend anything so ambitious. But small exclosures should be erected in representative habitat types of each allotment to serve as a baseline for measuring for monitoring departure from ungrazed condition as a result of the cumulative effects of wildlife and livestock grazing. The BLM's Rangeland Reform program presents a set of "Standards and Guidelines for General Application to All Components of the Rangeland Ecosystem," as well as "Standards and Guidelines for Unhealthy Ecosystems," detailing Properly Functioning Condition measures (BLM 1993). On the national level, the Rangeland Reform measures are vulnerable to weakening to achieve the political goals of the current administration. We support the Rangeland Reform measures as a solid baseline upon which to organize the Great Divide grazing program and feel that these provisions are a minimum that should be pursued in southeast and south central Wyoming. Thus, we ask the BLM to formally adopt these measures as Standards and Guidelines in the revised plan, regardless of whether they duplicate existing federal mandates at the time.

Suzy Noecker—Wyoming Farm Bureau Federation: Our concerns include, but are not limited to, the following: (1.) Increasing livestock grazing by utilizing tools such as stock ponds, fences, mineral and salt licks, etc. (2.) Enhancing sagebrush management strategies, taking advantage of new research and cooperative activities taking place in Wyoming regarding the management of habitat for sage grouse. (3.) Consideration of the cumulative economic/environmental impacts of management policies affecting the economic viability of livestock grazing. (4.) Employing best management practices to increase livestock grazing opportunities by improving forage quantity and quality. (5.) Maintaining innovative, flexible management plans with permittees to reach desired rangeland conditions.

Suzy Noecker—Wyoming Farm Bureau Federation: WyFB would like to see the lands and other resources administered by the BLM in the Rock Springs Field Office continue to be managed for multiple uses. While our concern lies primarily with the continuation of permitted grazing use, we understand the importance to Wyoming's economy of energy exploration and transmission, recreation, wildlife habitat, etc. However, because it is such a strong management tool in ensuring rangeland health, we do not feel it is appropriate to reduce grazing opportunities to satisfy other uses.

MINERALS: FLUID

Pete Arambel: Energy and mineral development should continue. Base line resource data must be collected prior to allowing any new development (water, vegetation, wildlife). Transmission lines for these products must be permitted to allow the Wyoming residents' tax based income.

Aaron Bannon—National Outdoor Leadership School: Designate Appropriate Areas for Reduced Well Density: Where the BLM decides that NSO stipulations are unreasonable, consider imposing stipulations that require reduced well densities in sensitive areas and highlighted viewsheds. Using directional drilling, exploration companies can access a wider area with a smaller footprint, reducing the negative impacts on other users of the resource.

Aaron Bannon—National Outdoor Leadership School: Expand NSO Stipulations: Directional drilling technologies are constantly improving, allowing exploration companies to drill further and deeper from the same well pad than in years past. In areas within the Jack Morrow Hills viewshed, consider expanding NSO stipulations to limit the impact of development, while still allowing resource extraction. Such stipulations are especially applicable around the outer boundary of the Jack Morrow Hills and around the buffer zones already established near WSAs.

Aaron Bannon—National Outdoor Leadership School: VII. Fluid Minerals Management: There is plenty of room in the 3.6 million acres of public lands administered by the Rock Springs BLM to strike the appropriate balance between the multiple uses it is required to manage. NOLS believes that backcountry recreation and oil and gas development can co-exist. To that end, we encourage the BLM to draft a plan that prohibits large-scale mining and oil and gas development within the 622,000 acres that constitute the Jack Morrow Hills, while allowing for other multiple-use activities. In order to strike this balance, the BLM should impose stipulations on development that will reduce the impacts to the numerous other incompatible uses of the land.

Randy Bolles—Devon Energy Production Company, L.P.: As the BLM considers revisions to the Rock Springs RMP, Devon encourages the agency to avoid actions that could impair oil and gas development and could subsequently harm local economies. The BLM should also carefully review the results and analysis contained in the Scientific Inventory of Onshore Federal Land's Oil and Gas Resources and the Extent and Nature of Restrictions or Impediments to Their Development (2006). (EPCA prepared in compliance with § 604 of the Energy Act of 2000, Pub. L. No. 106-469, and § 364 of the Energy Policy Act of 2005 and the Inventory of Onshore Federal Oil and Natural Gas Resource Restrictions on Development [EPCA ill]). Specifically, the EPCA ill study demonstrates that the Rock Springs Resource Area contains significant oil and gas potential. The study indicates that the Greater Green River area contains two billion barrels of oil and 68 billion cubic feet of natural gas. Given this significant potential, the BLM should not overly restrict oil and gas development.

Randy Bolles—Devon Energy Production Company, L.P.: In May of 2010, Secretary Salazar issued Instruction Memorandum 2010-117, which substantially revised the plan where the BLM made lands available for oil and gas leasing. A particularly important and noteworthy facet of the Secretary's Order was the requirement of the BLM to prepare master leasing plans under specific circumstances. The BLM has only recently publically announced the areas for which it will prepare master leasing plans in Wyoming. As the BLM is aware, the Greater Little Mountain Area was included as an area for which the BLM will prepare a master leasing plan, despite the fact the area does not meet the criteria identified in Instruction Memorandum 2010-117. Rather, the BLM has elected to consider a master leasing plan for this area using its discretionary authority. See Wyoming Master Leasing Plan Assessment, pg. 41. Devon objects to the BLM's decision and believes the BLM should strongly consider not preparing a master leasing plan for this area; given the fact large portions are already leased, several units have been

approved by the BLM, and the oil and gas potential is largely unknown. The BLM should adhere to its own policy and not prepare a master leasing plan for this area. At the very least, the BLM should modify the boundary of the master leasing plan to exclude existing federal units and should eliminate the eastern and northern portion of the proposed master leasing plan, given the significant private lands and minerals in the northern area and the fact that there not as many competing resource values in the eastern section. Finally, Devon owns substantial oil and gas leases within the Greater Little Mountain area and is the BLM-approved operator of two approved federal oil and gas units. The BLM should not take any action that would impair or materially impact Devon's leases in this area and should, instead, ensure its existing, valid lease rights.

Randy Bolles—Devon Energy Production Company, L.P.: In the revised Rock Springs RMP and accompanying environmental impact statement ("EIS"), the BLM should state clearly that an oil and gas lease is a contract between the federal government and the lessee, and that the lessee has certain rights thereunder. Although the BLM may revise the existing RMP for the Rock Springs Field Office, the BLM - and the public - should be reminded that the BLM cannot unilaterally alter or modify the terms of existing leases. The BLM recently recognized the nature of existing oil and gas lease rights in the Pinedale RMP issued by the BLM in November of 2000. "Existing oil and gas or other mineral lease rights will be honored. When an oil and gas lease is issued, it constitutes a valid existing right; BLM cannot unilaterally change the terms and conditions of the lease ... Surface use and timing restrictions from this RMP cannot be applied to existing leases." Pinedale RMP, 2-19. Similar language exists in the December 2008 Rawlins RMP. Rawlins RMP, pg. 20. Devon encourages the Rock Springs BLM to include similar language in its RMP.

Randy Bolles—Devon Energy Production Company, L.P.: The BLM must ensure that oil and gas development is not unreasonably limited in the revision to the Rock Springs RMP.

Randy Bolles—Devon Energy Production Company, L.P.: The BLM should explain to the public during scoping meetings and in the EIS for the revised Rock Springs RMP that oil and gas development activities are not prohibited during the resource management plan process. The position that the BLM must suspend all management decisions while an RMP is being revised has been rejected by numerous federal courts and the IBLA. The BLM should not limit or restrict oil and gas development during the amendment process. This is particularly important in the Rock Springs Field Office where several oil and gas projects are ongoing.

Randy Bolles—Devon Energy Production Company, L.P.: When developing the RFD Scenario, the BLM must carefully explain to the public that the RFD Scenario is not a cap or limitation on future development. In the most recent published decision from the IBLA regarding the RFD Scenario, the IBLA unequivocally determined that the RFD Scenario is not, and cannot be used as, a limitation on future oil and gas development. "While an important tool in the land use planning process, RFD scenarios do not constitute fixed or maximum limits on development under FLPMA such that exceeding them constitutes a violation of that statute." Biodiversity Conservation Alliance, et al., 174 IBLA 1, 11 (2008). In order to prevent future litigation and appeals, the BLM must include language in the Record of Decision and the Rock Springs RMP describing the purpose of the RFD Scenario and the fact that the RFD Scenario is not a planning decision or limitation on future oil and gas development. Instruction Memorandum 2004-089, Policy for Reasonably Foreseeable Development (RFD) Scenario for Oil and Gas (Jan. 16,2004).

Randy Bolles—Devon Energy Production Company, L.P.: When revising the Rock Springs RMP, the BLM should ensure that stipulations developed for future oil and gas leasing are the least restrictive necessary to adequately protect other resource values.

Randy Bolles—Devon Energy Production Company, L.P.: When revising the Rock Springs RMP, the BLM must also acknowledge existing rights, including oil and gas lease rights. Once the BLM has issued a federal oil and gas lease without "no surface occupancy" stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold.

Steven Brutger—Trout Unlimited: The Minerals Management section of the 1997 Green River Resource Management Plan is outdated and in need of revision. A new oil and gas leasing decision should be part of the RSRMP revision. TU specifically recommends the following planning criteria to be included in the RMP: The new oil and gas leasing decision should make a determination whether specific lands are open or closed to leasing and if specific lands are open to leasing, what leasing stipulations will apply. While these decisions should account for valid existing lease rights, decisions made regarding availability for oil and gas leasing and stipulations should be new decisions and not amendments to the old Oil and Gas Leasing Decision. New Administrative leasing policy has significantly changed to where a new oil and gas leasing decision for this resource area should be undertaken. TU requests the BLM to implement the new oil and gas leasing reforms, as identified in the May 2010 (IM) 2010-117, as they move forward with a new Oil and Gas Leasing Decision. Clarification should be made regarding various constraints applied for new leases and whether they would also apply to areas currently under lease. While TU understands the current rule of leasing stipulations and the potential for changing these stipulations, the (IM) 2010-117 allows for field offices to evaluate whether oil and gas management decisions and associated protection measures are adequate. If the lease stipulations do not provide adequate resource protection, the IM provides the tool to develop new lease stipulations or revise existing ones (IM 2010-117; II.C.2. Plan Conformance and Adequacy). Further, even without the use of the new IM, there are methods that would allow the application of new stipulations that are developed as part of a new leasing decision under reasonable conditions of approval. The applicable regulation (43 C.F.R. § 3101.1-2) subjects lessees' surface use rights to "such reasonable measures as may be required by the authorized officer to minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed." In Yates, a recent Interior Board of Land Appeals case, the breadth of BLM's discretion is illustrated to impose additional measures as conditions of approval "as long as they constitute a reasonable measure to minimize adverse impacts under 43 C.F.R. § 3101.1-2." 176 IBLA 144, 156 (Sept. 30, 2008). Therefore, TU feels that constraints in the form of stipulations that are developed as part of a new leasing decision should apply to all new leases considered for sale in the RSFO. The RMP, as part of a new leasing decision, should also make it clear that the same constraints applied to new leases, will be applied to existing leases in the form of conditions of approval unless the authorized officer determines that such a constraint would not be "reasonable" under 43 C.F.R. § 3101.1-2. In doing so, we would also recommend that in the course of determining stipulations for each lease, the circumstances for granting exceptions, waivers, or modifications should also be determined, including the required documentation, public notifications, and other pertinent information. Any lease waiver, exemption, or modification should be subject to an environmental assessment and public comment.

Kent Connelly—Coalition of Local Governments: The plan must fully disclose and implement the provisions of the Energy Policy Conservation Act, H-1624-1, Planning For Fluid Mineral Resources and National Energy Policy as they pertain to planning and mineral management. Reasonable Foreseeable Development (RFD) projections must be developed in compliance with Instruction Memorandum No. 2004-098. Additionally, this IM provides that a baseline RFD (well numbers and number of acres) be developed based on mineral potential and development of said area under standard lease stipulations. Reductions in RFD from Alternative to Alternative must be clearly displayed in order to disclose impacts to Oil & Gas and must be reported in impact analysis. The Mineral Potential Report must address the occurrence of rare earth minerals and disclose their potential for development if they are found to exist. No Surface Occupancy should be tailored to specific sites, based on slope, soils, or ESA habitat. Drilling

rights on future leases may be limited but only if the area can be technically and economically accessed by directional or horizontal drilling and without harm to private and State landowner property and development rights. Such designations must not prevent the protection of any mineral estate from drainage. If Alternatives propose to require the use of directional or horizontal wells, analysis must disclose the feasibility of drilling, and the impacts must be disclosed. Unless prohibited by law or regulation, all areas should be open to geophysical operations. Such activity is of short duration and low impact; data collected can be helpful in making sound management decisions. Restrictions placed over areas with existing oil and gas leases must be consistent with existing lease stipulations and the RMP must disclose the lack of legal authority to retrofit the existing leases with new stipulations. The plan should clearly describe compensatory (off site) mitigation. This should be accomplished by providing a brief description in Chapter 2 that refers the reader to the Appendix where IM No. 2008-204 is displayed. This will prevent future misapplication and implementation of off-site mitigation. Areas to be closed to mineral leasing for the life of the plan must be withdrawn in accordance with FLPMA, 43 U.S.C. 1714(c). See Mountain States Legal Foundation v. Andrus, 499 F. Supp. 383, 392-93 (D. Wyo. 1980) (BLM could not decline to issue leases in National Forest wilderness study areas without complying with §204 of FLPMA); Mountain States Legal Foundation v. Hodel, 668 F. Supp. 1466, 1474 (D. Wyo. 1987) (Forest Service violated FLPMA when it imposed an oil and gas leasing moratorium pending completion of its land use plan). Congress has also expressed the view that FLPMA withdrawals apply to mineral leasing when it directed Interior Secretaries to issue withdrawal orders. Pacific Legal Foundation v. Watt, 529 F. Supp. 982, 985-986 (D. Mont. 1982) (committee directed Secretary to withdraw National Forest wilderness from mineral leasing); National Wildlife Federation v. Clark, 577 F. Supp. 825, 829 (D.D.C. 1984) (committee directed Secretary to withdraw Fort Belknap from coal leasing). Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development (Gold Book) should guide all oil- and gas-related development activity with respect to roads and surface disturbance.

Joshua W.D. Coursey—Greater Little Mountain Coalition: (9.) A review of cumulative impacts in the GLMA from wind development rights of way, mineral leases, and pipeline proposals should take place before further leasing and permitting continues to best protect traditional land uses.

Nada Culver—The Wilderness Society: Master Leasing and Development Plans (MLPs) are a key component of BLM's new oil and gas leasing reforms. They are designed to help BLM identify, evaluate and resolve oil- and gas-related resource conflicts across broad geographic landscapes. If developed and implemented properly, MLPs will create greater certainty for industry, because through the MLP process, BLM will have theoretically identified and addressed all potential resource conflicts prior to issuing leases and authorizing development. This will result in fewer protests and litigation from the public, while also ensuring that measures are in place to protect wildlife, wilderness values and other important resources on the public lands. As BLM's Director stated in IM 2010-117, "there is no presumed preference for oil and gas development over other uses." Thus, it is imperative that BLM carry out this directive by developing and evaluating MLPs for landscapes within the Rock Springs Field Office where potential resource conflicts exist with oil and gas leasing and development. Thus, while we support BLM's decision to prepare "discretionary" MLPs for six areas in Wyoming, including for Greater Little Mountain in the Rock Springs Field Office, we feel strongly that BLM should reconsider its decision concerning the public's MLP nominations, including and especially the nominations for Greater Adobe Town and Jack Morrow Hills. Following this reconsideration, which should show that both of these areas satisfy the MLP criteria, BLM should include MLP alternatives for Greater Adobe Town and Jack Morrow Hills in the Draft RMP. In the event BLM does not do this, BLM should nevertheless address the potential resource conflicts identified in the nominations by proposing a series of special designations in the Draft RMP, including Wild Lands, ACECs and SRMAs, with appropriate restrictions on oil and gas leasing and development.

Nada Culver—The Wilderness Society: Recommendations: As an alternative to preparing an MLP, BLM should develop and propose a range of special designations, including Wild Lands, ACECs and SRMAs, to protect important resources and landscapes within Greater Adobe Town from the cumulative impacts of oil and gas development. Under one or more of the alternatives, BLM should consider closing some or all of these proposed designations to oil and gas leasing. BLM should also include additional management prescriptions drawn from IM 2010-117's list of recommended "planning decisions," including phased leasing and development, caps on new surface disturbance pending acceptable reclamation and best management practices, such as drilling multiple wells on a single pad. Consistent with valid existing rights, planning decisions that pertain to the development of existing leases within these areas should be proposed as conditions of approval, as recommended by IM 2010-117.

Nada Culver—The Wilderness Society: Recommendations: Because Greater Adobe Town satisfies the IM's criteria, BLM should develop and include a range of MLP alternatives for this area in the Draft RMP. As directed by IM 2010-117, those alternatives should contain a suite of measures to avoid or mitigate conflicts between oil and gas development and Greater Adobe Town's important natural, cultural and paleontological resources. As recommended in the nomination, at least one of those alternatives should close citizens' proposed wilderness and sage-grouse core areas to oil and gas leasing, including areas covered by existing leases that will expire within the next five years.

Nada Culver—The Wilderness Society: Recommendations: BLM must prepare an MLP analysis for Greater Little Mountain in the Draft RMP. This analysis should clearly identify for the public the potential resource conflicts present within Greater Little Mountain and include a range of alternatives, drawn from the recommendations within the public's MLP nominations and IM 2010-117, to resolve those conflicts. Finally, BLM must evaluate the direct, indirect and cumulative impacts of the proposed MLP alternatives on wildlife, wilderness values and other important resources within Greater Little Mountain, including landscape-level resources.

Nada Culver—The Wilderness Society: Recommendations: BLM should develop and include at least one MLP alternative in the Draft RMP. This alternative (or set of alternatives) should, at a minimum, evaluate closing areas that contain recently expired leases or set-to-expire leases to future leasing, in order to protect wildlife, wilderness values and other important resources in Jack Morrow Hills.

Nada Culver—The Wilderness Society: Recommendations: IM 2010-117 provides the Rock Springs Field Office with the discretion to prepare an MLP for Greater Adobe Town. Because of the significant resource conflicts identified in Greater Adobe Town's MLP nomination, and in light of BLM Colorado's decision to prepare an MLP for Greater Adobe Town, Rock Springs should exercise its discretionary authority under the IM and include MLP alternatives for this area in the Draft RMP. Moreover, the Rock Springs Field Office should coordinate this effort with the Little Snake Field Office, much in the same way that field offices in Colorado and Utah are collaborating on cross-border MLPs.

Nada Culver—The Wilderness Society: Recommendations: In order for the BLM to comply with FLPMA and NEPA, the agency should, at a minimum, consider and "rigorously explore" the possibility and design alternatives, which do not leave a significant portion of the Field Office open to oil and gas leasing. See 43 U.S.C. § 1712(c)(1) and 40 C.F.R. §§ 1502.14(a) and 1508.25(c). We recommend, at a minimum, that the areas identified as having "low" oil and gas potential be removed from consideration for leasing. Further, BLM must consider a range of alternatives that will address what to do with currently leased lands, which are not developed and are either terminated or expire. Not allowing oil and gas leasing in these areas would help the BLM move towards meeting its goal of managing the federal lands within its jurisdiction for a variety of uses, not primarily for oil and gas leasing. For lands that are identified as appropriate for leasing, a variety of non-waivable stipulations, conditions of approvals (COAs), and Best Management Practices (BMPs – discussed later) should be developed to protect the

many resources present in the planning area. Protecting sage grouse from oil and gas development is of utmost concern in this planning area.

Nada Culver—The Wilderness Society: Recommendations: The RMP must identify BMPs and make them mandatory, especially in sensitive areas. BMPs should include: Phased or strategic development - in terms of timing (developing one area, then restoring before moving to another), location (such as staying out of big game corridors), limiting amount of equipment in use at any given time, and limiting amount of surface disturbance on a lease at any given time and requiring successful restoration before permitting additional disturbance; directional drilling; clustered drilling; closed loop drilling; interim reclamation; restoration standards; unitization; and increased bonding that will fund reclamation.

Shirley DeLambert: We support oil and gas production on BLM lands.

Nick Dobric: Energy development should be required to follow policies that limit wildlife disturbance during critical times of the year and migration areas and be required to use the best available technology such as directional drilling. The BLM should also require a "reclamation deposit" to ensure that the land is reclaimed without taxpayer money once the lease expired.

Callie Domek: Please do everything in your power to protect the beautiful and valuable Red Desert to the utmost level from all development and leases, including mining, roads, and drilling. The long-term negative and destructive impacts of development in the Red Desert heavily outweigh any of the possible short-term benefits. You must do everything in your power to protect this place, our shared home, far into the future with the decisions made now.

Rita Donham: If there are gas reserves, let them stay below until there's a smarter, cleaner and safer way to extract the gas. The current practice of fracking is being disputed as a source for aquifer contamination. The industry produces too much in the way of VOC's and NOX's into the air.

Rita Donham: Please do not sell leases to Minerals Companies on the Red Desert, especially in the Killpecker Dunes, Jack Morrow Hills, and near any migratory corridor or winter habitat for Mule Deer, Elk, and Pronghorn. The Oregon Buttes, where the springs are -- above Hay Reservoir and on the Hay Cattle allotment -- should be absolutely off limits to the drilling industry. These Buttes are remarkably beautiful and offer water and feed to wildlife and livestock both.

Rita Donham: Sublette County has rapidly developed the Natural Gas fields in that area and the wildlife is suffering terribly. The Mule Deer herd is 1/3 of what it was since Winter Drilling commenced on the Mesa 4-5 years ago. These migrating herds need a place to winter over -- the Red Desert is like the Serengeti of WY. Winter Drilling has a very negative impact on the wildlife and the people. The Pollution combined w/snow and UVs has created a serious ozone problem South of Pinedale. If Gas field development continues in WY at such a pace, we will soon have the worst air in the country -- we used to have the best air -- 10 years ago.

Patricia Dowd: For the past 17 years, I've watched the Red Desert change from a place of solitude to one where new roads are being punched in, oil and gas exploration and drilling is occurring and wildlife habitat is being negatively impacted. However, the BLM has an opportunity during the Rock Springs RMP to protect the natural, historic and tribal resources that are still present in southwest Wyoming. When drafting the RMP, I encourage the BLM to manage for the conservation and improvement of the Red Desert's wildlife, natural, historic and tribal resources.

John Emmerich—Wyoming Game and Fish: We support the use of seasonal wildlife stipulations to help offset impacts from industrial development. We recommend the RSFO adhere to the Department's current recommendations regarding oil and gas, wind energy, and other types of development.

Jason Fearneyhough—Wyoming Department of Agriculture: Energy Development: With the rapid increase of mineral and energy development occurring in the RSFO planning area, it is necessary to address the effects energy development activities have on natural resources and other resource uses. The WDA supports on-site and off-site mitigation for livestock grazing activities to lessen the burden, livestock stress, and economic impacts to grazing permittees. The RMP should address both on- and off-site mitigation. In addition, timely and successful reclamation following development is imperative. The revised RSFO RMP needs to address reclamation thoroughly in order to restore livestock and wildlife habitat.

Josef Greig: Steamboat, Adobe Town, and all those historical areas, and areas of high game concentration must be saved from mineral and oil development. But the areas around them must also be preserved as buffer zones--like the greater Yellowstone areas.

Jim Hissong—Upper Bear River Trout Unlimited: Ensure that developments with the Little Mountain area are done with the least amount of impact.

Jim Hissong—Upper Bear River Trout Unlimited: No wells or development in Trout Creek drainage. Water use for gas wells must be kept to a minimum. Encourage Devon Corp. to work closely with Trout Unlimited and conservationists to remove culvert barrier at Trout Creek/Sage Creek junction and remove barrier dams on Gooseberry. Please make this multi-land use project a premier example of "how development should be done" to make the least impact on the land.

Jim Hissong—Upper Bear River Trout Unlimited: Please do not develop oil and gas wells within the Trout Creek drainage.

Michele and Robert Irwin: Extractive uses. Already this region is becoming over industrialized, resulting in habitat fragmentation, as well as issues of air quality and water use. The BLM should be encouraged to enable and enforce win-win solutions that can actually result in environmental enhancements. Extractive resources certainly provide benefits, but their negative impacts must be mitigated and minimized. There should be no drilling in areas of crucial environmental concern, including wilderness study areas and critical wildlife habitats.

Darlene Jones: The greatest destructive forces I see to the wild areas around Rock Springs are gas/oil exploration and drilling, mining, and commercial development. All of these things have lasting impacts. The thing that bothers me the most about oil/gas leases is the time periods. I would like to see the time periods shortened on new leases to 2-5 years. That is plenty of time to get in, rape the land, and get out, including reclamation. What I do not want to see is long-term leases just for the sake of oil/gas company(s) convenience. This allows them to tie up the land indefinitely until the price of world oil goes up to the windfall profit range. I say, if they drill a well or series of wells, and they are continuous producers, then lease extensions should be available with a % royalty going to the BLM. If the well(s) is not a winner, shut it down and terminate the lease. Mining interests should also be under limited time frame leases.

Brian L. Kelly: This current RMP does not address the possibility of oil shale development and carbon sequestration. Carbons sequestration is taking place now; the University of Wyoming is drilling the first test well by Jim Bridger Power Plant with a full-scale pilot plan implemented. It's here, it's now and it's not addressed in this RMP.

Laura Koval—Fidelity Exploration and Production Company: BLM should clearly identify potential technical and environmental areas of concern related to oil and gas development and the basis for those concerns in the RMP. BLM should discuss the need for monitoring and mitigation of these areas of concern. BLM should be able to allow operators the flexibility to propose monitoring and mitigation methods and/or approaches appropriate for each specific oil and gas project. The BLM should be able to evaluate each proposal on its own merits. Regional and area-wide requirements and stipulations should be kept to a minimum and be clearly applicable to the individual project. The Planning Criteria identified for the planning process indicates valid existing lease rights will be honored in the amended plan. Nevertheless, BLM needs to specify in the planning documents if and how valid existing lease rights could be impacted by the new leasing or management decisions. Specifically, potential conditions of approval for operations and other changes should be identified. The concept of offsite mitigation was developed by the petroleum industry to ameliorate potential impacts associated with specific development projects located in highly sensitive areas or areas of dense development where existing stipulations created a roadblock to completing a project in an efficient and cost effective manner. Historically, it was the DOI Solicitor's Opinion that BLM could not accept offers of offsite mitigation. However, a change in interpretation of the law now allows BLM to capitalize on industry's enthusiasm to work with the agency to ensure important energy projects can move forward. Consequently, despite industry's willingness to implement offsite mitigation when deemed necessary, BLM has chosen to make offsite mitigation a requirement whenever the agency deems it is "necessary." Of greatest concern to Fidelity is that the IM fails to adequately recognize that lessees have valid existing rights as determined by lease stipulations and fails to explain how these rights will be honored when making decisions regarding where offsite mitigation must be applied. We urge BLM to use off-site mitigation only in areas where no other options exist. There should be recognition and disclosure in the RMP that changes in oil and gas technology will allow development and operations to take place with less disturbance and impact than might have been the case historically. Some examples include: horizontal drilling reducing well numbers, electronic flow measurement reducing trips to the well, coiled tubing operations reducing completion time, etc. However, BLM's discussion of the use of directional or horizontal drilling methods should be based upon a number of factors that include geology, technological feasibility and economic viability. Even though this technology is viewed by many as a reasonable solution to surface disturbance concerns, BLM must recognize that these decisions can only be made with careful consideration to many other factors that influence a project's viability. Therefore, it would be inappropriate to impose across the Field Office a requirement that could render a well uneconomic or infeasible, particularly when existing leases do not require the use of alternative drilling techniques.

Laura Koval—Fidelity Exploration and Production Company: BLM's Fluid Minerals Planning Manual (H 1624-1) requires the use of the "least restrictive stipulations that effectively accomplishes the resource objectives." Additionally, there me laws in place to ensure the protection of resources (e.g., National Historic Preservation Act, Clean Air Act, Clean Water Act, Safe Drinking Water Act, and National Environmental Policy Act (NEPA). In addition to requiring consideration of mineral resources in the planning process, it is crucial for BLM to elevate mineral resources at an equal level with all other resource values. Hence, it is necessary for these resources to be represented equitably in not only the planning criteria but also factors that will be considered, by alternative, effects to be addressed in the analysis of environmental consequences and determinations used to select a preferred alternative. BLM should clearly state that mineral ownership of the United States is a legitimate property right, the United States has a legal right to develop their minerals, and one of the purposes of the RMP is to facilitate the right to develop these minerals. BLM should also acknowledge that existing federal oil and gas leases have valid existing lease rights, and new stipulations identified in the RMP Revision process cannot automatically amend such leases. Oil and gas are vital sources of energy for the nation. BLM should discuss increasing energy demands, decreasing domestic energy supplies, and the strategic necessity for development of mineral resources. Wyoming's Green River Basin oil and natural gas resources need to be identified as crucial to help offset the deficit between supply and demand. Federal lands contribute nearly

one-third of the nation's natural gas supply; therefore, accounting for every resource rich area is crucial to producers and consumers. The RMP should discuss the role of the planning area in the nation's oil and natural gas supplies. Oil and natural gas development plays an important role in meeting our economic and environmental quality goals. Wyoming (and Green River Basin) is rich in these resources and must continue to foster responsible exploration and production to meet increasing demand for this clean burning fuel. In this regard, every stipulation identified in the RMP Revision process should be subject to an analysis that demonstrates its effect on access, exploration and development of oil and natural gas reserves. BLM would greatly benefit from a comprehensive economic analysis of the impact of oil and gas to the region. For example, fifty percent of all federal taxes, royalties, fees, and bonuses are returned to the State of Wyoming.

Fern Linton—Oregon California Trails Association: Oil Shale development may not be part of short-term goals, but this plan will be in effect for many future years, and long-term impacts should be taken into consideration in regards to historic and cultural issues.

Nathon Maxon—Wyoming Outdoor Council: It is our view that four areas in the Rock Springs Field office should be made unavailable for future oil and natural gas leasing. These are the Jack Morrow Hills, Adobe Town, Little Mountain, and Cedar Mountain. Shape files that depict these areas are included in the attached CD. These areas represent 622,325, 468,295, 585,667, and 297,588 acres, respectively, or 1,973,875 acres in total. Our rationale for why areas should not be available for oil and gas development is presented throughout these comments--all of these areas have a dense collection of wildlife, cultural, special landscape, Native American traditional cultural place, paleontological, historic, and other values that make them inappropriate for leasing. In addition, we also requested above that the western unit of the Wind River Front Special Recreation Management Area (172,630 acres) not be made available for leasing under the revised RMP, as it is under the current RMP. Making this western unit available for leasing while the eastern unit is not creates an inherent and unneeded management tension that is a set-up for management conflict, and this should be rectified by removing this area from consideration for leasing. Moreover, as noted, oil and gas development in this area could threaten the vast network of protected areas represented by the Wind River Front Management Area in the Pinedale Field Office, the Jack Morrow Hills in the Rock Springs Field Office, and this area. We urge the Rock Springs Field Office to look to the Pinedale Field Office as an appropriate model for the scale of lands that should be available for oil and gas leasing. Under the revised Pinedale RMP, 455,340 acres of the Field Office has been designated unavailable for leasing. This represents 49 percent of the BLM surface acreage in the Field Office. In our view, this is an appropriate level of availability for oil and gas leasing. We take this view for several reasons that we ask the BLM to consider. First, under the pending amendment to BLM RMPs (including the Rock Springs RMP) to accommodate sage-grouse conservation needs, it is likely that this level of unavailability for leasing will need to be put in place. Second, it is clear that the Rock Springs Field Office is home to several large, landscape-scale iconic places, such as the Jack Morrow Hills. These large, wild landscapes simply should not be available for potential industrial development if we wish to retain a semblance of the Red Desert as we know it now. And third, oil and gas development must make way for renewable sources of energy as we move toward a clean, carbon-neutral energy future. We must reduce the level of fossil fuels in our energy portfolio, so making areas available for oil and gas development should not be given the priority it perhaps once enjoyed. Overall, including the western unit of the Wind River Front Special Recreation Management Area, we request that about 59 percent of the Rock Springs Field Office BLM surface estate be made unavailable for oil and gas leasing. This is consistent with the percentage unavailable for leasing in the Pinedale Field Office. As only one of the many multiple uses, we feel that leaving 41 percent of BLM lands in the RSFO available for oil and gas leasing is appropriate and necessary to protect other values within the Rock Springs Field Office

Nathon Maxon—Wyoming Outdoor Council: Oil and gas drilling and fracking has been implicated as a cause of groundwater pollution in Wyoming and elsewhere. A list of 944 products and at least 353

chemicals that have been used for oil and gas drilling is maintained by the Endocrine Exchange. When analyzing impacts from oil and gas operations, BLM should assess the risk that each of these chemicals poses to drinking water sources as well as the ecosystems associated with springs, seeps, streams, ponds, wetlands, and lakes if released into the natural environment. It is our view that an oil and gas lease gives the lease holder the right to do that which is reasonably necessary to develop a lease. However, using techniques that lead to surface or underground water pollution is, in our view, not reasonably necessary to the development of a lease and should not be allowed. Toward this end, we believe that BLM should implement the following measures to better understand groundwater resources and minimize pollution risk: Require a pre-drilling groundwater characterization of groundwater resources of areas to be developed in order to fully understand the location and flow parameters of aquifers, aquifer recharge areas, and surface water connections. Because many of the streams of the Little Mountain are spring-fed - streams that harbor Colorado river cutthroat trout - we believe that this area is a perfect first place for BLM to implement a full groundwater characterization study before any oil and gas development occurs. Require pre-drilling baseline water quality testing of groundwater resources that could be affected by drilling operations. BLM should require testing for the chemicals that are most widely used in drilling and fracking operations. Require ongoing water quality testing. In the event of contamination, mediation plans should be in place to isolate and extract underground contamination plumes and polluted surface waters. Require set-backs for drilling/fracturing operations from groundwater wells and from houses of at least 1/2 mile or possibly 1 mile. Require Pitless Fracking of all fracturing fluids to be used on-site must be stored in tanks, rather than in open pits of all fracturing fluids that are recovered during the fracturing process must also be stored in tanks and removed from the site or reused. Ensure the integrity of the wells to ensure that chemicals used in fracking do not migrate along the well bore into water bearing strata. Properly case, plug and abandon all wells no longer in use. Properly case and screen all wells that are in current use. Survey the area to ensure that there are no abandoned wells that are not properly plugged that could act as a conduit and pollute groundwater. Require pressure testing prior to introducing chemicals into a well bore. Require reporting of all instances of pressure loss when introducing chemicals into a well bore. Require periodic inspections of the integrity of well bore cement. Require cementing of well casings well below any groundwater bearing strata. Additional recommendations to reduce risk from oil and gas development are described in “Natural Gas Operations From a Public Health Perspective.” (31.) In addition, the U.S. Environmental Protection Agency is currently conducting a scientific study to better understand the risks associated with oil and gas drilling. In addition to our suggestions, we urge BLM to consider the results of the forthcoming EPA study as it strives to implement meaningful protection for groundwater and connected surface water resources.

Nathon Maxon—Wyoming Outdoor Council: On July 12, 2010 the Wyoming Outdoor Council and other groups requested that the BLM develop Master Leasing Plans (MLP) pursuant to the BLM’s leasing reform policy (Instruction Memorandum (IM) 2010-117) for three areas in the Rock Springs Field Office. Those areas were the Jack Morrow Hills, Little Mountain, and Adobe Town. That July 12 request letter 8 is included within Exhibit 1. Other groups have also requested that MLPs be developed in separate requests, at a minimum for the Little Mountain and Adobe Town areas. The BLM Wyoming State Office has developed a proposal for MLPs in Wyoming that is posted on its website. In this proposal, BLM would designate three categories of areas for MLP development. Category 1 is essentially areas where BLM takes the view that prior planning efforts meet MLP requirements. The Jack Morrow Hills is a Category 1 area. Category 2 is areas where BLM believes any need for an MLP can be met through the general planning (RMP) process underway in an area. The Little Mountain is a Category 2 area. Category 3 is areas where BLM believes no MLP is required. Adobe Town is a Category 3 area. The implications of the BLM State Office MLP proposal are that no MLPs will be developed anywhere in Wyoming. The Jack Morrow Hills -- despite being the only area in the entire State that met all MLP criteria specified in IM 2010-12 -- would not have an MLP developed, because the existing Jack Morrow Hills CAP is deemed to meet any MLP needs. Little Mountain also would not have an MLP developed, although as part of the Rock Springs RMP revision process and being a Category 2 area, BLM would “evaluate oil

and gas leasing decisions [ ] that address resources of concern and better fit [the decision to] the MLP criteria." And Adobe Town, as a Category 3 area, was deemed to not warrant an MLP in any respect. The Wyoming Outdoor Council believes this proposal is not warranted and does not meet the requirements of IM 2010-117. Consequently, we have sent a request to BLM Director Bob Abbey asking the BLM national office to modify this proposal. This letter is included within Exhibit 1. If the requests made in this letter are agreed to, MLPs would likely be developed for the Jack Morrow Hills, Adobe Town, and Little Mountain areas, as requested in our July 12, 2010, nomination letter. Now we realize this matter is in a state of uncertainty. If the BLM State Office's proposal holds, MLPs will not be developed for the Adobe Town and Jack Morrow Hills areas. And in the Little Mountain area, some new leasing guidance will be developed pursuant to the RMP process, but it will not be called an MLP. Or, the BLM Director might agree with our concerns and modify the State Office's proposal, requiring MLPs to be developed for some, or all, of the three areas. Because of this uncertainty, the Wyoming Outdoor Council renews its request that MLPs be developed for the Jack Morrow Hills, Little Mountain, and Adobe Town areas. The Jack Morrow Hills is the only area in Wyoming deemed to meet all MLP criteria. Thus, under the terms of IM 2010-117, an MLP is "required." And as discussed in our letter to Director Abbey, there is no credible basis for asserting that circumstances have not changed since the Jack Morrow Hills CAP was developed. And as to Adobe Town, as discussed in Exhibit 5, it, in fact, does meet criterion 3 (oil and gas development potential), despite contrary assertions in BLM's proposal. And Little Mountain deserves not an "MLP lite" but a full-blown MLP. Consequently, we again ask that MLPs be developed for these three areas. We are hopeful that BLM will honor these requests in the RMP revision. But perhaps all we will get is an MLP facsimile for the Little Mountain area if the BLM State Office's current proposal is maintained. If so, we request that the RMP analysis for his area consider the full suite of potential management prescriptions that are outlined in IM 2010-117. As specified in the IM, MLP decisions can include adding lease stipulations to potential leases or "closing certain areas to leasing." IM 2010-117 at 6. Furthermore, conditions of approval can be added to existing leases. (Id.) The MLP facsimile for Little Mountain should provide for attaching conditions of approval to development of existing leases so as to protect the important values in that area. And relative to either existing leases or any new leasing that is permitted, we specifically request that BLM fully consider the array of planning decisions that can be made through the MLP process. These include, but are not limited to, provisions for phased leasing and development, caps on surface disturbance, and the use of best management practices such as drilling multiple wells from a single pad, using existing infrastructure, and the use of liquids gathering systems (Id.) at 6-7. These types of provisions must be put in place so as to ensure the important values of the Little Mountain area are more adequately protected, although not engaging in any future leasing would best protect these values. And to the extent the BLM national office intervenes in MLP decisions, we ask that these provisions not only be considered for Little Mountain but also for the Jack Morrow Hills and Adobe Town.

Nathon Maxon—Wyoming Outdoor Council: The Wyoming Outdoor Council has designated three "Heritage Landscapes" in the Rock Springs Field Office. These landscapes - Adobe Town, Jack Morrow Hills, and Little Mountain - host a number of important values that are incompatible with energy development. It is the policy of the Outdoor Council that Heritage Landscapes "remain free from energy development" and that they are "too special to drill." Were energy development to nevertheless occur in these areas, it is our policy that any such development "should be handled with the highest possible sensitivity for wildlife, air and water quality, and human health." Given our policy of opposing energy development in these Heritage Landscapes, we request that BLM adopt provisions in the revised RMP to make these areas unavailable for future oil and gas leasing, oil shale development, wind energy development, and utility rights-of-way. Other sources of support for protecting these "Heritage Landscapes" include the Jack Morrow Hills Coordinated Activity Plan (CAP), especially the record of decision (ROD) implementing that plan, the State of Wyoming's designation of the Adobe Town area as a Very Rare or Uncommon Area, particularly the Environmental Quality Council's Findings of Fact, Conclusions of Law and Order establishing this area, which we have included as Exhibit 2, and as BLM

is well aware, local hunting and fishing groups treasure the Little Mountain area. These sources of information provide additional support for a decision in the RMP to make these Heritage Landscapes unavailable for energy development. However, were BLM to make these areas or portions of them available for energy development, it is our view that mitigation "should be handled with the highest possible sensitivity for wildlife, air and water quality, and human health." More specifically, the BLM should ensure that the full suite of protective stipulations at its disposal is applied to these areas. BLM is well aware of these stipulations, but they include stipulations to protect sage-grouse, raptors, threatened, endangered or special status species, protections for historical trails, and many others. Several Lease Notices and Special Lease Stipulations are applicable to these areas and should be rigorously applied. In light of scientific developments, many of the lease stipulations from the 1997 Green River RMP should be updated to reflect new knowledge and to ensure meaningful protection of the resources that the stipulations were originally intended to protect. And importantly, these Heritage Landscapes contain a number of specially designated areas, such special recreation management areas, WSAs, and ACECs. For example, the Red Creek ACEC is found in the Little Mountain Heritage Landscape, the Monument Valley Management Area is found in the Adobe Town Heritage Landscape, and special status areas too numerous to mention are found in the Jack Morrow Hills. The BLM sometimes applies a controlled surface use (CSU) stipulation to these special areas; it has done so when oil and gas lease parcels were offered in the Monument Valley Management Area. This CSU states that surface occupancy or use in the special management area "will be restricted or prohibited unless the operator and surface management agency arrive at an acceptable plan for mitigation of anticipated impacts" and then goes on to state what special values must be protected. We urge the BLM to ensure that this stipulation is applied to the Heritage Landscapes in their entirety as mapped in the enclosed shape files, or at a minimum is applied to every existing BLM designated special management area that is found within a Heritage Landscape.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Development Flexibility - In 2010, Governor Freudenthal asked the BLM for a moratorium on mineral leasing in this area outside existing federal units, primarily to allow this RMP process to move forward with an eye towards all multiple values found in the region. It is preferred not to withdraw any lands from mineral leasing, at the same time it is imperative development proceeds in a manner that recognizes and addresses wildlife, recreation, and agricultural uses of the landscape. This may be best addressed through permit requirements for disturbance timing and footprint, and through on-site and off-site mitigation and reclamation incentives (see below). Additionally, valid existing rights must be recognized. Only in those cases where it can be shown development will have an immediate and lasting impact on the remaining resource should complete withdrawal of permitting be considered.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Mitigation and reclamation - Meaningful and consistent mitigation maintaining ecosystem functionality while allowing for development is absolutely essential for any development plans in the area. This includes offsetting temporary disturbances and defining mitigation expectations in the RMP, directing focus on actual effects to habitat quality and quantity. An outcome-based approach to habitat enhancement is essential, and both habitat improvements and mitigation requirements must benefit the species most impacted by any development. The RMP should recognize and create the potential for companies to be included in efforts to improve habitat, particularly off-site, in order to maintain populations that may be impacted in the short term while development proceeds. At the same time, an adequate baseline of existing habitat, and improvement opportunities, is critical to the development of a resource plan that will have a lasting effect within this unique landscape.

Erik Molvar—Biodiversity Conservation Alliance: All sensitive lands outlined in this alternative where oil and gas development is restricted to No Surface Occupancy stipulations or recommended for withdrawal from leasing should also be withdrawn from suitability for coal extraction under SMCRA. In

addition, where coal mining is permitted, underground mines should be the first option and strip mines should not be permitted in cases where underground extraction is possible.

Erik Molvar—Biodiversity Conservation Alliance: Because CBM wastewater discharge is most commonly a constant and continuous input into aquatic systems, the chronic threshold levels are the most appropriate benchmark. For the Powder River Basin, Clearwater et al. (2002) reported that coal bed methane wastewater discharge could cause exceedances of these thresholds if large volumes of produced water were released. Trace mineral concentrations must never be allowed to rise above these levels.

Erik Molvar—Biodiversity Conservation Alliance: Finally, for areas where surface disturbance is permissible, both leasing and drilling activities should occur in a staged manner, allowing landscapes impacted by well fields to heal at the same rate as new landscapes are gobbled up. While staged development would at first appear to be a difficult program to implement, we have devised a simple method to facilitate this process. The BLM should first identify all parcels of 3,000 acres or more that [are] free of "roads," as defined under BLM Handbook H-6310-1, regardless of the presence or absence of wilderness qualities. This alternative would require a "No Net Loss" policy to be instituted for these qualified roadless areas, so that new roadless areas could not be entered for the purpose of road building and oil and gas development until a similar acreage already impacted was restored to "roadless" status. For leasing, BLM should offer subsets of a third or less of the planning area for leasing and drilling at any one time, and require that development and restoration be completed before moving on to new areas.

Erik Molvar—Biodiversity Conservation Alliance: Green completions prevent the venting and flaring of gas and other byproducts and capture more gas into pipelines where it can be put to use. This prevents both pollution and reduces impacts to climate change, as methane is a greenhouse gas 23 times more potent than carbon dioxide. The new RMP should mandate green completions in order to reduce pollution from the flaring and venting of natural gas during drilling, fracking, and completion operations.

Erik Molvar—Biodiversity Conservation Alliance: Hydraulic fracturing should be regulated under the new plan by preventing the use of toxic compounds like the BTEX group in any hydraulic fracturing that could possibly involve subsurface formations that serve as aquifers that feed wells, springs, or other surface flows.

Erik Molvar—Biodiversity Conservation Alliance: In addition, pitless drilling permits smaller well pads and eliminating toxic reserve pits filled with toxic chemicals. In cases where this and other state-of-the-art technology reduces the overall environmental impacts, it should be required under the RMP.

Erik Molvar—Biodiversity Conservation Alliance: Oil and Gas Leasing and Development: Sensitive landscapes and habitats (defined below) must be spared from the impacts of oil and gas development. In lands that are not especially sensitive, major reforms are needed to prevent widespread degradation of the land, to minimize the overall impacts of the oil and gas industry, and to make oil and gas development as compatible as possible with other multiple-use resources, including fish and wildlife habitat, watershed values, recreation, and wilderness. (1.) Pursuant to supplemental program guidance, the BLM shall determine which lands should be off limits to oil and gas leasing, including at minimum: Existing Wilderness Study Areas and citizens' proposed wilderness; Existing and Proposed ACECs; and Lands in Visual Resource Management Classes I and II under the original Green River RMP and Jack Morrow Hills CAP. (2.) BLM shall institute a program to suspend and/or trade to nullify currently existing leases in the above three categories of land. (3.) No new leasing shall occur on crucial winter ranges, crucial winter relief ranges, crucial winter yearlong habitats, of elk calving ranges as defined by WGFD while the Plan is being revised and No Surface Occupancy stipulations and mitigation measures will apply to these lands under the new plan. (4.) In the case of split-estate lands, the surface owner shall be given written notification prior to the offering of underlying subsurface mineral rights at a lease sale. (5.) BLM shall

prepare site-specific environmental analysis consistent with the requirements of NEPA § 102(2)(C) (i.e., an EIS) for leasing decisions on split-estate lands (e.g., federal minerals underlying private surface). Accordingly, under this approach, the RMP decision would defer leasing decisions on split-estate lands subject to subsequent site-specific analysis (which would be triggered by industry nomination to lease). (6.) BLM shall provide the record surface owner 45-day advance written notice of proposed leasing decision and opportunity to comment, including recommending specific lease stipulations. (7.) Staged development on existing leases shall be instituted to achieve no net loss of crucial winter ranges, crucial winter yearlong ranges, severe winter relief ranges, and elk calving ranges as delineated by WGFD. (8.) In cases where drilling is approved (subject to the limitations outlined below), directional drilling shall be required to minimize environmental impacts, unless a less environmentally harmful alternative is available. (9.) Areas may be leased only under a No Surface Occupancy Stipulation with appropriate buffers to guarantee protection of the special resources in question and will be excluded from surface development. Waivers may be granted for surface disturbances and developments if they will be completely invisible by line-of-sight from the site in question. These include: (a.) Lands within 5 miles of the Oregon/California/Mormon, Overland and Cherokee historic trails, the Continental Divide National Scenic trail, Native American Trails, or a site eligible for the National Register of Historic Places. (b.) Lands within Native American religious or cultural sites as identified by the tribes. (10.) Sensitive areas that will be leased under No Surface Occupancy stipulations and shall be withdrawn from surface disturbing activities on a year-round basis, with no waiver available: Lands where there is overlap between three or more types of wildlife crucial winter ranges, crucial winter relief areas, and elk calving areas as defined by WGFD, Other Areas of Critical Environmental Concern as outlined in the Western Heritage Alternative, areas within 1 mile of active raptor nests, areas within 3 miles of active sage grouse or 1 mile of sharp-tailed grouse leks, large prairie dog colonies and complexes, or those associated with BLM Sensitive Species, such as the black-footed ferret, burrowing owl, mountain plover, or swift fox, plus a ½-mile buffer zone around these colonies, critical habitats of Endangered and Threatened species, and areas within the 100-year floodplain of permanent or intermittent streams or within 500 feet of natural water sources or riparian vegetation. (11.) Wilderness Study Areas, including new citizens' proposed wilderness additions, will be withdrawn from mineral leasing and other surface disturbing activities. (12.) Oilfield exploration standards. (a.) Seismograph testing will take place without the construction of additional roads. Construction for the purposes of this policy shall include blading, grading, or the use of mechanical means such as hand tools. (b.) Shot-hole seismic exploration will be the preferred method for seismic exploration where sensitive archaeological resources are not threatened but shall be limited to hand-laying of geophone lines and helicopter transport of drilling rigs in sensitive landscapes outlined in Section 2. (13.) Exploration wells will be constructed within 100 feet of existing improved gravel roads, limited by the stipulations outlined above. If improved gravel roads are unavailable, previously constructed but unmaintained roadways may be upgraded, with the stipulation that the minimum length of roadway will be reconstructed and that these routes shall be returned to their original condition upon termination of production. (a.) Off-road travel on steep or unstable soils or during wet weather is prohibited. (14.) Oil and gas infill development. (a.) Wherever possible, infill production wells shall be sidetracked from existing wells or drilled from existing well pads or from cluster pads immediately adjacent to improved gravel roads and subject to the limitations of Section 1 (b.) Cluster pads shall be constructed at intervals that create the minimum practicable footprint. (c.) The construction of new roads will not be permitted for oilfield infill development unless exceptional difficulties are presented. (15.) Full-field development of new fields. (a.) Production wells shall be drilled from cluster pads immediately adjacent to existing improved gravel roads and subject to the limitations above; these cluster pads will be spaced at the widest possible spacing to minimize surface disturbance. (b.) The construction of new roads shall not be permitted unless the maximum interspersion cannot be met under the provisions of Section 4(b), subject to the limitations of Section 1. If new roads are constructed, the siting of cluster pads away from existing improved gravel roads will be achieved by minimizing the length of new road construction, using existing unimproved roadways wherever they are available. (16.) New oil and gas drilling activities shall be regulated under a Staged Development scenario: (a.) There shall be no net loss of unroaded or

undeveloped lands. Drilling will not be introduced into new unroaded or undeveloped areas until an equivalent acreage of formerly developed lands achieves undeveloped status. (17.) State-of-the-art drilling technologies, including but not limited to pitless drilling techniques (using closed-loop circulation of drilling muds), shall be employed for all exploration and production wells unless there is a less environmentally harmful alternative. (18.) Coal bed methane-produced water may either be reinjected into aquifers of similar water quality or treated to remove pollutants prior to discharge. Produced water from coal bed methane wells shall not be discharged onto soil surfaces or into water bodies if it might affect sensitive wildlife species, water quality, or soil productivity. (19.) The plan of operations shall include a reclamation plan, which describes in detail the methods and practices that will be used to ensure complete and timely restoration of all lands affected by oil and gas activities to the condition that existed prior to surface disturbing activities. Unless otherwise provided in an approved surface use plan of operations, reclamation shall be conducted concurrently with other operations. (20.) Disturbed lands should be returned to their natural condition immediately after the termination of development activities for oil and gas; bonds shall not be refunded until this requirement is met. (21.) Revegetation activities should re-create the original distribution and species composition on plant on the site prior to disturbance. (22.) The reseeding of disturbed sites shall use only native species of plants. (23.) Topsoil shall be retained for all surface-disturbing activities and shall be replaced during reclamation activities. (24.) The obligation to complete reclamation will persist until the site is substantially returned to its natural condition.

Erik Molvar—Biodiversity Conservation Alliance: One method of surface disposal for coal bed methane wastewater is to discharge it into unlined reservoirs, either along drainage channels or away from them. Such reservoirs are designed to leak the wastewater gradually into the soil, where it joins groundwater in its down-gradient flow to the nearest surface stream. In earthen dams with high clay content, “piping” of water through the clay of the dam is a likely outcome of storage of highly saline waters, resulting in leakage of stored water into the channel below and ultimately failure of the dam. This should not be allowed; instead, underground injection under state standards should be required.

Erik Molvar—Biodiversity Conservation Alliance: Seismic exploration projects also deserve special planning to minimize their impacts on lands and wildlife. The most prevalent method, 3-D seismic exploration, can be accomplished through two distinct techniques. In both types of seismic work, strings of receivers called “geophones” are strung out along set patterns across the landscape to pick up vibration signals from artificial sources. “Vibroseis” techniques employ 56,000-pound trucks that lower a 6,000-pound vibrating pad to create the vibration. “Shot hole” methods employ drilling shallow holes and setting off explosive charges to set up the vibration signals. When properly conducted, this method can be a lower-impact alternative to vibroseis.

Erik Molvar—Biodiversity Conservation Alliance: The new RMP should include measures that prevent or minimize habitat fragmentation. These should include a moratorium on surface density of well pads greater than one pad per square mile. This would serve to centralize facilities (and this disturbance from human activity and vehicles), reduce the number of access roads and pipelines needs, and reduce the level of dust and exhaust pollution from vehicles traveling along gravel roads.

Erik Molvar—Biodiversity Conservation Alliance: The surface discharge of coal bed methane wastewater must be strictly prohibited in the Little Snake watershed.

Erik Molvar—Biodiversity Conservation Alliance: Under the new plan, wastewater should be reinjected into aquifers of similar qualities or treated to match surface water qualities and put into domestic or agricultural use. In addition, in cases where changes of temperature, flow pattern, or water properties might cause impacts to rare native fishes or otherwise threaten the viability of native species, wastewater reinjection would be mandatory.

Erik Molvar—Biodiversity Conservation Alliance: Whenever oil and gas development is pursued under the new RMP, it should employ available technologies in a way that minimizes damage to the environment. Attached to these comments you will find the report, Drilling Smarter: Using Directional Drilling to Reduce Oil and Gas Impacts in the Intermountain West. We incorporate this report and all of the studies referenced therein into these comments by reference. In areas where surface disturbance from drilling is appropriate (i.e., outside areas recommended for NSO stipulations or withdrawal from leasing), directional drilling and other technologies should be employed in every case where they reduce the environmental impacts over conventional methods. Because clustering wells on a few isolated pads for full-field development or drilling horizontally from existing well pads in infill situations results in a radical decrease in road, well pad, and pipeline construction, directional drilling should become the standard drilling procedure under the new plan.

Michael N. Rudoff: Land that has already been developed/leased for mineral development should be utilized for that purpose, but only with the strictest regulations governing access, environmental controls, and reclamation in-place and enforced.

Phillip Schlagel—Anadarko Petroleum Corporation: BLM must ensure that a thorough examination of the opportunities for future development of mineral resources occurs and that any restrictions placed on development are scientifically supported. Further, BLM must take into Consideration the unique landownership pattern as it develops management alternatives. As such, Anadarko requests that the following aspects of resource management be analyzed: (a.) Management options that would protect existing or enhance new opportunities to explore for and develop the mineral resources; (b.) Management options for surface resource management that are compatible with mineral resource management objectives and with application of the least restrictive constraints that still meet the resource protection objective; (c.) Allowances for application of new information, technology or economic conditions on lands with unknown, low and moderate oil and gas potential. Management decisions for these lands should permit future exploration and production activities, should the new information, technology or economic conditions support such activities; (d.) The effects on opportunities for exploration, leasing and development of mineral resources resulting from restrictive surface management decisions. Reduced access to public lands for purposes of exploring for and producing mineral resources should be considered a separate issue from economic impacts; (e.) Limits on the imposition of stipulations to only those that are necessary after the application of standard lease terms and conditions. For example, under the 43 CFR 3101 regulations, a two-month occupancy restriction can be imposed under standard terms and conditions of a lease to protect critical habitat. Therefore, if the typical restriction used to protect calving areas is two months, no stipulation is needed because the BLM has the authority to restrict an operator, if necessary, to protect such areas under the standard terms of the lease. A lease notice apprising the lessee that calving grounds exist on the lease should be sufficient; (f.) The inappropriateness of directional drilling as a mitigation tool at the resource planning level. Informational needs such as, increased costs of drilling and production, effect of increased costs on resource recovery, technical limitations (interplay of well depth, well spacing and target zones), technical abilities (e.g., extent of lateral distances achievable), and risks (both economic and well integrity) are only available at the development proposal stage. Any discussion of directional drilling should be limited to a discussion of the assessment factors that may be used when addressing directional drilling alternatives in project-level documents; (g.) The socio-economic benefits of mineral development activities identifying the costs of administering the mineral program and industry's financial contributions to Wyoming schools, local, state and federal treasuries; (h.) The socio-economic impact caused by the extensive application timing limitation stipulations such that it causes a seasonal demand for supplies, labor and equipment. Coordination of development options and management scenarios with the Kemmerer Field Office to reduce the possibility of conflicting management directions.

Phillip Schlagel—Anadarko Petroleum Corporation: BLM should strongly promote geophysical activities throughout the planning area. Geophysical operations are perhaps the most adaptable and environmentally friendly exploration activity. Past experience on BLM lands has proven that geophysical activities can be adapted to protect wilderness values and the most sensitive wildlife values. Seismic exploration is of great value in deciding where not to drill, thereby eliminating unnecessary surface disturbances associated with drilling. There is simply no reason to disallow the benefits that can be obtained from conducting geophysical activities across the entire planning area.

Phillip Schlagel—Anadarko Petroleum Corporation: It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive-recreational values and opportunities. The oil and gas industry has demonstrated repeatedly its ability to operate in sensitive areas with minimum effects on other resource values. There has been some discussion that primitive or semi-primitive recreation should be juxtaposed in the analysis to demands for roaded recreation opportunities. A decision to further remove lands from the constantly diminishing multiple-use land base would have a detrimental impact on local economic opportunities and welfare. Consequently, Anadarko would necessarily strongly object to a no-lease or no-surface occupancy stipulation decision for areas allocated to semi-primitive recreation.

Phillip Schlagel—Anadarko Petroleum Corporation: The revised RMP must ensure that BLM will have a program in place to monitor the effectiveness of stipulations and conditions of approval (COA). Since land use planning is so time-consuming, it is extremely important for BLM to be able to determine, well in advance, if predicted impacts associated with oil and gas development are close to being met. This can best be achieved if it is well understood that stipulations and COAs are either meeting their intended result, failing to meet their intended result or are overly restrictive. In a similar fashion, other resource (i.e., grazing, mining, climate, vegetation management, wildlife management, air/water quality) monitoring must occur simultaneously to ensure that sufficient information is available to determine causation of impacts. BLM must be clear in the RMP of its monitoring objectives, criteria and timeframes, and BLM's responsibility for such monitoring efforts. Additionally, BLM employs parameters or limits on development to make comparison of impacts among any number of alternatives analyzed. The RMP/EIS should make it clear that these analysis parameters (i.e., well numbers, total long-term acreage disturbances, etc.) are merely tools for comparison of alternatives and not strict limits on development. To be more precise, once monitoring indicates that those limits will soon be reached, it is a signal to BLM that additional analysis and possible revisions to the RMP need to be considered. It is not a signal that development needs to cease. By employing the above principles, BLM can have ample opportunity to initiate new planning efforts, if needed, and determine the effectiveness of mitigation measures while ensuring long-term continuance and certainty of oil and gas development in accordance with planning decisions.

Phillip Schlagel—Anadarko Petroleum Corporation: While Anadarko supports this provision and process, BLM should not premise potential surface disturbance based on application of technologies where it remains undetermined if the resource play in question can either economically or technologically support application of that technology. An example would be directional or horizontal drilling. Anadarko also requests that BLM consider in its alternatives a continuance of mineral leasing should the RFD scenario (i.e., projected impacts) be exceeded. Oil and gas leasing is a discretionary agency action, and, as such, BLM should not automatically prohibit leasing when impacts are exceeded. Rather, BLM must retain the ability to make site-specific determinations on leasing.

Kathleen M. Sgamma—Western Energy Alliance: For the Reasonable Foreseeable Development (RFD) scenarios for this RMP, BLM should use the latest available data on the resource potential, factoring in unconventional reserves and technological advances. Technologies like directional drilling, horizontal drilling and hydraulic fracturing have dramatically increased operators' ability to recover

hydrocarbons from unconventional resources, depleted fields, and resource plays that were once considered uneconomic. As part of the planning process the BLM should account for these improved technologies that allow operators to work from either existing well pads or minimize creation of new well pads as it sets any limits on "well count" per section. Higher well counts do not need to translate linearly to the surface impact. This is especially true in land sections with existing development that already have an existing infrastructure support.

Kathleen M. Sgamma—Western Energy Alliance: The Rock Springs Resource Management Plan (RMP)/Environmental Impact Statement (EIS) should acknowledge that [the] oil and natural gas industry can develop resources in an environmentally friendly manner and strives to ensure that the impact of development is as small as possible. Each year, improvements in technology reduce the footprint of development, and reclamation techniques continue to improve so that the impact to the land is small and temporary. The BLM should consider that the impacts of development are indeed temporary when developing a vital energy resource.

Heather Smith—EOG Resources, Inc.: The development of oil and gas resources from public lands is a critical part of the BLM's responsibilities. See 43 U.S.C. § 1702(1) (defining mineral exploration and development as a principal or major use of public lands). Under FLPMA, the BLM is required to manage the public lands on the basis of multiple use and sustained yield. 43 U.S.C. § 1701(a)(7) (2006). "'Multiple use management' is a deceptively simple term that describes the enormously complicated task of striking a balance among the many competing uses to which land can be put, 'including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and [uses serving] natural scenic, scientific and historical values.'" Norton v. Southern Utah Wilderness Alliance, 542 U.S. at 58 (quoting 43 U.S.C. § 1702[c]). "Of course not all uses are compatible." (Id.) EOG recognizes the difficult task the BLM faces to manage public lands in the Rock Springs Field Office for multiple use, but encourages the BLM to remember that oil and gas development is a crucial part of the BLM's multiple use mandate. The BLM must ensure that oil and gas development is not unreasonably limited in the revision to the Rock Springs RMP.

Heather Smith—EOG Resources, Inc.: When developing alternatives for the Rock Springs RMP and accompanying EIS, the BLM must ensure that the alternatives analyzed are both feasible and economic. The Council on Environmental Quality ("CEQ") has described reasonable alternatives as "those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable." CEQ's Forty Most Asked Questions, Question 2a, 46 Fed. Reg. 18028, 18027 (Mar. 23, 1981) (emphasis added). BLM need not analyze speculative, impractical, or uneconomic alternatives. Citizens' Comm. To Save Our Canyons, 297 F.3d at 1030-31. For example, overly stringent restrictions or conditions of approval ("COA") may render development uneconomic and need not be analyzed. Further, given the fact the public lands must be managed for multiple uses, including oil and gas development, and given the fact that much of the lands managed by the Rock Springs Field Office are currently leased for oil and gas development, alternatives that prohibit or eliminate all oil and gas development within the area are neither practical nor reasonable and need not be studied in detail by the agency.

Heather Smith—EOG Resources, Inc.: When revising the Rock Springs RMP, the BLM should ensure that stipulations developed for future oil and gas leasing are the least restrictive necessary to adequately protect other resource values. Since the BLM issued the Rock Springs RMP in 1985, Congress passed the Energy Policy Act of 2005. Section 363 of that Act required the Secretary of the Interior and the Secretary of Agriculture to enter into a Memorandum of Understanding regarding oil and gas leasing and to ensure that lease stipulations are, "[as] restrictive as necessary to protect the resources for which the stipulations are applied." Energy Policy Act of 2005, Pub. L. No. 109-58, § 363(b)(3), 119 Star. 594, 722 (2005). The Memorandum of Understanding required by § 363 of the Energy Policy Act of 2005 was

finalized in April of 2006 as BLM MOU WO300-2006-07. The stipulations for oil and gas leases within the revised Rock Springs RMP should not be onerous or more restrictive than necessary.

Cheryl Sorenson—Petroleum Association of Wyoming: Areas of low, moderate, high and unknown potential for oil and gas in the study area: BLM is responsible for assessing the potential for occurrence of oil and gas resources during the analysis process. We would like to emphasize that the lack of potential or lack of current industry interest should not be considered a basis for closing lands or imposing constraints on future development. Levels of interest can change overnight, rendering an area previously considered to have low potential highly prospective due to new information, technology or economics. It is important that future opportunities to explore for, and develop, oil and gas resources not be indiscriminately foreclosed.

Cheryl Sorenson—Petroleum Association of Wyoming: BLM had originally planned not to prepare any master leasing plans (MLP) within Wyoming, because there were no areas that met the four criteria outlined in Instruction Memorandum 2010-117. Since then, BLM has been required by the Department of Interior to evaluate 21 proposed MLPs submitted to the Wyoming State Office by a number of environmental groups and coalitions. Even though it was found that the Greater Little Mountain Area clearly failed to meet the MLP criteria established by the Department, BLM has indicated it intends to prepare a master leasing plan (MLP) for the Greater Little Mountain Area. In addition, new leasing will be deferred in this area pending MLP completion. We fully agree with BLM's original assessment that the Greater Little Mountain Area doesn't even remotely meet the criteria established for considering preparation of an MLP. As BLM previously noted, 75 percent of the area is already under federal lease and includes several existing federal units. In addition, nearly the entire northern half of the proposed MLP area is covered with a checkerboard ownership pattern between private ownership, over which BLM has no management authority and federal land. As such, BLM will have virtually no ability to manage activities in the area. In fact, we have noted very little unleased federal acreage exists within the proposed MLP boundary outside the Great Red Creek ACEC, with the exception of areas already deferred from leasing due to wildlife concerns pending completion of the RMP revision. PLA and PAW oppose preparation of a Master Leasing Plan for the Greater Little Mountain Area, because it fails to meet the MLP criteria and because it simply reflects the unwarranted, excessive influence environmental groups continue to have on the Department of Interior. We do, however, recognize BLM's dilemma with respect to this undue pressure. Therefore, if BLM is forced to move forward with the MLP, in the interest of time and money, it is critical that it be completed as part of the RMP revision process as opposed to a separate analysis and decision document. Additionally, neither the revision nor MLP processes should be used as a basis to hinder development of existing leases within the proposed MLP area. Since BLM has the Green River RMP to use as the basis for land use decisions during preparation of the revision and MLP, we urge BLM to eliminate lease deferrals within the MLP area. As justification, we quote from page 3 of the summary of the Statewide MLP Evaluation, "Although the RODs did not use the term 'Master Leasing Plan,' the analysis and associated management decisions contained in the ROD within the boundary of the proposed MLP identify and address all potential resource conflicts and environmental impacts from development. The existing NEPA planning document is considered protective of resource values normally evaluated during development of a MLP and was based on a broad, area perspective."

Cheryl Sorenson—Petroleum Association of Wyoming: BLM has the authority to continue to approve on-going explorations and development activities during the planning process. Approval of such actions is essential in light of the numerous, valid existing lease rights that exist within the Rock Springs field office.

Cheryl Sorenson—Petroleum Association of Wyoming: During the land use planning process, BLM prepares a Reasonably Foreseeable Development Scenario (RFD) that is used to estimate potential impacts associated with oil and gas development for planning purposes. According to current guidance,

BLM must construct and analyze the RFD as a "baseline scenario of activity assuming all potential production areas can be open under standard lease terms and conditions, except those areas designated as closed to leasing by law, regulation or executive order." The baseline RFD Scenario is intended to represent the maximum level of oil and gas development possible within the planning area so the agency can better discern variances among alternatives as they relate to opportunities for continued or future oil and gas development. Furthermore, the discussion of cumulative impacts related to future development should include not only possible impacts of oil and gas activities but also the measures routinely employed to mitigate any adverse effects. This gives both BLM and industry needed flexibility in future development opportunities, such as drilling multiple wells from a single pad or taking into consideration wells that have been plugged and abandoned. Additionally, in order to avoid past concerns, we recommend that BLM monitor the viability of the RFD throughout the planning process to ensure no significant changes occur which could render plan decisions out of date. BLM typically relies on geological information, production records, and past drilling activity levels to develop the RFD, which is an estimate of the level of surface disturbance projected to occur in the planning area over the life of the RMP. It has been our experience that RFDs have either been prepared without input from the oil and gas operators in the area or have not been kept current throughout the process. Instead, BLM has relied upon static US Geological Survey or other federal agency information. We encourage BLM to treat the RFD as a dynamic component of the planning process that is routinely updated by utilizing industry data and by meeting regularly with industry as a way to stay apprised of fluctuations in future plans within the planning area. Since the primary use of the RFDS is as a tool to aid consideration of cumulative effects, it is important to make sure it is as accurate as possible. Additionally, BLM should not limit the scale of the RFD Scenario to known oil and gas potential. Other factors should be considered, such as the possibility that new technology may expand the potential for oil and gas recovery, new oil and gas reserves and fields may be discovered, and changing economics may open previously unprofitable areas to exploration and development.

Cheryl Sorenson—Petroleum Association of Wyoming: In addition to requiring consideration of mineral resources in the planning process, it is crucial for BLM to elevate mineral resources to a level with all other resource values as part of the agency's multiple use mandate. Hence, we ask that fluid minerals be represented equitably in not only the planning criteria but also in factoring which will be considered alternative effects to be addressed in the analysis of environmental consequences and determinations used to select a preferred alternative. We recommend including the following factors in the planning analysis: Management options that would protect or enhance opportunities to explore for and develop oil and gas resources will be examined. Management options for surface resource management that are compatible with oil and gas resource management objectives. Reasonable mitigation measures designed to limit or avoid impacts to surface resources as a means to lessen restrictions on access to public lands for leasing. Lack of oil and gas resource potential or current industry interest will not be used as a basis for closing lands or imposing constraints on exploration and development activities.

Cheryl Sorenson—Petroleum Association of Wyoming: It has become increasingly apparent that many believe the oil and gas industry can use directional or horizontal drilling technology in any situation, particularly to reduce potential effects on surface resource values. Determinations of the feasibility of directional drilling or any other unconventional drilling technology can be made only by the operator. Additionally, the feasibility of directional/horizontal drilling technology is determined on a well-specific basis. Generally, this technology is used for field development rather than exploration activities. It should also be noted that exploratory drilling is already a difficult and expensive undertaking, because it is an attempt to determine where a structure may occur without the added knowledge of data from previously drilled wells in the area. The technical limitations of directional/horizontal drilling do not make it a reliable tool for most exploration wells. Additionally, it is unpredictable and costly in areas with excessive gas production, because well control becomes difficult and the odds of encountering serious well control problems are radically increased. Formations that require sharp, high-angle deviations are

also not good candidates for directional drilling. Deviated wells may be problematic even in the production stage due to the high angle turn in the pipe. The exponential increase in cost coupled with increased mechanical challenges could prevent many such projects from ever being drilled and, thus, related benefits in terms of revenue and product are not realized the by the state or the nation. Therefore, it would be inappropriate to impose across the Field Office a requirement that could render a well uneconomic or infeasible, particularly when existing leases do not require the use of alternative drilling techniques.

Cheryl Sorenson—Petroleum Association of Wyoming: Specifically identify available mitigation measures to minimize or avoid possible impacts that could result from future oil and gas activities: Section 1502 of the Council on Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in the EIS, which may be employed to reduce or entirely avoid impacts to other resource values. While this could be construed to mean that only lease stipulations need to be identified, we believe it is crucial to discuss other types of mitigation, which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is necessary, because it illustrates that with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas. Disclose how opportunities to explore for and develop oil and gas resources will be affected by the management of other surface resource management decisions. Most past BLM planning documents have discussed the impacts oil and gas activities may have on other resource values, but they have failed to adequately describe the effects surface resource management decisions may have on future subsurface opportunities and activities. Therefore, we strongly urge BLM to describe the impacts of surface management decisions and trade-offs selected as they relate to oil and gas opportunities.

Cheryl Sorenson—Petroleum Association of Wyoming: The effects on oil and gas opportunities from surface management is only tied to - not limited to - economic impacts. Access to public lands for purposes of exploring for and producing oil and gas resources must be considered a separate issue from economic impacts. It must also be explained how surface management constrains the availability of public lands for leasing, exploration and potential development. Moreover, compliance with the various leasing laws that require all lands to be evaluated for lease is an access issue that has nothing to do with economics. We recommend an analysis of the following types of effects be included in the environmental consequences section of the RMP: Direct effects on opportunities to explore for, lease and develop oil and gas resources resulting from restrictive surface management decisions, (i.e., lands with wilderness characteristics, new Areas of Critical Environmental Concern (ACECs), wildlife management areas). The application and viability of reasonable mitigation limit the study to any residual effects that may be present after standard lease terms and conditions have been imposed. (For example, under the 43 CFR 3101 regulations, a two-month occupancy restriction can be imposed under standard terms and conditions of a lease for purposes of protecting critical habitat. Therefore, if the typical restriction used to protect calving areas is two months, no stipulation is needed, because the BLM has the authority to restrict an operator, if necessary, to protect such areas under the standard terms of the lease. A lease notice apprising the lessee that calving grounds exist on the lease should be sufficient).

Cheryl Sorenson—Petroleum Association of Wyoming: We urge that Planning Criteria identified for the planning process include assurances that valid existing lease rights will be honored in the revised plan. BLM needs to specify in the planning documents if, and how, valid existing lease rights could be impacted by new leasing or management decisions. Specifically, potential conditions of approval for operations and other changes should be identified. The concept of offsite mitigation was developed by the petroleum industry to offset potential impacts associated with specific development projects located in highly sensitive areas or areas of dense development where existing stipulations created a roadblock to completing a project in an efficient and cost-effective manner. Historically, it was the DOI Solicitor's

Opinion that BLM could not accept offers of offsite mitigation. However, a change in interpretation of the law now allows BLM to capitalize on industry's enthusiasm to work with the agency to ensure important energy projects can move forward. Consequently, despite industry's willingness to implement offsite mitigation when deemed necessary, BLM has often chosen to make offsite mitigation a requirement whenever the agency deems it is "necessary." Of greatest concern to our members is that the BLM often fails to adequately recognize that lessees have valid existing rights as determined by lease stipulations and fails to explain how these rights will be honored when making decisions regarding where offsite mitigation must be applied. We urge BLM to use off-site mitigation only in areas where no other options exist.

Russell A Spencer—Azalea Oil Company, LLC: In developing the Rock Springs RMP, the BLM should provide for and allow itself sufficient flexibility to utilize the categorical exclusions developed by Congress to streamline oil and gas permitting on federal lands.

Russell A Spencer—Azalea Oil Company, LLC: Oil and gas drilling and completion operations should not be restricted during hunting seasons, because such a restriction would not permit an oil and gas Lessee enough time to drill and complete a well. This is especially true if a Lessee is not allowed to drill during a big game crucial winter range stipulation period.

Russell A Spencer—Azalea Oil Company, LLC: The areas open to oil and gas leasing should be offered at forthcoming oil and gas lease sale(s).

Russell A Spencer—Azalea Oil Company, LLC: The BLM has indicated that it intends to retain current livestock trails. Oil and gas Lessees should have reasonable use of such trails. The BLM must be willing to work with oil and gas Lessees to design access routes to proposed oil and gas development projects.

Russell A Spencer—Azalea Oil Company, LLC: The BLM should not prohibit routine production operations necessary to safely maintain oil and gas facilities during big game crucial winter range stipulation periods.

Russell A Spencer—Azalea Oil Company, LLC: The BLM should respect existing oil and gas leases and the stipulations attached thereto.

Russell A Spencer—Azalea Oil Company, LLC: The Rock Springs Resource Area has significant potential for oil and gas development. The BLM should not underestimate the potential for development.

John Spezia: Place Adobe Town, Kinney Rim, and Jack Morrow Hills off-limits to future oil and gas leasing and other types of heavy industry for the benefit of wildlife and public recreation.

John Spezia: We need to use advanced technologies like directional drilling to Desert elk near Freighter Gap to ensure that oil and gas fields limit their footprint to one well pad per square mile or less.

Lee Splett: Oil and Gas: Increased emphasis on spill prevention, containment of vapors, and produced water needs to be specifically addressed. All vessels containing potentially hazardous material, such as separators, dehydrators, storage tanks, and other processing equipment, must be surrounded by an impermeable berm. The use of liners inside the berms must be required. Inspection has shown that almost all existing production equipment leaks, or has leaked, hazardous material.

Chuck Vandervort: Please don't allow any more drilling on Little Mountain, because it has long been our families "sacred" hunting ground for three generations, and it grieves my heart to see it ravaged and ruined forever by drilling exploration.

Brian Voigt—Crown Energy Partners, LLC: Does BLM plan to amend the Reasonable Foreseeable Development (RFD) scenarios for this RMPs in order to accommodate more extensive management requirements? If so, BLM should use the latest available data on the resource potential, factoring in unconventional reserves and technological advances. Technologies like directional drilling, horizontal drilling and hydraulic fracturing have dramatically increased operators' ability to recover hydrocarbons from unconventional resources, depleted fields, and resource plays that were once considered uneconomic. As part of the planning process, the BLM should account for improved technologies (directional & horizontal drilling) that allow operators to work from either existing well pads or minimize creation of new well pads as it sets any limits on "well count" per section. Higher well counts do not need to translate linearly to the surface impact. This is especially true in land sections with existing development that already have an existing infrastructure support.

Brian Voigt—Crown Energy Partners, LLC: The RMP/EIS should acknowledge that oil and gas industry can develop resources in an environmentally friendly manner and strive to ensure that the impact of natural gas development is as small as possible. Each year, improvements in technology reduce the footprint of development, and reclamation techniques continue to improve so that the impact to the land is small and temporary. The BLM should consider that the impacts of development are indeed temporary when developing a vital energy resource. Natural gas development does not preclude other multiple uses. Once a well is drilled, which usually takes several weeks, interim reclamation can begin to occur and the land is once again available for hunting, hiking, and other recreational purposes. Once wells are plugged and abandoned and final reclamation occurs, the disturbance to the land can be barely discernible.

Shay Westbrook—Yates Petroleum Corporation: According to BLM IM-2001-191: "When a[n] RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies. The BLM has the authority and discretion to condition its approval of proposed actions (APDs and other site-specific activities) with reasonable measures (including relocation, redesign or delays in the proposed action) so as to reduce the effect of actions on other resource values and uses, consistent with the lease rights granted (see 43 CFR 3101.1-2). That is, BLM can use its authority and discretion to condition its approval of proposed actions to not constrain alternatives under consideration in an RMP revision or amendment consistent with the lease rights granted. Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office." We urge BLM to follow the requirements in the Instruction Memorandum and provide for interim development during the current planning process.

Shay Westbrook—Yates Petroleum Corporation: BLM is responsible for assessing the potential for occurrence of oil and gas resources during the analysis process. We would like to emphasize that the lack of potential or lack of current industry interest should not be considered a basis for closing lands or imposing constraints on future development. Levels of interest can change suddenly, rendering an area previously considered to have low potential highly prospective due to new information, technology or economics. It is important that future opportunities to explore for and develop oil and gas resources not be indiscriminately or prematurely foreclosed.

Shay Westbrook—Yates Petroleum Corporation: Many past BLM planning documents have discussed the impacts oil and gas activities may have on other resource values, but they have failed to adequately describe the effects surface resource management decisions may have on future oil and gas development

opportunities and activities. It is important for BLM to consider and disclose how opportunities to explore for and develop oil and gas resources will be affected by the management of other surface resource management decisions. Therefore, we strongly urge BLM to describe the impacts of surface management decisions and the potential trade-offs associated with such decisions as they relate to oil and gas opportunities.

Shay Westbrook—Yates Petroleum Corporation: Section 1502 of the Council on Environmental Quality (CEQ) Regulations on the National Environmental Policy Act (NEPA) directs that mitigation measures be identified in the EIS, which may be employed to reduce or entirely avoid impacts to other resource values. While this could be construed to mean that only lease stipulations need to be identified, we believe it is crucial to discuss other types of mitigation, which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is necessary, because it illustrates that, with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas. As such, we urge BLM to specifically identify mitigation measures available to minimize or avoid possible impacts that could result from future oil and gas activities.

Shay Westbrook—Yates Petroleum Corporation: The concept of offsite mitigation was developed by the petroleum industry to ameliorate potential impacts associated with specific development projects located in highly sensitive areas or areas of dense development where existing stipulations created a roadblock to completing a project in an efficient and cost-effective manner. Historically, it was the DOI Solicitor's opinion that BLM could not accept offers of offsite mitigation. However, a change in interpretation of the law now allows BLM to capitalize on industry's enthusiasm to work with the agency to ensure important energy projects can move forward. Consequently, despite industry's willingness to implement offsite mitigation when deemed necessary, BLM has chosen to make offsite mitigation a requirement whenever the agency deems it is "necessary." Our greatest concern is that BLM policy fails to adequately recognize that lessees have valid existing rights, as determined by lease stipulations, and fails to explain how these rights will be honored when making decisions regarding where offsite mitigation must be applied. We urge BLM to use off-site mitigation only in areas where no other options exist.

Shay Westbrook—Yates Petroleum Corporation: The following factors should be included by BLM in the analysis: Management options that would protect or enhance opportunities to explore for and develop oil and gas resources will be examined. Management options for surface resource management that are compatible with oil and gas resource management objectives. Reasonable mitigation measures designed to limit or avoid impacts to surface resources as a means to lessen restrictions on access to public lands for leasing. Lack of oil and gas resource potential or current industry interest will not be used as a basis for closing lands or imposing constraints on exploration and development activities.

Shay Westbrook—Yates Petroleum Corporation: The Planning Criteria identified for the planning process indicates valid, existing lease rights will be honored in the revised RMP. Nevertheless, BLM needs to specify in the planning documents if, and how, valid existing lease rights could be impacted by the new leasing or management decisions. Specifically, potential conditions of approval (COA) for operations and other changes should be identified.

Shay Westbrook—Yates Petroleum Corporation: We commend BLM for thoroughly evaluating the 21 Master Leasing Plan (MLP) nominations in Wyoming and support BLM's decision to refrain from conducting additional MLP analysis in a majority of these areas, including the Adobe Town, Greater Adobe Town and Jack Morrow Hills areas located within the Rock Springs Field Office boundary. As BLM concluded in the "Statewide MLP Evaluation" (2010), these areas do not warrant further MLP consideration and were properly given a Category 1 or Category 3 designation by BLM. Requiring an

MLP in a given area will have a significant impact on oil and gas development, because it will trigger [an] additional site-specific NEPA evaluation (usually in the form of an EA or possibly an EIS). NEPA evaluation is a costly and time-consuming process for both the operator and BLM. Additionally, BLM has stated that in order "to preserve decision space, oil and gas leasing will be deferred in key areas [being evaluated for a[n] MLP during the RMP revision process] until the release of the draft EIS and proposed plan (Statewide MLP Evaluation, pg. 41)." Consequently, mere evaluation of whether or not preparation of an MLP is required may significantly impact oil and gas development. In light of the implications associated with an MLP, we urge BLM to adhere to the four (4) criteria required for an MLP (BLM IM No. 2010-117) and refrain from merely exercising discretion when evaluating whether or not preparation of an MLP is required. This will result in a more predictable, rational and accountable evaluation process. Furthermore, what is the point of establishing criteria for MLP preparation if those criteria are rendered irrelevant by discretionary determination of MLP areas? BLM has determined that the Greater Little Mountain Area (GLMA) does not satisfy MLP criteria 1-3. However, exercising discretionary authority, BLM has decided to evaluate the proposed MLP boundary for the GLMA MLP (located within the Rock Springs Field Office boundary) during the preparation of the RMP for the Rock Springs Field Office. For reasons discussed above, BLM should refrain from further considering this area as an MLP based solely on the exercise of discretionary authority. Previously leased lands are located within the GLMA. Development of existing leases within the GLMA should not be pulled and/or delayed until completion of the draft EIS and proposed RMP. We urge BLM to reconsider deferring leasing in the GLMA until the release of the Draft RMP/EIS, as currently proposed by BLM in the Statewide MLP Evaluation. Leasing should not be categorically deferred in the GLMA until the release of the draft EIS and proposed plan when it has clearly been established that the GLMA does not meet three of the four criteria required for preparation of an MLP. There is concern that combining the MLP evaluation process with the RMP revision will delay the progress of the RMP revision. As such, we urge BLM to create and adhere to a schedule for rolling the MLP into RMP and urge BLM to complete the RMP revision in a reasonable timeframe. MLP evaluation and development of the new RMP should not halt or delay ongoing activities, permitting, etc. within the RMP boundary until the RMP is completed, because there is an existing RMP in place that can be followed during this time.

Shay Westbrook—Yates Petroleum Corporation: We recommend that an analysis of the following types of effects be included in the environmental consequences section of the RMP: Effects on opportunities to explore for, lease and develop oil and gas resources resulting from restrictive surface management decisions. The application and viability of reasonable mitigation. Limit the study to any residual effects that may be present after standard lease terms and conditions have been imposed. For example, a two-month occupancy restriction can be imposed under standard terms and conditions of a lease for purposes of protecting critical habitat (43 CFR 3101). Therefore, if the typical restriction used to protect calving areas is two months, no stipulation is needed, because the BLM has the authority to restrict an operator, if necessary, to protect such areas under the standard terms of the lease. A lease notice apprising the lessee that calving grounds exist on the lease should be sufficient.

Shay Westbrook—Yates Petroleum Corporation: We recommend that BLM use a method that incorporates historical data on what types of impacts have typically occurred in the area. It will be impossible to determine exactly how many miles of roads will be needed or how big a specific well pad may be until an Application for Permit to Drill (APD) is filed. Therefore, the agency should use a local average for these types of uses. Furthermore, the discussion of cumulative impacts related to possible development should include not only possible impacts of oil and gas activities but also the measures routinely employed to mitigate adverse effects. In addition, we recommend that BLM utilize a new approach for defining reasonably foreseeable development that addresses acceptable levels of surface disturbance rather than the number of wells in the planning area. This gives both BLM and industry needed flexibility in future development opportunities, such as drilling multiple wells from a single pad or taking into consideration wells that have been plugged and abandoned.

Shay Westbrook—Yates Petroleum Corporation: We urge BLM to recognize that the use of directional or horizontal drilling methods is based upon a number of factors that include geology, technological feasibility and economic viability. Even though this technology is viewed by many as a reasonable solution to surface disturbance concerns, BLM must recognize that these decisions can only be made with careful consideration to many other factors that influence a project's viability. Therefore, it would be inappropriate to impose across the Field Office a requirement that could render a well uneconomic or infeasible, particularly when existing leases do not require the use of alternative drilling techniques.

George Wuerthner: I am writing to urge you to give greater emphasis to wildlife and wilderness values on the Rock Springs District. In particular, I urge you to put Adobe Town, the Kinney Rim, and the Jack Morrow Hills off-limits to future oil and gas leasing and other types of heavy industry for the benefit of wildlife and public recreation.

George Wuerthner: Where industrialization is permitted, all efforts should be made to minimize the overall footprint of such activity. Horizontal drilling, seasonal closures, no surface occupancy, minimization of roads and transportation corridors, and so on should be standard operating procedures. And by all means, no industrial use of critical habitat.

MINERALS: SOLID

Erik Molvar—Biodiversity Conservation Alliance: Coal and Locatable Minerals (1.) Sensitive areas that will be classified "unsuitable" for coal leasing under SMCRA on a year-round basis, with no waiver available: Areas where there is overlap between three or more wildlife crucial winter ranges, crucial winter relief areas, and birthing areas; Other Areas of Critical Environmental Concern as outlined in the Western Heritage Alternative; areas within 2 miles of ferruginous hawks nests and within 1 mile of other active raptor nests; areas within 3 miles of active sage grouse leks, large prairie dog colonies and complexes, or those inhabited by BLM Sensitive Species such as black-footed ferret, burrowing owl, mountain plover, or swift fox; critical habitats of Endangered and Threatened species; and areas within the 100-year floodplain of permanent or intermittent streams or within 500 feet of natural water sources or riparian vegetation. (2.) Sensitive areas that will be withdrawn from locatable minerals entry on a year-round basis, with no waiver available: wildlife crucial winter ranges, crucial winter relief areas, and birthing areas; Other Areas of Critical Environmental Concern as outlined in the Western Heritage Alternative, areas within 1 mile of active raptor nests; areas within 3 miles of active sage grouse leks; large prairie dog colonies and complexes, or those inhabited by BLM Sensitive Species such as black-footed ferret, burrowing owl, mountain plover, or swift fox; critical habitats of Endangered and Threatened species; and areas within the 100-year floodplain of permanent or intermittent streams or within 500 feet of natural water sources or riparian vegetation.

Erik Molvar—Biodiversity Conservation Alliance: In light of the major impacts that mining and energy development have on other multiple use resources, including wildlife, recreation, watersheds, and wilderness, the new RMP must determine which areas are appropriate for this type of heavy industry, and for these areas, the new RMP must regulate mining and energy development in such a way that it becomes compatible with other resource values.

Erik Molvar—Biodiversity Conservation Alliance: Some raptors, notably golden eagles and ferruginous hawks, preferentially nest on "highwalls" created in open-pit mine sites, causing nests to be destroyed or relocated (sometimes resulting in nest abandonment) as coal and/or overburden is removed (Parrish et al., 1994). Thus, strip mining should not be allowed within one mile of raptor nests.

Doug Shaigec: A commercial party is interested in leasing Federal coal via the lease-by-application process to support development of a deep underground (greater than 3,000 foot depth) in-situ coal recovery process. In connection with and in advance of such leasing, an assessment of the suitability of the lands for coal leasing is required. The lands of interest (a subset of which would form the basis for the initial lease-by-application) are as follows (Federal portions thereof, as applicable): Twp 22N, 106W: Sections 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33, 34 Twp 22N, 107W: Section 1 Twp 23N, 106W: Sections 7, 16, 17, 18, 19, 20, 21, 28, 29, 30, 31, 32, 33, 34 Twp 23N, 107W: Sections 13, 24, 25, 36

PLANNING PROCESS

Joy Bannon—Wyoming Wildlife Federation: Question for you regarding the Jack Morrow Hills Coordinated Activity Plan: How will the RS RMP work with that document?

Joy Bannon—Wyoming Wildlife Federation: We encourage BLM to make the planning process for the RSFO a genuinely open one, and to approach the planning process with the goal of seeking solutions that will affirmatively seek to protect and restore sage grouse habitat, riparian areas, big game ranges, and other wildlife habitats, rather than merely viewing these resources as an impediment to increased energy extraction and livestock grazing levels. In addition, we urge BLM, to the extent it incorporates concepts of adaptive management into its land use plan, to utilize a rigorous and defensible definition of accessible management—one that incorporates clearly-defined targets, a guaranteed commitment of time and resources for necessary monitoring, and adequate provisions to allow for meaningful management changes if necessary to meet defined objectives.

Randy Bolles—Devon Energy Production Company, L.P.: Given its nature and purpose, the BLM should consider what decisions need to be made in the Rock Springs RMP. When preparing the Rock Springs RMP the BLM should not attempt to make site-specific decisions, but should develop only broad management goals and objectives. Further, the BLM should not expend unnecessary resources attempting to analyze the potential impacts of oil and gas development on a site-specific basis. Individual development projects will be analyzed on a case-by-case basis if and when operations are actually proposed. Based on the BLM's own policies and binding legal precedent, the BLM should ensure that the agency does not utilize the land use planning process to impose site-specific conditions of approval or unreasonably limit future management actions when revising the Rock Springs RMP.

Kent Connelly—Coalition of Local Governments: As cooperators, the Counties and Districts should be provided the opportunity for meaningful participation in the planning process as provided by law, regulation and guidelines. This participation should reflect the respective jurisdictions and special expertise of the Counties and the Districts, and provide for participation in issues affecting vegetation, agriculture, soil, water, land uses, and all other issues which the cooperators exercise jurisdiction or have special expertise. Each of the counties has jurisdiction over land use and zoning within the boundaries of the county, as well as law enforcement, transportation, public roads and trails, search and rescue and other emergency services. The respective conservation districts have extensive expertise and jurisdiction over land Page 2 of 18 CLG SCOPING COMMENTS FOR ROCK SPRINGS RMP REVISION and water and resource conservation and agriculture-related issues and enjoy broad planning and research authority under Wyoming law. Consistency with the County and District public land policy and resource-related plans and policies is considered at the onset and throughout plan development and not just in the final stages. The efforts by BLM to assure consistency must address policies, programs and plans of the respective local governments, to the extent practicable and consistent with federal law. 43 U.S.C. §1712(c)(9). The CLG members further request that they participate as part of the inter-disciplinary team in the planning process. This will facilitate the exchange of information and data.

Kent Connelly—Coalition of Local Governments: BLM decided to adopt a sage grouse RMP revision for the entire state by incorporating the Governor's Executive Order, as revised in 2010. The ever-growing scale of this effort both in terms of restrictions and additional land suggest that any change within the Rock Springs area should be postponed to the RMP. The BLM's sage grouse RMP process is a rushed affair with BLM failing to undertake the necessary analysis regarding lost mineral and energy development opportunity. Specifically, we understand BLM refuses to do a mineral potential report or a reasonable and foreseeable development project on the basis that there is no time. Similarly, BLM refuses to consider the cumulative impacts of other land management initiatives such as Wild Lands or pressure to develop renewable resources. Thus, the sage grouse RMP is making closure decisions that affect much,

if not most, of the planning area without the same level of analysis that would occur if it were part of an RMP process. If the RMP process simply adopts the Sage Grouse RMP, with its truncated analysis and omissions, then the public and the local governments will be denied the opportunities to understand both the costs and the lost resources. Such a situation does not conform to the objectives in FLPMA or NEPA and is hardly transparent.

Kent Connelly—Coalition of Local Governments: Definitions for terms such as "surface disturbance" and "disruptive activities" should be reconsidered and evaluated prior to development of alternatives to allow full understanding of the alternative and analysis of impacts. Definitions must be consistent with BLM regulations, science and data, and what is used in other resource areas. The term "disruptive activities" is so broadly defined in other resource management plans as to include hikers and livestock operators conducting the necessary activities to maintain a grazing allotment and to manage livestock. More importantly, no data supports excluding all human activities.

Kent Connelly—Coalition of Local Governments: Planning must be conducted without predetermined result or decision. The plan and its management actions should be outcome-based and provide for adaptive management rather than numerous prohibitions or restrictions. For example, if there is an established need to protect a particular resource, such as winter elk habitat, the RMP must provide for achieving the goal, and allow flexibility as to how the goal might be achieved within the context of that specific project or land use. The goal may be achieved through project design, avoidance or mitigation, as appropriate, and with monitoring to allow for evaluation and change. BLM will cooperate with joint monitoring.

Kent Connelly—Coalition of Local Governments: Recreation and wildlife must not be the dominant use driving the development of management actions in this plan. The Federal Land Policy and Management Act (FLPMA) recognizes six principal multiple uses: "domestic livestock grazing, fish and wildlife development and utilization, mineral exploration and production, rights-of-way, outdoor recreation, and timber production." 43 U.S.C. §1702(l). No one of the principal multiple uses should override the other. Vegetation condition and availability must be the basis for wildlife considerations, not population goals. Other public land uses must enjoy equal consideration in land use considerations.

Kent Connelly—Coalition of Local Governments: The plan should provide for the establishment of work groups made up of cooperators participating in development of the RMP that would assist the BLM in preparing NEPA documents associated with activity plans, modification to current plans and RMP implementation. Discussions of planning issues must not be held with individual cooperators without opportunity for inclusion of all cooperators. The planning process should be a group effort, and making "side deals" with one agency or the other destroys any sense of cooperation. All maps, reports or other such materials must be made available to the cooperators at the time the BLM is using them for the development of the RMP.

Kent Connelly—Coalition of Local Governments: The provisions of the Energy Policy and Conservation Act remain law and call for special management of parts of the planning area as a priority energy site. BLM has made other programmatic decisions that must shape the planning revision, including the Wind Energy Development Final Programmatic EIS and the Designation of Right-of-Way Corridors FEIS.

Nada Culver—The Wilderness Society: Making analyses available before issuing the draft RMP is another excellent way to increase public understanding of and participation in the planning process. The Kemmerer Field Office (Wyoming), for example, made their analysis of comments submitted on the Draft RMP and their ACEC evaluations public by posting them on their website months before they issued the Proposed RMP/FEIS1http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp.html.

Nada Culver—The Wilderness Society: Recommendation: The analyses discussed in these scoping comments must be completed prior to authorizing activities that will contribute to these impacts, such as oil and gas leasing, in order to determine whether and under what conditions they can be approved, such that significant impacts on the environment can be prevented. To the extent that the BLM defers any of the recommended analyses, we request that the RMP commit to a time period for completion and confirm that they will be completed prior to approval of contributing activities.

Nada Culver—The Wilderness Society: Recommendation: The BLM must uphold its responsibility to protect the abundant natural values present in the Rock Springs planning area when developing management alternatives in the Rock Springs RMP and evaluating their environmental consequences, as required by both FLPMA and NEPA, 42 U.S.C. § 4321 et seq.

Nada Culver—The Wilderness Society: Recommendation: The BLM should identify the agencies and tribal and local government entities granted cooperating agency status and post this information on the planning website.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP should analyze changes to management of the Jack Morrow Hills area. This area should be evaluated and managed holistically to preserve its many natural and cultural values while promoting and enhancing backcountry recreation experiences.

Nada Culver—The Wilderness Society: The BLM will need to ensure sufficient data is available in preparation of the various planning documents. In this context, we would also note that other BLM offices have made inventory data available to the public to assist in identifying new data needs and also made base data available for public use.

Nada Culver—The Wilderness Society: We encourage BLM to maximize public involvement in preparation of the Rock Springs Resource Management Plan (RMP). In addition to the public comment periods required by the National Environmental Policy Act (NEPA) and BLM's regulations, there are other opportunities throughout these planning processes for public involvement, which are used by many BLM offices.

Nada Culver—The Wilderness Society: We would also encourage the BLM to provide for public input into the management situation analysis and identification of planning issues, and on a preliminary range of alternatives prior to preparing the draft RMP—all of which are steps other BLM offices have taken to expand opportunities for public comment.

Nada Culver—The Wilderness Society: BLM scheduled regular days and times that the public could visit the field office and work with GIS/Recreation staff with real-time GIS and aerial photos. We encourage the Rock Springs Field Office to similarly make GIS staff and data available to assist the public with comments on the route inventory and other resources. This process should involve more than simply asking the public to identify routes they use and want to remain open, but should also include asking the public to identify routes that are damaging, redundant or infrequently used and should be closed and/or restored.

Jason Fearneyhough—Wyoming Department of Agriculture: Cooperation Active collaboration between local cooperators, state cooperators, and BLM officials is key to the successful planning and preparation of the RSFO RMP. We appreciate the training opportunities RSFO officials have provided cooperators and encourage a continuation of cooperating agency meetings throughout the planning process. Cooperator meetings allow for the discussion and open sharing of plan objectives, concerns, existing conditions, and desired conditions. Cooperator meetings also build confidence in and support for

the decisions made in the RMP. We request cooperator meetings occur as often as possible to help develop goals, objectives, management actions, alternatives, and Draft and Final EISs.

Jason Fearneyhough—Wyoming Department of Agriculture: The RMP should allow BLM officials and grazing permittees the opportunity to work cooperatively with flexibility to make the best case-by-case decisions in the best interests of affected natural resources and RSFO area citizens. Preliminary planning criteria should ensure BLM decisions are complementary to other planning jurisdictions and adjoining properties. These planning jurisdictions and adjoining properties include deeded lands, and decisions reflected in the RMP will critically impact ranchers and landowners' operations and planned livestock grazing management on these lands, especially in the checkerboard area of the RSFO. For this reason, BLM officials need to make every effort to continue to ensure decisions regarding this RMP are complementary to adjoining properties. This RMP and the RSFO officials need to actively coordinate with those responsible for making decisions on adjoining federal, state, and private lands.

Jason Fearneyhough—Wyoming Department of Agriculture: We encourage BLM officials to work with grazing permittees and agricultural producers to learn of their concerns and recommendations. Producers possess irreplaceable long-term, on-the-ground knowledge and should be utilized to their full advantage. They are particularly aware of the impacts this RMP will have on rangeland health, wildlife habitat, and livestock forage. They understand it is in their best interest to continue to serve as stewards of the lands and can offer environmentally and economically sound recommendations. Thus, we strongly recommend BLM officials aggressively address the concerns and recommendations of these stewards throughout the planning process and ensure grazing permittees receive all open house meeting dates/times and notices regarding the RMP revision.

Laura Koval—Fidelity Exploration and Production Company: BLM should explain in detail that the updated RMP will be a "programmatic" document. BLM should include an explanation of nature and use of "programmatic" documents and disclose that additional site-specific NEPA analyses will have to be conducted for individual Applications for Permit to Drill (APDs), Geographical Area Plans (GAPs), and Master Leasing Plans if applicable.

Nathon Maxon—Wyoming Outdoor Council: Best Management Practices: Prior to siting wind turbines, conduct at least two years of pre-construction wildlife surveys. Surveys should use scientifically sound, peer-reviewed research protocols to determine how wildlife use a proposed project area. Adjust siting and facility design based on the results of these studies to reduce potential impacts to the animals. Pre-construction surveys and consultation should include: Surveys for federally listed and state-protected animal and plant species, as well as for other species of concern. Surveys and consultation with the Wyoming Game and Fish Department to determine locations of greater sage-grouse, Columbian sharp-tailed grouse, and plains sharp-tailed grouse leks, nesting and brood-rearing habitat, and wintering areas. Research is needed to determine whether wind turbines adversely affect local sage-grouse populations. The Outdoor Council recommends that developers monitor radio-tagged sage-grouse for at least two years pre-construction and five years post-construction in proposed sites outside core sage-grouse areas. Daytime and nighttime avian and bat surveys during the spring and fall migration season to determine use of the proposed project area, and daytime avian and nighttime bat surveys during the breeding season for at least two years prior to construction. Surveys should follow science-based, peer-reviewed protocols. Avian surveys should include weekly point-counts. Surveys to determine active raptor nesting locations, flight pathways, foraging areas, and concentration areas. Consultation with the Wyoming Game and Fish Department to determine the locations of crucial ungulate habitats and migration corridors. Studies are needed to determine whether the presence of wind turbines on crucial seasonal ranges will adversely affect big game. Big game crucial ranges should be avoided when siting wind farms, but if crucial ranges are implicated we recommend that wind companies monitor radio-collared animals for at least two years pre- and post-construction. Projects should be designed to avoid and minimize potential conflicts with

wildlife resources. Site turbines and ancillary facilities to avoid: Fragmenting large contiguous tracts of wildlife habitat. Placing turbines on cultivated, disturbed, degraded, or already-fragmented lands is preferable. Avian concentration areas such as wildlife refuges, wetlands, riparian areas, reservoirs, roosts, leks, nesting colonies, staging areas, and landfills. Migratory pathways, corridors, and known daily movement flyways (e.g., between feeding and resting or breeding areas). Greater sage-grouse leks, sage-grouse nesting and brood-rearing habitat, and wintering areas. Turbines should not be constructed within five miles of greater sage-grouse leks. Columbian and plains sharp-tailed grouse leks, nesting and brood-rearing habitats, and wintering areas. Areas known to attract raptors—cliff and rim edges, cuts or passes in ridgelines, and sites that potentially have high concentrations of prey such as prairie dog towns. Turbines should be set at least 350 feet back from cliff and rim edges. They should be clustered rather than widely spaced, and rows should be oriented parallel to known bird movements rather than perpendicular to them. Areas near bat hibernacula, breeding and maternity colonies, migration corridors and flight paths between colonies, and feeding areas. Site turbines away from wetlands, riparian areas and woodlands to reduce potential bat collisions. High-use avian and bat areas identified in pre-construction surveys. Areas prone to fog, mist, low visibility, or low cloud ceilings. Place and configure meteorological towers to minimize impacts on birds: Research has shown that guyed meteorological towers may be more dangerous to birds than wind turbines, so un-guyed meteorological towers should be used whenever possible. Un-guyed met towers should be tubular, not lattice (lattice towers attract perching and nesting birds). If un-guyed met towers cannot be used, guy-wires should be fitted with recommended bird-deterrent devices, such as FireFly diverters. Do not place meteorological towers within two miles of sage-grouse, Columbian sharp-tailed grouse, or plains sharp-tailed grouse leks. Sage-grouse have an innate aversion to vertical structures. Design turbines and infrastructure to minimize hazards to wildlife: Use state-of-the art tubular, non-lattice turbines. Avoid placing external ladders and platforms on tubular towers that can be used by birds as perches or nest sites. Use no lighting on turbines unless required by Federal Aviation Administration regulations. For turbines that require lights for aviation safety, use a minimal number of simultaneously flashing white or red lights, unless otherwise requested by the FAA. Non-flashing red lights have been shown to attract night-migrating birds. If lights on auxiliary buildings are deemed necessary, they should be motion-activated and downcast to reduce light pollution and to prevent disturbing or attracting wildlife. Sodium vapor lights, widely used for streetlights and security lighting, should never be used at or near wind energy facilities because they have been shown to attract night-flying birds. Minimize roads and other infrastructure. Use existing roads whenever possible. Avoid constructing energy infrastructure during critical wildlife seasons such as breeding, nesting, and parturition. Reclaim areas disturbed during construction with native vegetation and prevent the spread of invasive plant species. Place and configure transmission lines to minimize impacts to birds: Bury lines whenever feasible, particularly in the vicinity of sage-grouse leks. When it is not feasible to bury the lines, keep them at least four miles away from the perimeter of occupied grouse leks. Studies have shown that, on average, 74 to 80 percent of female grouse nest within four miles of leks and that the impacts to leks from energy development are discernible out to a minimum of four miles. Transmission line configurations should comply with Avian Power Line Interaction Committee standards for minimizing raptor electrocutions. Outfit transmission lines within five miles of sage-grouse leks with perch deterrents to prevent raptor use if research shows that such deterrents are effective. Minimize fencing and ensure that any fencing is wildlife friendly: Avoid the use of fencing, which may disrupt wildlife movements, entangle wildlife, and increase bird fatalities. A chain-link fence can be used around operations and maintenance buildings. If fencing must be used or already exists, use a smooth bottom wire at least 18 inches off the ground to facilitate pronghorn movements. Use a smooth top wire or top rail to facilitate elk and deer movements, and to reduce avian fatalities. Spacing between the two top wires should be 12 inches to avoid entangling deer. Fences should be no higher than 40-42 inches. Use sage-grouse diverters on top wires within two miles of sage-grouse leks to prevent collisions with fence wires. Once operations have begun at a wind energy site, conduct post-construction avian and bat surveys using scientifically sound, peer-reviewed research protocols to monitor impacts and implement additional mitigation measures if necessary. Conduct surveys to determine fatality rates of birds and bats, including

carcass searches and associated scavenger removal trials (to determine how many dead birds and bats are removed from the site by scavengers) and searcher efficiency trials (to determine the proportion of dead birds actually found by searchers). Surveys should be conducted during the spring and fall migration periods and during the breeding season for at least two to three years post-construction. Reevaluate operations and maintenance: If post-construction surveys indicate unacceptable levels of avian or bat fatalities, take necessary actions to mitigate these impacts. For example, wind facilities can be shut down temporarily at night during peak migration periods to reduce collisions. Alternatively, individual turbines that appear to be particularly dangerous to birds and bats can be shut down temporarily. To avoid bat fatalities, wind turbines also may be programmed to begin operating at higher minimum wind speeds during bat migration periods. Research has shown that temporarily stopping wind turbines during low-wind conditions can dramatically reduce the number of bats killed at wind farms with a minimum loss of power output. Responsible wind energy companies are instituting many of these recommended BMPs for development on public lands, and some are voluntarily instituting selected BMPs on private land. The Wyoming Outdoor Council encourages all wind energy companies to fully adopt these BMPs on both public and private lands. Such compliance will ensure the best possible protection for Wyoming's irreplaceable natural resources and minimize conflicts as we develop this climate-friendly, renewable energy source.

Nathon Maxon—Wyoming Outdoor Council: BLM must ensure compatibility with the Sage-Grouse RMP Amendment and Visual Resource Management Classification Review. The BLM is engaged in at least two activities that must be viewed as part and parcel of the Rock Springs RMP revision. Those are the greater sage-grouse RMP amendments being pursued in five Field Offices, including the Rock Springs Field Office, and the review of visual resource management (VRM) classifications being made in the Rawlins and Rock Springs Field Offices. BLM must ensure that these additional planning efforts are fully reflected in this RMP revision. While we must await the results of these efforts before we will know what provisions are made, we believe the prescriptions and other management direction provided by the sage-grouse conservation and visual quality review efforts must be incorporated into the Rock Springs RMP. We think this should occur whether these efforts are fully completed when the RMP revision is completed or not. That is, even if these other planning efforts are not completed when the Rock Springs RMP Record of Decision is issued, the provisions of these other planning efforts should nevertheless be made part of the Rock Springs RMP. The Rock Springs RMP should make a provision for incorporation of these other planning efforts into the Rock Springs RMP by incorporating them by reference, without a need to await a further amendment of the Rock Springs RMP before these provisions are made part of it. Any such delay seems entirely unwarranted to us and we ask BLM to avoid any such further delay in incorporating the provisions of the sage-grouse and visual resource review efforts. The Wyoming Outdoor Council has been and will continue to be involved in the sage-grouse RMP amendment and the Rawlins and Rock Springs VRM review. Included in Exhibit 1 and incorporated by reference are the scoping comments that the Outdoor Council submitted regarding the sage-grouse RMP Amendment effort and the comments we submitted regarding the VRM review. We ask the BLM to fully consider these views as it engages in the Rock Springs RMP revision. In particular, to the extent the Rock Springs RMP makes provisions relative to sage-grouse and VRM designations that are separate from or independent from the other planning efforts--as it no doubt will--we ask that these earlier comments be considered as part of these scoping comments. For example, as noted in the sage-grouse RMP amendment scoping comments, BLM must ensure compliance with a variety of its sage-grouse Instruction Memoranda, and should consider the sagebrush ecosystem holistically by addressing the numerous other "sagebrush obligate" species that inhabit this ecosystem as it engages in sage-grouse conservation planning efforts. We believe these comments have relevance to this RMP revision as well as to the sage-grouse RMP amendment and therefore should be fully considered in this RMP revision. And as noted in our comments on the VRM review process, we believe that the Jack Morrow Hills, Adobe Town, and Little Mountain areas must have their visual quality protected. Furthermore, as we also discuss in those comments, the Upper Sweetwater/Wind River Front and Table/Cedar Mountain areas should also receive visual resource

protection. And importantly, in those comments we discuss the values that our members attach to these areas, and we ask the BLM to fully consider those personal values in the Rock Springs RMP revision.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. The final issue I raise is the maintenance of a formal process that will allow groups like the current task force to continue their cohesive process and remain in effect and effective moving forward. Significant progress has been gained by the group simply by sitting down and talking to one another about their individual concerns within the Little Mountain Area. It would be a shame to see this highly proactive, open process lost. In that regard, and consistent with federal law and policy, it appears a locally driven effort to maintain this dialogue would be helpful to the BLM, as well as all interested and affected parties. This group would like to continue to be available for further discussions that may be meaningful to the BLM and cooperating agencies during the RMP revision.

Jean Public: Since this is national land, saved by national taxpayers, your idea of trying to just let local profiteers speak on it shows a failure to understand and go by NEPA, which requires broad public outreach. You need to make sure you also invite animal protection groups to your meetings and national taxpayers who pay the taxes to support this land. Just having local meetings for local profiteers is trying to get away with robbery.

Russell A. Spencer—Azalea Oil Company, LLC: The BLM should ensure that it leaves itself sufficient flexibility to manage the public lands in light of ever changing resource demands, uses and technologies. The management objectives, goals and actions established in the revised Rock Springs RMP should be sufficiently flexible to manage the RMP for at least the next decade.

Lee Splett: Ensure that actions in the RMP don't just fill the status quo, but instead improve the way management of our resources is done. This would include better monitoring of development to ensure that stipulations set forth in the plan are being met and the least amount of environmental impact is occurring. This especially relates to oil and gas development.

Lee Splett: Public Involvement: A place at the table should be allowed the general public during the preparation of the various plan alternatives. This procedure has worked well in the past while preparing management plans for such areas as the Big Sandy River Corridor plan. I sit on the Big Sandy Working Group.

Larry Svoboda—EPA Region 8: In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for resources of concern. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries. The purpose of a cumulative impacts analysis is to assess: the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. Cumulative impacts analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts. In the analysis of present and reasonably foreseeable future actions, it is appropriate to examine anticipated activity trends in the study area, not just already approved "on-the-ground" projects. Examining activity trends in other areas with similar uses and contributory metrics can also be useful in this analysis. Also, the appropriate area of consideration and the time frame to use when assessing cumulative impacts will vary for each resource under consideration.

David Waterstreet—Wyoming DEQ/WQD: The WQD appreciates that the BLM will utilize recent RMPs, which were developed through collaborative efforts between the BLM and cooperating agencies in Wyoming, as a template which will be fine-tuned for the Rock Springs RMP. This should greatly

streamline the process since it avoids rehashing many issues which have already been addressed elsewhere in the state. Additionally, it is very important that the Analysis of the Management Situation document be prepared prior to alternative development, so that alternatives can be developed based on the specific situations and needs that exist in the Rock Springs Planning Area. We recognize that many BLM specialists in the Rock Springs Field Office may not have recently worked through the RMP development process in Wyoming. Therefore, we are more than willing to collaborate with those BLM specialists to help them understand WQD's position, and why certain goals, objectives and management actions regarding water quality were developed in other recent RMPs.

David Waterstreet—Wyoming DEQ/WQD: We believe clear communication and collaboration between the BLM and the WQD (and other cooperating agencies) throughout the EIS and RMP development process will not only improve the quality of the resulting RMP, but will also ensure the EIS process will proceed as efficiently as possible. Additionally, the RMP should stress the importance of collaboration during implementation of the RMP and during project level environmental analysis planning and implementation.

RECREATION

Pete Arambel: Recreation management should include educating the public to the laws in the state of Wyoming pertaining to vandalism, deeded land access and private property rights. It should be communicated that agricultural users of Federal land have intermingled deeded lands and livestock in most areas. They both should be respected. Literature should point out that improvements made by ranchers such as water and habitat enhancement contribute to the recreationist's overall experience.

Joy Bannon—Wyoming Wildlife Federation: Seek to find balanced solutions that ensure the area's great hunting and fishing is conserved for future generations. Conduct research with Wyoming's Department of Tourism, the Wyoming Game and Fish Department, and the State of Wyoming to consider the implications for loss of hunting and fishing to our economy.

Steven Brutger—Trout Unlimited: This RSFO is valued for its recreational values. We would like to see management decisions continue to allow for a wide range of recreational opportunities. A travel management plan should be created for the RSFO as part of this revision. This plan should address off-road vehicle use, in particular strategies for minimizing unauthorized use. In most cases we do not advocate for the closure of existing roads; however, there is adequate access in most areas and those areas that are devoid of roads should be maintained.

Kent Connelly—Coalition of Local Governments: Existing access should be maintained to support the demonstrated need for disbursed recreation opportunities. Any proposals to close access or reduce disbursed recreation must analyze and disclose the impacts to those physically impaired and the elderly. Opportunities for areas open to OHV use should be maintained and additional areas designated based on assessment of existing and future demand for OHV recreation. Any reductions must also disclose the impacts to other land ownerships, where OHV use may be concentrated when large areas are closed on public lands. Additionally, BLM should identify level of current users and demand for continued motorized vehicle access and off-road recreation. Any changes need to meet that current and future demand. Special Recreation Management Areas are designated to direct recreation management in a given area and must not be used as a basis to exclude or limit other resources or uses. Recreation Opportunity Spectrum is an inventory tool for recreation and must not be used as a basis to exclude or limit other resources or uses.

Nada Culver—The Wilderness Society: Recommendations: BLM should adopt a range of SRMAs and ERMAs and management prescriptions which provide adequate opportunities for non-motorized or quiet recreational experiences and are written to enhance the other values that ultimately contribute to the experiences of the area. BLM should use an aspirational approach which allows the agency to ensure that some level of existing disturbance does not disqualify areas which do provide a primitive experience from a decision to manage them to protect and enhance such qualities and provide this important experience.

Nada Culver—The Wilderness Society: Recommendations: In managing recreation on the lands of the Rock Springs Field Office, the RMP should ensure that quiet recreation opportunities are given sufficient attention and that management of motorized recreation, in general, is also designed to protect the experiences of other public land visitors. Comprehensive travel management planning, including landscape level planning and road density analysis, as well as compliance with land health standards, will also ensure healthy ecosystems that can support positive recreation experiences.

Nada Culver—The Wilderness Society: Recommendations: The BLM should set out clear standards for issuance of SRPs, to protect other uses and natural and cultural resources. Before issuing SRPs, the BLM must ensure that the agency has sufficient resources available to administer the permit and that the applicant can remedy any resultant damage to the public lands.

Nada Culver—The Wilderness Society: Recommendations: The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The USGS finds that dissatisfaction with recreational opportunities can "diminish public support for land-management programs" (Ouren 2007). We encourage BLM to utilize the SPreAD-GIS model to analyze and preserve the natural soundscape of the planning area, especially in special management areas managed for quiet use recreation.

Nada Culver—The Wilderness Society: The Moab Field Office completed a National Visitor Use Monitoring Program (NVUM) as a pilot project for visitor use monitoring on BLM lands. The NVUM for the Moab Field Office was developed through an interagency agreement with the Forest Service to be useful, in part, for making decisions during the planning process. The Rock Springs Field Office should conduct a similar survey in preparation of the RMP. If the Rock Springs Field Office also finds that quiet-use recreation is the most prevalent type of activity on public lands within the field office, it should ensure the RMP reflects that finding and adequately accommodates quiet users.

Nada Culver—The Wilderness Society: We recommend the Rock Springs Field Office conduct a soundscape analysis to guide formulation of intended user experiences.

A. Josef Greig: Personally, I would like to see the entire Red Desert preserved for recreation (except for uncontrolled ATV riding).

Robert Handelsman: I am writing to you regarding the management plan for the Red Desert. I believe that the primary use of Federal lands should be for "quiet" recreational pursuits such as hunting, fishing, hiking, camping, etc. and resource extraction allowed only in those rare instances where it does not adversely affect those "quiet" recreational pursuits. Once the land is given over to resource extraction, it is lost forever.

Michele and Robert Irwin: Recreation, including hunting, fishing, camping, rock hounding, ATVs, biking, etc. The RMP needs to be flexible enough to allow for many uses, but be able to step in quickly if cumulative impacts are too great. Areas under protective status with the current RMP should be protected under the revision—including cultural and historic resources. As with other uses, environmental impacts need to be minimized and mitigated.

Brian L. Kelly: The balance is already heavily favored to development. Where is the preservation for wildlife and future generations of hunters and recreationalists?

RENEWABLE ENERGY

Pete Arambel: Renewable energy is a vital part of our nation's future. Wind and solar power should be encouraged because they are both so abundant in our state.

Steven Brutger—Trout Unlimited: TU supports the development of renewable energy and associated transmission infrastructure that occurs in a responsible manner protecting fish and wildlife habitat. We recommend that the BLM analyzes transmission corridors within the RSFO and concentrate new development into existing corridors when possible. Siting of transmission lines should avoid critical fish and wildlife habitat when possible. Specific mitigation and monitoring plans should also be included in any development plan.

Kent Connelly—Coalition of Local Governments: As noted in the Introduction, BLM already issued two programmatic EIS's identifying wind energy potential and rights-of-way routes through the planning area. The RMP needs to address potential Page 8 of 18 CLG SCOPING COMMENTS FOR ROCK SPRINGS RMP REVISION areas and disclose the foregone resources due to other restrictions, e.g. sage grouse management or wildlife areas.

Kent Connelly—Coalition of Local Governments: BLM needs to give careful consideration about how sage grouse RMP revision will directly affect wind energy sites and proposed transmission lines.

Kreston Cross: I am very concerned about the potential wind energy projects that are proposed in the Rock Springs area. I am an avid outdoorsman and enjoy the many recreation opportunities that surround the area. I am completely against giving up these recreational opportunities in favor of wind development. I understand the multiple use land objective but how is wind development benefitting Wyoming, when all the power is being sold to the big city and it has minimal economic benefits to the county. Let alone it is decreasing other uses. Hunt areas south of Rock Springs offer trophy class mule deer, elk and pronghorn hunting opportunities. These areas are some of the best in Wyoming. Why would anyone want to sacrifice this for something that has little or no benefits for Wyoming and Sweetwater County? South of Rock Springs is a special area and deserves special attention. It would be a tragedy to lose these resources to a poor decision. It is one thing after another; if it's not wind, it's water, or oil/gas. Let's protect this area so future generations can enjoy this area the way I have. Who wants to recreate around wind mills and transmission lines? I know I don't. Let the big city solve their own problems instead of Wyoming bailing them out again!

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP should identify zones for all types of renewable energy development that prioritize high potential for energy development areas that contain degraded lands and are in close proximity to new transmission, while excluding sensitive conservation lands, such as citizen-proposed wilderness areas and ACECs. The RMP should also specifically preclude development outside the designated zones. Within the zones, the RMP should also set out prioritization criteria that direct development to degraded lands and identify other areas where development is more likely to lead to conflict, as well as setting out protective stipulations to safeguard other resources. We have provided a proposed "Sensitivity Based Prioritization for Development Areas within Renewable Energy Zones" (attached to these comments) to be used by the Rock Springs Field Office in implementing these recommendations. For off-site mitigation, BLM should provide for addressing a wide range of options to address the cumulative, far-reaching impact of renewable energy development (as set out in IM 2008-204) and should design a process to reach out to stakeholders and develop a set of conservation priorities to target in connection with off-site mitigation.

Nick Dobric: The BLM should also identify areas appropriate for renewable energy projects and transmission corridors and avoid big game winter habitat, calving grounds, important sage grouse areas

(Governors Core Habitat), Wilderness Study Areas (both agency and citizen identified), culturally rich sites, and Areas of Critical Environmental Concern (ACEC).

John Emmerich—Wyoming Game and Fish: We recommend that applications for and construction of commercial wind energy developments within designated greater sage-grouse core areas be prohibited within the RMP unless it can be demonstrated that no declines in sage grouse populations related to the project will occur.

John Hay, III—Rock Springs Grazing Association: Right-of-way applications for wind energy projects must be carefully reviewed and managed in the checkerboard. The BLM may accept applications from developers, but the private landowners have no obligation to do business with a specific BLM applicant. Confusion on this fact can lead to conflict and confusion for developers and BLM staff. If a developer has made arrangements with the private land owner prior to applying for BLM rights-of-way there is less confusion for BLM, proponent, and landowner.

Brian L. Kelly: Wind farms will permanently scar the higher elevations in the area which the wildlife depend on for habitat and ruin the views of the surrounding horizons.

Clair Kendall: Please do not allow any wind energy development south of Rock Springs, Sweeny Project excluded.

Fern Linton—Oregon California Trails Association: The development of wind energy and other energy projects impacts many sites with view shed issues along with ground disturbance. View shed need to be carefully defined and identified.

Dennis Luszcz: Renewable energy: development for wind energy in the area south of highway 28 within the area discussed above would have a severe impact on the scenic, historic and wildlife resources occurring there. I urge that it be discouraged in the RMP.

Spencer Martin—Wasatch Wind Intermountain, LLC.: As the RSFO develops a framework for managing BLM-administered lands over the RMP's planning horizon, please consider an increased emphasis on responsible wind energy development and related transmission projects that bring economic development to the region and diversify its energy mix. Wind energy development will likely continue to escalate during the planning horizon. Wasatch Wind Intermountain, LLC (WWI) is currently working with the RSFO on the National Environmental Policy Act (NEPA) process for our proposed Sweeney Ranch Wind Park and has a site testing and monitoring right-of-way grant for our Sweetwater Wind Park. In the future, we hope to propose additional sites for wind resource testing and, ultimately, development. Finding suitable wind energy sites is challenging. Multiple constraints affect the siting of such facilities. These constraints include having an economically viable wind resource that is located on a site outside of sensitive resource areas (e.g., wilderness study areas, sage-grouse core areas, big game crucial ranges, raptor concentration areas, cultural resource sites, sensitive viewshed areas), is constructible, and is in the vicinity of transmission lines with sufficient capacity to accommodate the energy produced. To encourage wind development over the course of the planning horizon, it is critical that the BLM retain staff members who are willing and able to work through these challenges with wind energy project proponents. WWI therefore recommends that the BLM continue to strongly support and staff the Renewable Energy Coordination Office and its efforts in the RSFO.

Nathon Maxon—Wyoming Outdoor Council: Lands That Should Be Excluded from Wind Energy Development: (1.) Lands that are statutorily precluded from development by federal, state, or local laws and regulations, or that are the subject of pending legislation. Examples include national parks and monuments; national wildlife refuges; designated wilderness areas; wilderness study areas and citizens'

proposed wilderness areas; rivers designated as wild and scenic; and other protected areas. (2.) Habitat occupied by animals or plants that are protected under the federal Endangered Species Act. (3.) Land designated by the Bureau of Land Management as areas of critical environmental concern and other BLM lands that have been identified for the protection of important wildlife resources, ecological features, and historical, paleontological, and archeological resources. (4.) Places designated as "important bird areas" by the National Audubon Society. (5.) Roadless areas inventoried by the U.S. Forest Service. (6.) BLM lands designated as visual resource management class I and class II areas and lands determined to have constraints on development by BLM resource management plans. (7.) State wildlife management areas and state parks. 8) Greater sage-grouse core breeding areas.

Nathon Maxon—Wyoming Outdoor Council: Once an area is determined to be suitable for wind energy development, the following steps should be taken to ensure that development proceeds responsibly: Pre-construction wildlife surveys should be conducted to determine the location of sensitive resources and the most appropriate placement of turbines. The siting of wind turbines and associated facilities should be adjusted and modified based on the results of pre-construction studies to minimize future impacts to wildlife. Turbines and infrastructure should be designed to reduce potential hazards to wildlife. Post-construction surveys should be conducted to determine actual impacts to wildlife, thereby enabling appropriate additional mitigation measures and improving future siting efforts

Nathon Maxon—Wyoming Outdoor Council: The Wyoming Outdoor Council supports the development of alternative renewable energy sources to reduce emissions that contribute to global climate change and air pollution. We recognize that Wyoming has high-quality wind resources that can provide the nation with a domestic source of renewable energy. We also recognize that industrial-scale wind farms have site-specific footprints that can harm Wyoming's wildlife and alter its iconic landscapes. The potential adverse impacts of wind energy development include collision-related fatalities of birds and bats, habitat destruction and fragmentation, increased human disturbance, and site avoidance by wildlife. We believe that some areas are inappropriate for wind development, just as some areas are not suitable for oil and gas development. Where it is appropriate, wind development must be "done right" by following best management practices (BMPs) to minimize the adverse effects of development on wildlife and wild lands. This brochure highlights these practices. We encourage developers and agencies to employ these BMPs, and we encourage the public to ask that wind energy companies follow these practices as part of a commitment to developing a renewable energy resource while minimizing environmental impacts.

Erik Molvar—Biodiversity Conservation Alliance: The Killpecker Dune Field traverses a significant portion of the Rock Springs Field Office to the north of Interstate 80, from the outskirts of Eden to the Rawlins Field Office boundary. This is the longest actively migrating dune field in North America, and provides habitat for the Endangered blowout penstemon farther east. This wildflower, listed as Threatened under the ESA, depends on moving dunes for its existence. The Killpecker Dunes corridor should be closed to wind energy development. It is obvious that wind farms, which convert wind energy to electricity, necessarily reduce wind velocities and/or change wind patterns in the localities where they are sited. According to Keith (2004), "Wind turbines can change wind patterns which can in turn change the climate by (slightly) altering amount of heat and moisture transported by the winds." And see Keith et al. (2004). BLM needs to undertake an analysis of the potentially significant impacts that such a reduction or change in the wind velocities that keep the Killpecker Dunes moving might be on the actively migrating nature of the dunes, the persistence of the unique plant and animal communities that depend on them, making the entire Killpecker Dunes corridor a wind power exclusion (or at least avoidance) area.

Erik Molvar—Biodiversity Conservation Alliance: Wind Power and Transmission: We support the responsible development of wind energy in the Rock Springs Field Office. BLM should implement the recommendations on siting and Best Practices outlined in BCA's report, "Wind Power in Wyoming: Doing It Smart from the Start," which we incorporate by reference into these scoping comments and have

attached. Attachment 5. Wind energy development, including the erection of anemometer stations to test for wind potential, should occur with full public notice and comment and full NEPA analysis, and this requirement should be codified in the forthcoming RMP. Areas proposed for wilderness in the planning area, including Adobe Town (with expansions), Kinney Rim North and South, Devils Playground, Sweetwater Canyon, Red Creek Badlands, Red Lake, East Sand Dunes, Buffalo Hump, Sand Dunes, Steamboat Mountain, Parnell Creek, the Big Empty, Joe Hay Rim, The Pinnacles, Honeycomb Buttes, Oregon Buttes, Oregon Buttes Badlands, and other lands with wilderness characteristics should be exclusion areas for wind energy development. In addition, lands within 5 miles of the Oregon/California/ Mormon, Cherokee, and Overland historic trails and other NHPA-eligible sites must be exclusion areas for wind energy development, because wind farms have particularly heavy impacts on the settings of historic properties. Areas managed for no leasing or No Surface Occupancy for oil and gas development should similarly be managed as exclusion areas for wind energy development. BLM must undertake a legally sufficient analysis of the direct and cumulative impacts of wind energy development that would allow a reasoned choice among alternatives in terms of avoidance and exclusion areas versus areas open to wind energy development. Wind energy development would likely be incompatible with VRM Class II and III management, with significant impacts occurring in cases where wind energy facilities are built in these areas. The agency needs to map important viewsheds and visual resource areas, for comparison against wind area avoidance and exclusion areas in order to put together a credible analysis of impacts of wind energy development on visual resources. In addition, BLM needs to take an adequate hard look at the impacts of wind energy development on wildlife. A comprehensive review of bird collision impacts of wind turbines is available to BLM online at http://www.west-inc.com/reports/avian_collisions.pdf. Attachment 6 at 5. A second literature review on these impacts is also available to BLM, as Appendix 7 to the USFWS recommendations. Attachment 9 at 49. Impacts include, in a general sense, habitat loss, degradation, fragmentation, and species placement from linear features (e.g., power lines, roads, and pipelines) and other permitted facilities (e.g., communication sites and wind turbines) would occur. ROW-approved actions for power lines, communication sites, and wind turbines would increase the potential of injury and death to bats, raptors, and other migratory birds as a result of collisions. Appropriate mitigation measures, such as adjusting the location, height, spacing, coloration, and density of development, and requiring unguyed meteorological towers, would avoid or reduce disturbance to migration routes, wintering areas, and other sensitive habitats.

Greg Probst—EnXco: As the Rock Springs Field Office develops a framework for managing BLM-administered lands over the next 15 to 20 years for multiple use and sustained yield, please consider an increased emphasis on responsible wind energy development and related transmission projects that bring economic development and diversify the region's energy mix. While wind development is likely to escalate during the planning horizon, most of that escalation will occur in the RMP's last 10 years. This lag is because limited available transmission capacity exists in Wyoming to interconnect new wind energy facilities, and few opportunities will exist to realize this robust wind resource until new high-voltage transmission infrastructure is built. Developing wind projects in the near term requires sites with existing transmission capacity. To encourage this potential near-term wind development, it is our recommendation that BLM continues to strongly support and staff the Renewable Energy Coordination Office's efforts in Rock Springs.

SOCIOECONOMICS

Dan and Janet W. Blair: As a conclusion to our requests, we call your attention to an economic study conducted in the early 2000s by researchers at the University of Saint Thomas in Minnesota, which revealed a striking parallel between acreage of protected lands and economic growth indicators for communities in the rural West. We offer this as a counter to the arguments that in this economic climate it is imperative that we continue to add jobs in the oil and gas industry. The study defined "protected lands" as wilderness, roadless areas, and national parks and monuments, and we believe the conclusions derived could well be applicable to the requests we and others have made that BLM create a Resource Management Plan for the Rock Springs Field Office that protects some of the lands, wildlife and recreational values under discussion: The study found that within 50 miles of the center of each western county that lacked a major metropolitan area, job growth, population growth, and personal income growth increased as protected lands increased. Counties with protected lands grew 5.7 times faster in terms of employment than counties without them and had higher paying jobs on average. The study also found no relationship between the amount of non-protected public lands near a county and economic growth indicators. (Lorah, P. and R. Southwick, 2003, Environmental Protection, Population Change, and Economic Development in the Rural Western United States, Population and Environment 24(3): 255-272.)

Kent Connelly—Coalition of Local Governments: Federal land ownership dominates the project area communities. Any land use plan needs to meet those needs and respect the custom and culture. BLM needs to appreciate the fact that Wyoming revenue policies do not directly transfer a share of mineral leasing and royalty revenues to local governments. Thus, federal land uses do not necessarily translate into revenues, even though the local governments must bear the brunt of the impacts. The Wyoming revenue policies also prescribe the allocation of funds for schools and municipal facilities. As a result, the lower population counties must rely on other options to raise the funds to provide necessary governmental services. Page 18 of 18 CLG SCOPING COMMENTS FOR ROCK SPRINGS RMP REVISION. The RMP must also fully and fairly disclose the foregone jobs and revenues for land use decisions that decrease or preclude the principal multiple uses of public lands, including domestic livestock grazing, rights-of-way and mineral development.

Nada Culver—The Wilderness Society: Recommendations: The RMP should evaluate non-market values provided by wildlands, per BLM's commitment set out in draft IM 2010-061. BLM should utilize the materials included in Appendix 2 to inform the RMP's socioeconomic analysis and ensure a full accounting of the costs and benefits of each of the alternatives. The values of protected lands and the costs associated with motorized recreation should be incorporated into economic analysis.

Jason Fearneyhough—Wyoming Department of Agriculture: Socioeconomics: Grazing on public lands represents a vital economic value to agricultural producers and to local communities within the state and needs to be fully analyzed in the RMP. We urge BLM officials to coordinate with the Department of Agricultural and Applied Economics located in the University of Wyoming College of Agriculture. They have conducted several studies regarding how policies impact agriculture throughout the state. The studies include the importance of Animal Unit Months (AUMs), the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. The RSFO RMP will directly affect the continuation of livestock grazing and other agricultural operations on federal and private lands within and adjacent to the planning area. Evaluations of economic impacts upon agriculture need to be included in the RMP revision process. In addition to economic impacts, livestock grazing represents irreplaceable environmental and social values. These values contribute valuable and irreplaceable wildlife habitat, open spaces, ranchland buffers between federal lands and developments, scenic vistas, visual beauty, and the traditional image and heritage of the historic rural landscapes of

Wyoming and the West. Losses of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be analyzed in the RMP.

Wyatt Hanks: As a nation, I think we are hurting ourselves by self-imposing restrictions which drive up the cost of energy production. The way I see it, each restriction brings the cost up an incremental amount that in turn, brings the economy down an incremental amount, incrementally lowering standard of living, which I think in the long run creates a negative effect on the environment (i.e., hard times leave less time and money to worry about environmental issues). I believe that whatever measures we can take to further industry and the economy will, in an indirect way, help the environment.

Liz Howell—Wyoming Wilderness Association: The BLM needs to assess equally the non-consumptive use of the RSRMP area in economic terms. The many multiple uses of camping, backpacking, horseback riding, bicycling, pleasure driving, hiking, nature study, and wildlife viewing are all examples of non-consumptive (non-hunting) uses that people enjoy in the Greater Red Desert. Off-Highway Vehicle (OHV) riding is also considered non-consumptive, but usually kept separate in economic studies. While the pictures and stories people take from these experiences are well-known, the economic benefits usually go unnoticed. In the Wyoming Game and Fish Department's (WGFD) 2006 Annual Report it was estimated, based on the 2005 expenditures adjusted for inflation, that $295,398,065 was spent in Wyoming for 3,924,000 recreation days. Dividing these numbers shows that on average non-consumptive recreation users spent $75.28 per day in 2005. Looking at the portion of the Jack Morrow Hills (JMH), it was reported in their JMH Coordinated Activity Plan that OHV expenditures were $124.70 per visitor day (JMH/CAP FEIS, p. A16-13). Since this estimate is from 2004 it can be safely assumed that the value is higher today. In the JMH/CAP the number of non-consumptive days came from 19% of the total Green River Extensive Recreation Area days found in the Recreation Management Information System (JMH/CAP DEIS, p. 306). The BLM estimated a 2% increase in recreation days during the planning period, with 48,700 non-consumptive recreation days for 1998. Of this number 31, 950 (65.6%) were residents and 16,750 (34.4%) were nonresidents (JMH/CAP DEIS, p. 306). Using the 2% rate of increase to adjust for current use, the value of resident non-consumptive recreation days for 2006 would be 37,062 while it would be 19,430 for non-residents, thus totaling 56,492 days. Calculating expenditures using the WGFD 2005 value results is $4,252,717 of non-consumptive recreation expenditures in the JMH analysis area, not including OHV use. The BLM's 2006 Recreation Management Information System (RMIS) gives details on visitor days for specific areas; for the northern Red Desert there were two areas reported. The White Mountain Petroglyphs had 3,966 visitor days and using the 2005 WGFD average expenditures demonstrates that visitors spent $298,560. For the Oregon/Mormon Trail South Pass Summit Area there were 3,132 visitor days valued at $235,777. This means for just these two areas alone, $534,337 was spent by non-consumptive users. The Sand Dunes Specialized Sport Site is a popular OHV riding area that generates a large visitor turnout and expenditures. The RMIS reported that there were 156,580 visitor days, which using the agency's estimated value of $124.70, results in $19,525,526 total expenditures. Keep in mind this does not include OHV riding in other areas of the northern Red Desert. In conclusion, the non-hunting recreation in the northern Red Desert is a place where people spend millions of dollars each year. For 2006, people spent $23,778,243 with $4,252,717 coming from recreation other than OHV riding. When conducting an environmental analysis, the BLM is required to examine the socioeconomic impacts that may occur within the study area. Oftentimes the benefits of extractable resources become the main focus, while the value of recreation gets less and sometimes dubious study. For instance, in the JMH/CAP FEIS, the BLM only considered the activities of non-residents (p. A16-9). Yet their previous analysis showed that 65.2% of visitors were Wyoming residents. Even more, the BLM never adequately analyzed the economic impacts to recreation from mineral development. For example, in discussing Area 3 (the first place drilling would occur) they stated that well completion rates would be high resulting in "… a substantial increase in surface disturbance,

noise, and visual intrusion over a relatively short period of time, potentially increasing short term impacts on the recreation experience" (JMH/CAP FEIS, pp. 4-107).

T.G. Jones—Wyoming Wilderness: I took my children across the Red Desert with trailer and water in tow seven years ago. We had a spectacular time in a spectacular land they will never forget. We returned two years ago to the destruction of the pipe hauling trucks, a "graveyard" of abandoned equipment, and could not even recognize the areas we had camped via recorded GPS coordinates on the previous adventure; again the children will never forget. Horizontal drilling from existing sites is possible, maybe expensive, yet the cost to our Great State which rightly claims "Wyoming IS What America Was" has no monetary value to the generations that follow. Humans will adapt to higher prices for energy. The greed of the energy barons and the upper 5% of our citizens is boundless. The attitude of not caring about anything after you are dead, and only striving for immediate profit was hamstrung by Teddy and it is time to cut the other leg.

Brian L. Kelly: I am deeply concerned that the multiple use of public lands is heavily favored toward energy development and mineral extraction. The residents in this area are held hostage to jobs from these various industries to provide sustenance for our communities. I feel that their overwhelming influence of both the public and the government is an unfair advantage to the concerns of the average citizen. The Rock Springs Management area already delivers coal, natural gas, oil, trona, electricity, water and many other commodities to the world. Currently the assault to are open spaces is wind power, oil shale and carbon sequestration. These are potentially huge industries that are trying to force their way into already over-industrialized areas of southwestern Wyoming. With little to no population, the people are powerless to these land-grabbing industries who only see the financial benefits of over development.

Erik Molvar—Biodiversity Conservation Alliance: While oil and gas development is often viewed as a benefit to local economies, the fact of the matter is that major increases in production create a "boom and bust" cycle that provides a brief period of prosperity accompanied by major stresses to local infrastructure and governments, followed by economic depression. The coal bed methane boom in the Powder River Basin between 1999 and 2000 brought with it major impacts on the community and its infrastructure: a 12-15% increase in truck traffic, a 26% increase in traffic violations, a 40% increase in emergency calls, coupled with a depletion in county workers who left for higher-paying jobs in the coal bed methane fields (Morton et al. 2002). A bust always follows the boom, leaving local governments holding the bag for major capital investments put in during the height of activity, with major declines in revenues, jobs, and real estate values.

The Rev. Warren Murphy: Finally, I would like to mention that I am a clergyman and spiritual leader who is concerned about the declining areas of our state that are accessible for SOLITUDE. This is so important to spiritual awareness in a culture that prizes action and development. People need places of spiritual retreat and the Red Desert and other areas of the RMP process are some of the premier places for still finding this in Wyoming. I know that there are many Native American spiritual and sacred places located throughout the area and there should be great caution in making sure none of these areas are disturbed. Many are known but it is my understanding that there are probably many more that are unknown and the RMP should take into consideration their future analysis. Religious and spiritual consideration should also be taken into account in the RMP process.

Michael N. Rudoff: I am dead-set against the imposition of user fees for using public lands that already belong to me as a citizen of this country, state, and county, and would support the abolition of such fees already in place in such places as Flaming Gorge, and the doing away of such additional "taxes" as the presently required ORV stickers for all ATVs, dirt bikes, etc. In short, for the most part, keep the lands as they are multi-use lands that can be enjoyed by the vast majority of Wyoming residents.

Heather Smith—EOG Resources, Inc.: As the BLM considers revisions to the Rock Springs RMP, EOG encourages the agency to avoid actions that could impair oil and gas development and could subsequently harm local economies.

Cheryl Sorenson—Petroleum Association of Wyoming: Socioeconomic considerations and benefits from oil and gas activities must be addressed in the DEIS: It is important for BLM to adequately address the positive impacts of oil and gas development, such as local jobs, tax payments and royalty revenue. As BLM is aware, well-paying jobs and the significant revenue derived from oil and gas development create substantial economic benefits for both the state and local communities. These positive aspects of oil and gas activities must be fully explored and detailed in the RMP, as such a comprehensive analysis of the socioeconomic benefits of oil and gas development activities in the area should be included in the review. A chart representing costs of administering the mineral program and industry's financial contributions to local, state and federal treasuries would also be appropriate. The effects on oil and gas opportunities from surface management is only tied to—not limited to—economic impacts. Access to public lands for purposes of exploring for and producing oil and gas resources must be considered a separate issue from economic impacts. It must be explained how surface management constrains the availability of public lands for leasing, exploration and potential development. Moreover, compliance with the various leasing laws that require all lands to be evaluated for lease is an access issue that has nothing to do with economics. A comprehensive analysis of the socioeconomic benefits of oil and gas development activities in the area should be an essential component of the review. A chart representing costs of administering the mineral program and industry's financial contributions to local, state and federal treasuries would also be appropriate.

Russell A. Spencer—Azalea Oil Company, LLC: Restrictions on oil and gas activity should not be overly restrictive. Oil and gas development is the primary employment and source of tax revenue for the State of Wyoming.

Russell A. Spencer—Azalea Oil Company, LLC: The BLM should not prescribe any management action that will impede or limit oil and gas production and thereby: (a) decrease federal, state and local tax revenue; (b) decrease employment; and (c) adversely impact local economies.

Brian Voigt—Crown Energy Partners, LLC: As part of the planning process, the BLM should ensure that all the economic benefits of natural gas development is included in the socioeconomic analysis. Natural gas development is part of a diversified economy of SW Wyoming. The industry contributes significantly to the local, and state economy, providing millions of dollars each year in royalties, bonuses, ad valorem and severance taxes, besides other benefits of direct capital investment to the local economy along with creating (and sustaining) high-paying local jobs.

Shay Westbrook—Yates Petroleum Corporation: A comprehensive analysis of the socioeconomic benefits of oil and gas development activities in the area should be an essential component of the review and must be addressed in the Draft RMP/EIS. A chart representing costs of administering the mineral program and industry's financial contributions to local, state and federal treasuries would also be appropriate.

SOILS

Kent Connelly—Coalition of Local Governments: The plan must provide that the BLM will coordinate all soil-related management activities with the appropriate Natural Resources Conservation Service offices and affected conservation districts. BLM should collaborate with state, local, federal agencies and conservation districts to complete Level III soil surveys.

Erik Molvar—Biodiversity Conservation Alliance: Physical disturbance, through damaging soil crusts, has been shown to cause long-term nutrient losses from soils in arid regions (Evans and Belnap 1999). Soil disturbances can reduce soil nitrogen fixation by 30-100%, and thus surface disturbances may have serious impacts on nitrogen fixation in cold desert ecosystems (Belnap 1996). Thus, the widespread destruction of biological soil crusts can have long-term impacts on soil and plant productivity, and the BLM must incorporate into its land management directives standards which prevent these impacts from occurring.

Erik Molvar—Biodiversity Conservation Alliance: Soil, Water, and Air Management Soils: (1.) The RMP should map the occurrence of Biological Soil Crusts throughout the planning area and evaluate current and future impacts to this important soil resource from livestock grazing, seismic exploration, and other types of development. (2.) Develop and implement long-term monitoring protocols for the restoration of soil crust communities. Adapt and refine monitoring protocols, in particular the Biological Soil Crust Stability Index, for evaluation of existing BSC condition. When used in conjunction with corresponding measures of landscape stability, biotic integrity, and watershed function, the BSCSI can be used to help determine the relative health of grassland and sagebrush communities. (3.) Identify, map and protect from human-related disturbances any remaining areas (refugia) where BSC represent 50% or more of the total ground cover (these are unlikely to represent more than 0.1% of the GRDA).

Erik Molvar—Biodiversity Conservation Alliance: The BLM should protect a series of relatively undisturbed relict sites as a rangeland reference (after Belnap et al. 2001) and use these to measure departure of rangeland health from an undisturbed state. We recommend standardized survey methods (after Rosentreter and Eldridge 2002) be used to monitor biological soil crusts at least at a coarse scale within each grazing allotment, with permanent fixed-area plots established and exclosure areas providing controls at each site.

Erik Molvar—Biodiversity Conservation Alliance: The sensitivity of biological soil crusts to off-road vehicle travel make it imperative that the BLM restrict vehicles to designated roads and trails.

Erik Molvar—Biodiversity Conservation Alliance: We urge the BLM to adopt standards that minimize soil compaction in the first place, rather than putting the emphasis on reclaiming damaged soils after the fact.

SPECIAL DESIGNATIONS

Joy Bannon—Wyoming Wildlife Federation: Since FLPMA requires that the designation and protection of ACECs must be given priority in land use planning, it is critical that all alternatives developed in the EIS do so. 43 U.S.C. § 1712(c)(3). Pursuant to FLPMA, the RMP "shall include the general management practices and uses, including mitigating measures, identified to protect designated ACEC[s]." 43 C.F.R. § 1610.7- 2(b). The requirement to "prevent irreparable damage" imposes a greater protective standard than either the non-impairment standard in the definition of multiple-use or the prevention of unnecessary or undue degradation standard applicable to all actions. Compare 43 U.S.C. § 1702(a) with 43 U.S.C. §§ 1702(c), 1732(b). Because of the fragile resources at risk on the lands described above and the higher degree of protection required, BLM should apply the following restrictions on surface disturbance within the ACECs in the RMP: All ACEC lands should be withdrawn from the operation of the General Mining Law. Chaining and other mechanical methods of vegetation manipulation should be prohibited. NSO stipulations should be required for all ACECs. ACEC lands should be unsuitable for coal production. ORV use should be limited to a few designated-route ACECs. Greater Little Mountain Area: WWF and NWF define this area as: The Greater Little Mountain Coalition's (Coalition) area of interest is defined as east of Flaming Gorge Reservoir, west of Highway 430, north of the Wyoming border and south of Pretty Water Creek and the Sage Creek Road (see map A). This area totals 522,236 acres. Recreation and wildlife are vitally important in Sweetwater County, Wyoming. The Little Mountain area is a place that has particular significance and value. The juniper woodland area of Little Mountain is a popular recreation spot for our members, particularly those in southwestern Wyoming. They utilize the backcountry recreational opportunities, drive off highway vehicles, watch wildlife, hunt and fish, and enjoy the scenery. This rugged Wyoming landscape supports abundant wildlife populations, sensitive species, and ample recreation opportunities. For generations the Greater Little Mountain Area has served as a hunting, fishing and "recreational paradise for Wyoming sportsmen. While relatively unknown to many, this area is truly one of the West's hidden gems. However, with about 50% of the area leased for oil and gas development, the future of this great landscape is uncertain as it faces pressure from energy development. If chasing native trout on small streams in remote country is your passion this area holds excellent conservation populations of native Colorado River Cutthroat Trout (CRCT). For serious hunters drawing a deer or elk tag in the Little Mountain area is a once-in-a-lifetime opportunity to hunt some of the best populations of trophy Mule Deer and Elk in Wyoming. Overall, the region possesses large intact tracts of prime fish and wildlife habitat that translates into opportunity for hunters and anglers. The Little Mountain area is a biologically rich landscape with a plethora of terrestrial and aquatic species. Some of the species include: moose, elk, mule deer, antelope, sage grouse, mountain lion, black bear, several raptors, midget faded rattlesnake, and waterfowl. A number of sensitive species depend on juniper woodland, aspen and sagebrush habitats within the area, such as the Greater sage-grouse. In recent weeks, the BLM has nominated the Greater Little Mountain Area eligible for a Master Leasing Plan (MLP) as described in the Secretary of Interior Ken Salazar's Instruction Memorandum 2010-117. WWF is able to assist the BLM in seeing the MLP through to fruition as the plan incorporates positive concepts that should reduce management conflicts, provide certainty for the energy industry along with sportsmen, and enable the public to have involvement in a long-term management plan. We are available to have conversations, to sit at the table through a decision-making process, and provide positive and thoughtful ideas and solutions. Given the importance of Master Leasing Plans in the rational and balanced development of public lands energy resources, it is critical that the content and timing of the RMP revision avoid any actions that would prejudice the meaningful completion of the MLP process. Recommendations for the GLMA: The Red Creek ACEC (Area of Critical Environmental Concern) portion of the Greater Red Creek ACEC and the Red Creek Wilderness Study Area (WSA) will remain off limits for energy leasing and development. The Currant Creek ACEC of the Greater Red Creek ACEC remains No Surface Occupancy (NSO). (Map B) No new leasing in Currant Creek ACEC and Sage Creek ACEC and retire expiring leases. The regions of Miller Mountain,

Potter Mountain, Elk Butte, and the Salt Wells Creek drainage above Titsworth Gap should be reviewed for increased protections, due to crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer. Avoid big game birthing areas, including moose that inhabit this southern portion of the Greater Little Mountain Area. Jack Morrow Hills WWF and NWF members use the Jack Morrow Hills (JMH) area for hunting, fishing, camping, photography and simply to relax. The JMH has a myriad of special values with crucial habitats for mule deer, antelope and a rare desert elk herd, including migration areas, crucial winter range, and parturition areas. In fact, some have argued that the desert elk herd within the JMH is the largest in the United States. The Greatest sage grouse also has a stronghold in this area, although declines have been seen in recent years. Other wildlife species include the pygmy rabbit, ferruginous hawks, burrowing owl and the mountain plover. The JMH is also a nationally significant historic resource, as it is home to the Oregon and California Trails, Mormon Pioneer Trail, the Pony Express Trail, and South Pass historic trail. It also contains a remarkable collection of areas critically important to Native Americans, including respected places and sacred sites, and the culturally important Indian Gap Trail and Indian Gap area. Even more ancient evidence of human use and occupation abounds, including the Finley and Krmpotich sites and the Eden-Farson site. The landscape holds unique geologic features such as the Boars Tusk and the Honeycomb Buttes. Seven wilderness study areas exist here along with Areas of Critical Environmental Concern (ACEC) have been recognized and a number of other areas have been afforded special management status to protect their wild values. In December of 2000, Secretary of the Interior Bruce Babbitt recognized the magnificence and special value in the Jack Morrow Hills. In the memorandum to the BLM, the Secretary noted he was “greatly impressed by the unique and outstanding natural resources contained in the planning area.” While he acknowledged the oil and gas resource, he pointed out that “the presence of finite mineral resources should not deprive future generations of the natural and aesthetic wonders of the Great Divide Basin.” The Jack Morrow Hills Coordinated Activity Plan (CAP) laid out implementation, monitoring and evaluation plans that may not have been completed or even started. For instance, baseline and indicator data were to be collected for monitoring. Mitigation measures were to have been developed for plan decisions and management actions that could be evaluated to determine if objectives were being met. WWF and NWF would be interested in reading these plans along with the inclusion of any updated and relevant scientific data for wildlife and vegetative species within the JMH CAP. Adobe Town: The Adobe Town area encompasses townships within the Rock Springs and Rawlins field offices and is located southeast of Rock Springs in Wyoming’s Greater Red Desert. Adobe Town is a Wilderness Study Area and should remain so unless Congress elevates its designation to Wilderness. These wilderness quality landscapes are valuable for wildlife, recreation, and visual enjoyment. Antelope, mule deer and elk migrate through Adobe Town and the area is important as crucial range for these big game. This habitat has the vegetation, cover, and contiguous landscape that wildlife need for survival. A variety of other wildlife inhabit this landscape such as burrowing owls, golden eagles, prairie falcons, Greater sage grouse, mountain plovers and ferruginous hawks. Critical Stream Corridors, such as Bitter Creek and the Little Snake River, are found within Adobe Town. As one of the driest areas in Wyoming, these soils are fragile and can easily erode. Development or disturbance near these sensitive soils and stream corridors will degrade the quality and reduce its viability for wildlife.

Diane Brower: I have spent time in Adobe Town and the adjoining areas. These areas are stunningly beautiful, geologically unique, and have remarkable solitude. I’ve seen the impact of oil and gas exploration and development in the area just south of Adobe Town. It would be a desecration to allow this area to be impacted by oil and gas development and exploration. Such a huge percentage of BLM land is already being developed for extraction—please, please keep Adobe Town as it is!

Leila Bruno: I think you know this, but I’ll say it anyway: Our children are the ones who will benefit or lose based on what we do now. So I am asking you to protect and preserve all the Wilderness Study Areas we have right now, so that we have them for future generations. I have been into all of these areas over the years—amazing! The Red Desert revision should conserve all of the following AT LEAST: Oregon

Buttes (including Whitehorse Creek), Honeycomb Buttes (including Harris Slough), the Big Empty (including Joe Hay Rim and Bush Creek), The Pinnacles (including South Pinnacles WSA, Alkali Draw WSA, and Parnell Creek), East Sand Dunes (including Alkali Basin), Red Lake, and Buffalo Hump/Sand Dunes. In the southern portion, Red Creek Badlands, Adobe Town, Twin Buttes and Devil's Playground. And because the Jack Morrow Hills area offers more solitude and wildlife opportunities than most, I believe this large landscape deserves a bigger vision for protection—an alternative that would include a National Conservation Landscape designation for the Red Desert. In the future, people from all over the world will be attracted to this kind of open, pristine wild area—but only if we do our job of protecting it right now.

Kent Connelly—Coalition of Local Governments: In the late fall of 2010, CLG members were invited to meetings to discuss management of the Little Mountain area with the objective that common ground could be identified. Some common areas were in fact discussed and generally agreed to. More significantly, however, there was no agreement as to the size and extent of Little Mountain. Some portions of the general area may merit special management, such as for recreation. But the entire bounds of what is often called Little Mountain does not. Any broad designation would be very disruptive for CLG members and the land uses and land ownerships already there. There was also no consensus to support mineral closures or withdrawals. There is significant activity and potential within the general area. Any such closure would have long-term adverse impacts. While there was agreement to support the ranching community, it is also important that the group expressed support for full grazing preference. The group also discussed the importance of BLM lands being included within the scope of the State's efforts to develop a candidate conservation agreement with assurances (CCAA) for the sage grouse. The landownership patterns in Little Mountain as well as elsewhere within the planning project area makes BLM's full participation in the process necessary. Otherwise landowners would have no incentive to participate in a CCAA.

Kent Connelly—Coalition of Local Governments: No river segment should be included in the National Wild and Scenic River System unless: Water is present and flowing at all times and that there is adequate unappropriated water available to sustain management of identified outstanding and remarkable values. The water-related value is considered outstandingly remarkable within the region, and that the rationale and justification for the conclusion are disclosed. BLM fully disclaims in writing any interest in water rights with respect to the subject segment. It is clearly demonstrated that including segment in the NWSR system will not prevent, reduce, impair, or otherwise interfere with the state and its citizens' enjoyment of complete and exclusive water rights in and to rivers of the state as determined by the laws of the state, nor interfere with or impair local, state, regional, or interstate water compacts to which the State or County is a party. Page 17 of 18 CLG SCOPING COMMENTS FOR ROCK SPRINGS RMP REVISION. The rationale and justification for the proposed addition, including a comparison with protections offered by other management tools, is clearly analyzed within the multiple-use mandate, and the results disclosed. - It is clearly demonstrated that BLM does not intend to use such a designation to improperly impose Class I or II Visual Resource Management prescriptions. It is clearly demonstrated that the proposed addition will not adversely impact the local economy agricultural and industrial operations, outdoor recreation, water rights, water quality, water resource planning, and access to and across river corridors in both upstream and downstream directions of the proposed river segment. The WSRA study for the plan must conform to all of the analytical procedures and criteria found in the DM 8351 – Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management. Specifically, there should be a separate eligibility determination with public comment. Eligibility must include potential impacts of the exercise of existing water rights on river segment. The second phase, suitability, should fully analyze suitability based on all of the manual criteria and also provide for public comment.

Kent Connelly—Coalition of Local Governments: Proposed Areas of Critical Environmental Concern (ACEC) must satisfy all of the requirements of FLPMA, 43 U.S.C. § 1702(a). In addition, the RMP

should include documentation of irreparable threat, and the resources to be protected are regionally or nationally significant. Specifically, BLM cannot support a sage grouse habitat ACEC when similar habitat is found throughout Wyoming and the adjoining states of Colorado, Utah and Idaho. All existing ACECs must be analyzed to determine the need to retain the ACEC classification. ACECs must be re-analyzed and proposed. ACEC analysis must reflect the following criteria: The proposed ACEC must be limited in geographic size and scope to the minimum necessary to specifically protect and prevent irreparable damage to values that are objectively shown to be relevant and important or to protect human life or safety from natural hazards. The proposed ACEC designation cannot be supported solely to change on the ground conditions or protect visual resources, when reclamation will address the impacts. ACECs are limited to cases when the resource faces irreparable harm, not just temporary impact. The proposed ACEC designation and protection must not be applied redundantly over existing protections provided pursuant to FLPMA rules and policies. The proposed ACEC designation cannot be a substitute for a wilderness suitability determination, nor offered as a means to manage a non-WSA for wilderness characteristics.

Joshua W.D. Coursey—Greater Little Mountain Coalition: The regions of Miller Mountain, Potter Mountain, Elk Butte, and the Salt Wells Creek drainage above Titsworth Gap should be reviewed for increased protections, due to crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer.

Joshua W.D. Coursey—Greater Little Mountain Coalition: The following actions should be reviewed and considered when developing draft alternatives for the RMP. (1.) The Red Creek ACEC (Area of Critical Environmental Concern) portion of the Greater Red Creek ACEC and the Red Creek Wilderness Study Area (WSA) will remain off limits for energy leasing and development. (2.) The Currant Creek ACEC of the Greater Red Creek ACEC remains No Surface Occupancy (NSO). (3.) No new leasing of contiguous blocks of land, identified in December 1, 2009 letter from BLM to Governor Freudenthal, that fall within the Currant Creek ACEC and Sage Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs Field Office should address the Adobe Town area on a landscape scale and consider a range of designations to protect the wilderness, geologic, wildlife, recreation, and archaeological values of Adobe Town while providing for quality recreational experiences. The Rock Springs RMP should evaluate and adopt a range of special management areas and management prescriptions, including layering designations, which provide adequate opportunities for quiet recreation experiences and enhance the other values that ultimately contribute to the experiences of the area.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP must carefully study all potentially eligible stream segments, adopt requirements to ensure eligible and suitable rivers are protected pending decisions on their designation, and ensure any designated rivers and river corridors are managed to preserve their values.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs RMP must evaluate a range of alternatives for ACEC designations that protect sensitive and important resources in the planning area. The RMP should put robust management prescriptions in place to ensure adequate protection for the resources that ACECs are designated to protect. The RMP should retain all existing ACECs and expand them or improve management prescriptions where necessary.

Nada Culver—The Wilderness Society: The Center for Native Ecosystems previously submitted ACEC nominations to the Rock Springs Field Office, which have not been evaluated to our knowledge. We

recommend BLM review this information (attached to these comments) and give due consideration to protecting the species and areas addressed in CNE's proposals.

Nada Culver—The Wilderness Society: We also recommend that BLM complete its assessment of Monument Valley to confirm that this area satisfies the criteria for ACEC designation. BLM was unable to make this determination in the Green River RMP because it lacked a "systematic inventory" of the area's values.

Gary Dean: Designate the Sweetwater River as a Wild and Scenic River.

Gary Dean: I support the protection and designation of the following Areas of Critical Environmental Concern (ACEC): Pine Springs, Red Creek, Sage Creek, Currant Creek, Natural Corrals, White Mt. Petroglyphs, Greater Sand Dunes, Cedar Canyon, Steamboat Mt., Oregon Buttes.

Gary Dean: One of the alternatives should include a National Conservation Landscape designation for the Red Desert (Jack Morrow Hills area). This massive and impressive landscape deserves a bigger vision for protection.

Nick Dobric: As the Red Desert has been debated for decades for conservation designation, the BLM should develop an alternative that includes a National Conservation Area.

Nick Dobric: The Little Mountain Area should have conservation alternatives developed for the area to preserve its rich hunting and fishing areas. This includes withdrawal areas and buy-back options that are similar to the Wyoming Range Legacy Act.

Rita Donham: Boar's Tusk Area would make a wonderful "natural reserve" because of its totemic presence and proximity to the dunes and spring-like water features and wildlife.

John Emmerich—Wyoming Game and Fish: At a minimum, maintain the language in the existing RMP that provides protective management objectives and emphasizes achieving and maintaining healthy aquatic and terrestrial wildlife habitat for the entire Greater Red Creek ACEC including the Red Creek, Currant Creek, and Sage Creek watersheds. We also recommend the Sugarloaf Basin SMA be included in the Greater Red Creek ACEC boundaries due to its important wildlife habitat values and ecosystem connectivity to the remaining ACEC area.

John Emmerich—Wyoming Game and Fish: Sweetwater county anglers, hunters, wildlife enthusiasts, and statewide conservation groups have resoundingly expressed their desire for more stringent habitat protection measures for the greater Little Mountain area in an effort to prevent industrialized levels of energy-related development from occurring and negatively impacting this wildlife-rich landscape. As advocates for Wyoming's terrestrial and aquatic wildlife resources, and our constituents, we request that the BLM adopt more stringent management actions and objectives than what exists in the current RMP for federal lands within the Little Mountain Ecosystem (LME) (defined as the area east of Flaming Gorge Reservoir, west of Highway 430, north of the Utah/Colorado state line, and south of the BLM/Private checkerboard land boundary) in order to sustain healthy watersheds, wildlife populations/habitat, ecosystem integrity, and open space for future generations to enjoy.

John Emmerich—Wyoming Game and Fish: We recommend consideration of permanent withdrawal of oil & gas leases (including oil shale leases) as they become suspended and available, and avoiding wind energy development on federal lands within the boundaries of the LME and Jack Morrow Hills/Steamboat area, and other ACECs, as management strategies for sustaining healthy watersheds, wildlife populations/habitat, ecosystem integrity, and open space for future generations to enjoy.

John Emmerich—Wyoming Game and Fish: We recommend incorporating the existing Sugarloaf Basin SMA and Pine Mountain SMA into the Greater Red Creek ACEC designation. These areas support valuable wildlife resources that afford greater habitat protection than what exists under the current RMP, and is necessary to maintain ecosystem integrity for the LME.

John Emmerich—Wyoming Game and Fish: We recommend no net loss of existing wilderness study areas (WSAs), areas of critical environmental concern (ACECs), or special management areas (SMAs) within the field office boundary. Given increasing industrial impacts to this landscape, protecting these areas is crucial to maintain and enhance wildlife populations, habitats, and wildlife-related recreation.

Pete Gosar: In that spirit, I would hope that the lands of the South Wind River Front would continue to enjoy the special management designation where it now exists and that this protection would be extended to all of the BLM lands from the Big Sandy to South Pass. This area is a critical elk wintering ground, has spectacular scenic value, and should be passed to future generations in as wild a condition as it now exists. Big game ungulate wintering grounds are critical to survival and one needs to look no further than the mule deer herds on the Jonah Field to understand the tragic results of wholesale disruption to wintering big game.

Wyatt Hanks: Leave the so-called "sensitive environmental areas" such as in Adobe Town and the Jack Morrow Hills open for drilling and other industry (I absolutely love these places but drilling won't ruin them. Continue managing for multiple use with the current emphasis on industry. Continue studying environmental impact and including findings in decisions but not driving decisions (i.e., where best to put a pipeline, not IF there will even be a pipeline).

Liz Howell—Wyoming Wilderness Association: The GREATER RED DESERT NATIONAL CONSERVATION AREA DESIGNATION: It's time the BLM recognize the importance of the entire Red Desert with its present and future values as the Red Desert (including Adobe Town) National Conservation Area. There are no more excuses to delay, dismiss or deride this big effort to protect this area. For decades, the Red Desert has been center of numerous articles, scientific studies, books and historic articles. The values for humanity are undeniable and the BLM needs to step up and draft into this plan the beginning of the process to designate the Jack Morrow Hills area and Adobe Town area as the Greater Red Desert NCA. To begin this process, WWA urges the BLM to: Review past history of efforts to protect area and current events of the past 100 years of protection efforts. Understand the importance and evaluation process of bringing forward an NCA concept for Greater Red Desert. Identify all those who have advocated for the Greater Red Desert NCA in the past. Support for an NCA is all about being conservation-minded and sustained energy development for Wyoming. Wyoming citizens and all American have the privilege to hunt trophy antelope and elk, play on ORVs, hunt for gems and minerals, horse/llama/goat-pack and stroll through the Red Desert. It would be tragic to lose those experiences and see this unique landscape turned into another industrial complex. There are identified diverse and unique ecosystems and cultural areas within the Red Desert such as the Oregon Buttes-Steamboat Mountain country and Adobe Town, and all the ACECs. Identify the protection for Native American cultural and sacred places. WWA urges the protection of sensitive and critical areas in the Red Desert from oil, gas and coal bed methane development. These areas represent a mere fraction of the acres available to industry.

Dennis Luszcz: Special Designations: The area south of Highway 28 and east of highway contains a large acreage of lands designated under various wilderness study ACEC, and other natural resource and historic considerations. As such it comprises a landscape of state and national significance. The area is not as heavily roaded as many BLM parcels in Wyoming yet access for recreation and other uses is not unduly restrictive. It would make sense, therefore, to consolidate this area into a designation that would provide greater protection for the scenic, recreational, historic and wildlife values contained therein.

Nathon Maxon—Wyoming Outdoor Council: The greater Cedar Mountain area deserves special management and this area provides an opportunity to meet the obligations established by BLM's Wild Lands policy. BLM lands west of Flaming Gorge reservoir and south of the checkerboard within the Rock Springs Field Office, referred to here as the Cedar Mountain area, host an array of important resources that deserve protection. This area is important for sage-grouse, wintering ungulates, hosts rare endemic plants, has high scenic quality, is important for recreation, and retains much of its wilderness value. Notably, this area is also home to superb paleontological resources because of the exposed portions of the Bridger formation found there. Included within Exhibit 1 is an "Assessment of Paleontological Resources of the Greater Cedar Mountain Area, a map of paleontological resources, and an overview of the Potential Fossil Yield Classification system, all of which highlight the tremendous paleontological resources of the Cedar Mountain area. Because of these many values, we believe that this area should be designated as an ACEC. In addition, six specific areas should be managed as wild lands to protect their wilderness values. GIS shape files that delineate this proposed ACEC (CedarMountainProposedACEC.shp) as well as each of the six wild areas can be found on Exhibit 1, the attached CD. Polygons for the six wild areas were digitized by tracing along existing improved roads using GIS and the 2009 National Agriculture Imagery Program (NAIP) satellite data. Field visits to five of the six areas were conducted to ground truth the polygons. One area, Cedar Mountain North, was inaccessible due to winter conditions and prevented a field visit to ground truth the polygon. Polygons were then altered to exclude areas with structures that were not visible in GIS using the NAIP data. We believe these areas meet the criteria for designation as Wild Lands established by Secretarial Order No. 3310 as well as BLM's implementing Manual Sections 6301, 6302, and 6303. Accordingly, these areas meet the requirements to be recognized as Wild Lands, and as such BLM should seek to ensure the wilderness qualities of these lands are not impaired, as called for by the Secretarial Order and the Manual Sections. Moreover, there is little doubt but that the Cedar Mountain area meets the relevance and importance criteria for ACEC designation, and under the Federal Land Policy and Management Act (FLPMA), BLM is to give "priority" to ACEC designation during land use planning. 42 U.S.C. § 1712(c)(3). Accordingly the Cedar Mountain area should be designated an ACEC.

Nathon Maxon—Wyoming Outdoor Council: BLM Should Develop a Coordinated Activity Plan for the Adobe Town Area. The BLM has developed a special Coordinated Activity Plan (CAP) for the Jack Morrow Hills area in the northern part of the Rock Springs Field Office. A similar plan and management structure should be developed for the Adobe Town Area. We believe that the heightened management focus that a CAP represents is what is needed to ensure the Adobe Town area receives the enhanced management attention it clearly warrants. When BLM deferred fluid minerals leasing decisions in the Jack Morrow Hills area pending development of a CAP, an important reason for this was the need to find "mutually compatible" uses for the area "that provide for the important resource concerns in the area." Green River Resource Management Plan, Record of Decision at 4. These important resources included crucial big game habitats, air and water quality, scenic quality, vegetative cover and soil stability, recreational activities, livestock grazing and range improvements, mineral development, and "other important resource concerns." Id. at 5. The intention was for the CAP to "provide more specific management direction for the activity planning area [than the overarching RMP] to prevent or address potential conflicts among or resulting from these uses." Id. While the CAP was being developed, "premature commitments" that would allow development or disturbance were avoided so as to protect the recognized sensitive resources. Id. We believe that similar concerns apply to the Adobe Town area, and consequently development of a CAP for this area would be appropriate as a companion to this RMP. The Adobe Town area clearly has extraordinary recreational opportunities, wilderness values, scenic quality, and "other important resource concerns." Consequently, just as in the Jack Morrow Hills, development of a CAP would be appropriate and useful. Such a "mini RMP" would be a very useful way to ensure the best possible management is applied in this area that has become of significant public concern. Were a CAP to be developed, the Jack Morrow Hills CAP could provide a useful model that would help guide development of useful and appropriate management direction. For example, the Adobe Town CAP could

provide for an implementation strategy, monitoring plan, and evaluation process that would allow for the determination of "what, where, when, and under what conditions" surface disturbing and disruptive activities would be permitted, accompanied by a list of sensitive resources that would be protected and a management prescription for surface use activities. See Jack Morrow Hills Coordinated Activity Plan/Green River Resource Management Plan Amendment Record of Decision at 6, 8 (making these provisions). Management Areas that define the relative resource values in each area and future oil and gas leasing activities could be defined. If the Jack Morrow Hills model were followed, this would mean that Area 1 would be available for future leasing, Area 2 open for leasing but under heightened restrictions, and Area 3 would be closed to future leasing. See id. at 49-51, Map B. Special provisions could be made for wildlife protection, id. at 41-48, and development of a CAP would allow an opportunity for designation of new Areas of Critical Environmental Concern (ACEC) or other special management areas, just as occurred under the Jack Morrow Hills CAP. Even if the BLM does not believe the CPWs qualify as wilderness, they might well warrant other special management attention, and the State of Wyoming has clearly already laid the groundwork for designation of the Adobe Town Rare or Uncommon Area as a BLM ACEC. And as was discussed above, a Master Leasing Plan could be developed for this area, which would allow for better management of oil and gas activities in the area. These and many other management provisions could be made pursuant to a CAP, which would allow the special character of the Adobe Town area to be fully recognized and appropriately managed.

Nathon Maxon—Wyoming Outdoor Council: Even if the BLM were to not develop a CAP for the Adobe Town area, it is clear that special management attention is needed and warranted for this area. Following are suggested management prescriptions for the Adobe Town area that could be made part of a CAP, or could be incorporated directly into the revised Rock Springs RMP. As noted above, and as indicated in the accompanying map, the Adobe Town area is a Wyoming Outdoor Council-recognized Heritage Landscape, and it is our goal to see these areas fully protected. The State of Wyoming's goals in Rare or Uncommon Areas are to prevent non-coal mining operations (which do not include oil and gas operations) that "irreparably harm, destroy, or materially impair" the "particular historical, archeological, wildlife, surface geological, botanical, or scenic value" attributes in a rare or uncommon area. WS § 35-11-406(m)(iv). As stated by the Wyoming Environmental Quality Council when it made the Rare or Uncommon designation for Adobe Town, "The area as designated is very unique and spectacular and should be protected as very rare or uncommon." Under federal law, the 85,000 acre Adobe Town WSA must be managed by the BLM "in a manner so as not to impair the suitability of such areas for preservation as wilderness, subject, however, to the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in which the same was being conducted on October 21, 1976." 43 U.S.C. § 1782(c). The Wyoming Outdoor Council proposes that the Adobe Town area be managed under the newly revised Rock Springs RMP in accordance with these principles. That said, the Wyoming Outdoor Council recognizes that particularly in the northern part of the Adobe Town area much of the land is in the "railroad checkerboard," meaning that intervening sections of land are under private ownership and management, with most of the remaining sections under federal ownership and control. It is our view that the management plan for the Adobe Town area in the RMP should recognize and respect the goals and interests of private land owners in the checkerboard area, particularly the goals and interests of the Rock Springs Grazing Association (RSGA), which is a large landowner in this area.

With these points in mind, the Wyoming Outdoor Council proposes the following management direction for the Adobe Town area in the revised Rock Springs RMP: (1.) There should be no new oil and gas leasing on federal lands in this area. If there are issues or concerns regarding drainage of federal oil and gas, especially in the checkerboard area, we believe those issues should first be addressed through alternative mechanisms provided for in BLM regulations, such as execution of agreements for compensation from owners of interests in the producing wells, entering into communitization agreements, or approving unitization agreements or communitization agreements that provide for payment of royalties on production attributable to unleased mineral resources. See 43 C.F.R. §§ 3162.2-2(b)-(d). Furthermore,

as proposed in our letter to the BLM dated July 12, 2010, which is enclosed herewith as Exhibit 4, a Master Leasing Plan should be developed for the Adobe Town area pursuant to BLM instruction memorandum 2010-117. (2.) Federal lands in the Adobe Town area should be withdrawn from "hard rock" mining location, and from consideration for oil shale development. (3.) The Adobe Town area should be designated as unavailable for wind energy development on federal lands. To the extent wind energy development is proposed or pursued on RSGA lands or other private lands, Federal lands in the vicinity should be a high priority for sale or exchange (see below). (4.) To address areas that have already been leased for oil and gas development, the RMP should identify areas where drilling to access oil and gas will be most acceptable from an environmental protection standpoint, and limit drilling to from within these designated areas (i.e., directional drilling would allow for accessing minerals outside of the designated drilling areas). No drilling should be permitted to occur in sage-grouse core areas, areas identified by citizens for wilderness protection, crucial big game habitats, or in critical watersheds unless there is no other option that would allow the lease holder to exercise their development rights without drilling in these areas, and in these cases the drilling should be directed to the least sensitive areas possible and done in the most protective manner possible. (5.) The BLM should fully abide by sage-grouse instruction memoranda issued by the BLM Wyoming State Office, and with the Executive Order issued by the Governor of Wyoming. (6.) Existing grazing practices on federal lands should be allowed to continue, however, the RMP should ensure that compliance with the BLM's grazing standards and guidelines is monitored and any changes to grazing practices needed to comply with the standards and guidelines (and fundamentals of rangeland health) that are needed on federal public lands--not RSGA lands--are made. (7.) The RMP should identify and designate appropriate access routes into this area that might be made available for roads or road upgrades, seeking to limit the impacts of roads on federal lands to extent possible. Access could be needed for development of existing oil and gas leases and for access to RSGA grazing properties, but BLM should seek to limit the number and impact of these roads to the extent possible so as to maintain the natural values of the Adobe Town area, while permitting legally required access and access needed by the RSGA for productive use of its properties. The RMP should seek to achieve agreement with the RSGA for access across its properties to federal properties as is needed, but again the RMP should seek to minimize the impacts of roads. (8.) The RMP should identify lands, particularly in the checkerboard area, where exchanges and purchases might be pursued, particularly with the RSGA, so as to achieve greater levels of unified land management and ownership. Any such activities should be done on a willing-buyer willing-seller basis. (9.) The RMP should fully consider expansion of the Adobe Town WSA. Moreover, the BLM should again fully consider the wilderness characteristics of the Adobe Town, Kinney Rim South and Kinney Rim North CPWs. We believe this is fully consistent with BLM's new Wild Lands policy and BLM's implementing Manual provisions. These areas should be designated as Wild Lands pursuant to Secretarial Order 3310. But even if the BLM cannot or will not provide for increased recognition of wilderness values in these areas, to the extent there are any wilderness quality values present in these areas--such as opportunities for solitude or primitive and unconfined recreation--the BLM should seek to maintain those values in the RMP. (10.) The Adobe Town area should be a right of way exclusion area except to the extent there is a need to provide rights of ways to allow for the use of RSGA lands, or other private lands. (11.) Existing ORV use should be allowed to continue on designated routes. (12.) In areas that have not been leased, the Adobe Town area should be designated a Class II visual resource management (VRM) area, and as leases expire these areas should also be designated VRM Class II (the Adobe Town WSA should of course be designated VRM Class I). In areas that have been leased, the minimum VRM classification should be VRM Class III. In recognition of the fact that the Rawlins Field Office has designated a portion of the Adobe Town area as the "Adobe Town Dispersed Recreation Use Area" we would propose that this area receive a similar designation in the Rock Springs RMP so as to maintain cohesiveness among RMPs: the area should be called the Rock Springs Adobe Town Dispersed Recreation Use Area. However, as indicated above, we do not believe the management provisions made in the Rawlins RMP should be replicated in the Rock Springs RMP. While we believe the dispersed recreation management goals with their associated opportunity classes specified in the Rawlins RMP could be replicated in the Rock Springs

RMP, we believe the limited focus on recreation activities in the Rawlins RMP is too narrow. See Approved Rawlins Resource Management Plan Record of Decision at A37-1 to -3. As indicated, we believe a more holistic specification of management direction is needed in the Adobe Town area. In particular, statements such as this in the Rawlins RMP should not be replicated in the Rock Springs RMP: "Identification of the area as a Dispersed Recreation Management Area will not limit mineral leasing or development nor will it sunset existing leases." Id. at A37-1. And this: "Leased areas that are developed will experience, in some cases, severe deviation from the desired [recreation opportunity spectrum] over an extended period of time." Id. We believe a plan that does not actively seek to minimize the impacts of oil and gas development on existing leases and limits future leasing is of little value for this area if the goal is to protect the natural values of this remarkable area, which we believe must be the fundamental, overarching goal. Consequently, we believe the BLM Rock Springs Field Office should adopt a considerably more prescriptive plan for management of development in the Adobe Town area in its RMP than is reflected in the Rawlins RMP.

Nathon Maxon—Wyoming Outdoor Council: In addition to expansion of the NLCS, the BLM in the Rock Springs RMP revision should ensure that existing components of the NLCS continue to receive appropriate management. Existing components of the NLCS include WSAs and historic and scenic trails. Trails include the Cherokee Trails, Overland Trail, stage and freight trails, and the Oregon, California, Mormon, and Pony Express complex of trails. WSAs include Twin Buttes, Devil's Playground, Red Creek Badlands, and Adobe Town, as well as several WSAs in the Jack Morrow Hills area. The BLM should ensure that all of these areas continue to receive management that qualifies them for the NLCS, and in the case of WSAs meets BLM's interim wilderness protection policies.

Nathon Maxon—Wyoming Outdoor Council: One of the more significant landscapes in the Rock Springs Field Office is the Adobe Town area, an expanse of undeveloped wild lands southeast of Rock Springs. Management of this area is shared with the Rawlins Field Office, which has designated the Adobe Town Dispersed Use Area in its revised RMP. The Adobe Town area as recognized by the Wyoming Outdoor Council is shown in the map 12 that is included within Exhibit 1. As can be seen, this area includes the Adobe Town WSA, but in addition also includes the Adobe Town citizens' proposed wilderness (CPW), Kinney Rim North CPW, Kinney Rim South CPW, and the state-recognized Adobe Town Rare or Uncommon Area. The Adobe Town area is a Heritage Landscape recognized by the Wyoming Outdoor Council. See http://wyomin.qoutdoorcouncil.or.q/html/whatwedo/public lands/heritage landscapes.shtml. We believe this entire area should receive special management attention in the revised Rock Springs RMP, and below will propose such management. In fact we were invited by BLM Rock Springs Field Office personnel to propose management for the Adobe Town area, and the below comments are offered in response to that request. There can be little doubt but that the Adobe Town area warrants special management focus. Even if the BLM does not believe the CPWs have wilderness characteristics, there simply is no denying that there has been heightened public attention and concern focused on this area. And certainly this heightened interest is not focused just on the Adobe Town WSA--the area of concern is undoubtedly broader. Examples of the increased interest in this area include the following: BLM has offered a number of oil and gas lease parcels in the CPWs recently, and those offerings have invariably been protested by citizens, and in at least one instance (the December 2009 lease sale), the Secretary of the Interior intervened in the lease sale so as to ensure protection of wilderness qualities in this area received adequate consideration. Removal of a lease parcel in this area also occurred with respect to the May 2011 lease sale. The Sweetwater County Commission has passed resolutions asking for protection of this area, particularly from oil and gas development. The State Environmental Quality Council designation of this area as Rare or Uncommon stands as testament to the heightened public interest in this area. This spring, the Wyoming Association of Churches will be holding a weeklong Red Desert Week that will include various celebrations and services in a number of communities and in June it will hold the Red Desert Rendezvous in Rock Springs which will include field trips to the Adobe Town area. The Wyoming Outdoor Council in collaboration with the BLM Rawlins

Field Office held its "Ride the Red" citizens bike ride near this area in 2010, in the Powder Rim area. These are just some examples of the significant public interest focused on the Adobe Town area. Given this interest, affording this area special management attention is appropriate.

Nathon Maxon—Wyoming Outdoor Council: The BLM should consider the wilderness qualities of all citizen proposed wilderness (CPW) areas that are found in the Rock Springs Field Office and recognize the wilderness qualities of these lands as appropriate. These CPWs contain important wilderness qualities that should receive protection under the Wild Lands policy. Special designations from the 1997 Green River RMP should be retained. As indicated, the Record of Decision and Green River Resource Management Plan and the Record of Decision and Jack Morrow Hills Coordinated Activity Plan/Green River Resource Management Plan Amendment recognize and designate a number of special management areas in the Rock Springs Field Office. Among many others these include the Wind River Front Special Recreation Management Area, Cedar Canyon ACEC, Greater Red Creek ACEC, Pine Spring ACEC, the Currant Creek and Sage Creek Watersheds, the Monument Valley Management Area, the Red Desert Watershed, and the Steamboat Mountain ACEC, as well as a number of WSAs. We urge the BLM to maintain these special designations in the revised RMP, and where ACEC status was only in a proposed or postponed status under the prior RMP, to make these areas ACECs under the revised RMP. We think there can be little doubt that these areas warrant continued special management. The Cedar Canyon ACEC contains important cultural values, scenic resources, and wildlife habitat. The Wind River Front Special Recreation Management Area contains important visual values, is a high quality recreation area, contains significant plant communities, and has important wildlife habitat. The Sugarloaf Basin provides important opportunities for dispersed recreation, important wildlife values, and significant watershed values. The Monument Valley Management Area has important geological, cultural, watershed, scenic, paleontological, and cultural values. Much the same could be said about every specially designated area in the current RMP and Jack Morrow Hills CAP. Areas like the South Pass Historic Landscape, Oregon Buttes, and the Boars Tusk are beyond dispute as to their special values. Thus, these special designations should at a minimum be maintained in the revised RMP, and in many instances the special management focus should be enhanced by designating the area an ACEC. We think there is little doubt that areas such as Monument Valley, which was not designated an ACEC in the last RMP revision but rather was postponed from ACEC designation, possess the requisite relevance and importance criteria.

Nathon Maxon—Wyoming Outdoor Council: The National Landscape Conservation System (NLCS) has become a priority management focus of the BLM. This importance and elevated focus was emphasized by the NLCS conference BLM held in Las Vegas in mid-November 2010, at which time Secretary of the Interior Salazar issued a Secretarial Order elevating the NLCS to the highest levels of BLM management consideration (BLM was ordered to establish a new NLCS directorate). BLM Director Bob Abbey repeatedly made it clear that the NLCS system is a priority for BLM at this meeting. Given this heightened emphasis, we believe the BLM should prioritize expansion of the NLCS as a component of revision of the Rock Springs RMP, and a desired outcome of the new plan. As is stated on BLM's NLCS website, the NLCS works to conserve the essential fabric of the West. NLCS areas are part of an active, vibrant landscape where people live, work and play. They offer exceptional opportunities for recreation, solitude, wildlife viewing, exploring history, scientific research, and a wide range of traditional uses. These are places that spark the imagination. Their spacious beauty has drawn people to the West for generations. The NLCS sustains for the future—and for everyone—these remarkable landscapes of the American spirit. We believe there are places in the Rock Springs Field Office that live up to this poetic description of the value and importance of these lands, and thus we ask the BLM to fully consider expansion of the NLCS as a component of the Rock Springs RMP revision. Unfortunately, Wyoming is somewhat handicapped when it comes to NLCS expansion. Wyoming, of course, cannot have new National Monuments designated by the President without Congressional approval. National Monuments are obviously one means to expand the NLCS that might be desirable in the Rock Springs Field Office, but this mechanism is not likely to be available. Nevertheless, we do believe there are at

least two means by which the NLCS might be expanded in the Rock Springs Field Office, and we encourage the BLM to consider these in the Rock Springs RMP revision.

Nathon Maxon—Wyoming Outdoor Council: Under the Record of Decision and Green River Resource Management Plan, the BLM has designated the Monument Valley Management Area, which is in the Adobe Town area. The management direction for this area could provide a useful framework for the entire Adobe Town area as we have defined it here. The management objective for this area is to protect wildlife, geologic, cultural, watershed, scenic, paleontological, and cultural resources, all of which are prominent in this area. We believe these values are clearly prominent throughout the Adobe Town area as we have defined it here, and thus the management objective for the Monument Valley Management Area could be applied more widely. We especially believe that management as a Class II visual resource environment should be extended to the entire Adobe Town area, as is provided for in Monument Valley. The other management prescriptions for the Monument Valley area could also be extended to the entire Adobe Town area, although, as discussed elsewhere, we do not support making the area available for mineral development, such as through oil and gas leasing.

Nathon Maxon—Wyoming Outdoor Council: We wish to draw special attention to three of the currently designated special management areas. The first is the Red Desert Watershed Management Area. This remarkable area north of the railroad checkerboard is a scenic desert wonderland. We particularly wish to draw your attention to the following. One of the management objectives for this area is to "provide large areas of unobstructed views for the enjoyment of scenic qualities." Record of Decision and Green River Resource Management Plan at 39. This is a remarkable statement and we strongly support it. In essence this represents a vision for this area and we urge the BLM to maintain this direction. It can contribute to maintaining the essence of the Red Desert: unobstructed wide open spaces in one of America's most magnificent desert landscapes. We must not lose that. And, we would urge the BLM to consider applying this same management direction to other areas in the Rock Springs Field Office--including our Heritage Landscapes--because we feel they too would benefit from a management objective of maintaining "large areas of unobstructed views for the enjoyment of scenic qualities." Second, the Wind River Front Special Recreation Management Area must be recognized as a vitally important link in a landscape scale land protection network. It should be recognized that this remarkable, remote, dispersed recreation area does not stand alone, it is intimately tied to two other very large protected areas. This area lies immediately adjacent to the Wind River Front Management Area in the Pinedale Field Office and is essentially contiguous with the Jack Morrow Hills area in the Rock Springs Field Office. Together these three areas represent over one million acres of Federal land enjoying at least some level of protection. In a north-to-south direction this protected landscape stretches for nearly 70 miles. The contiguous nature of these three protected areas should be recognized, and accordingly the protected status of the Wind River Front Special Recreation Management Area should be maintained in the revised RMP. However, we do make this recommendation: The "western unit" of this area should be made unavailable for mineral leasing, just as the "eastern unit" is. This would help ensure that this area retains its recreation values and its remarkable undeveloped "feel." And continues to contribute to this landscape scale land protection network. Allowing for potential gas field development would make appropriate management of this area difficult if not impossible. Therefore BLM should put in place management direction that guards against this possibility. Lastly, the Monument Valley Management Area must be mentioned. As noted, this area has important geological, cultural, watershed, scenic, paleontological, and cultural values. And, as will be discussed below, we believe the management direction for this area could form a basis for management in the Adobe Town Heritage Landscape as a whole. And this should be recognized: when the Monument Valley Management Area is coupled with the Adobe Town WSA and the Adobe Town Dispersed Recreation Use Area recognized in the Rawlins RMP, BLM is well on its way to having an overall protective management structure for the Adobe Town area. This should be recognized and maintained by ensuring the Monument Valley Management Area continues to receive protection in the revised RMP.

Nathon Maxon—Wyoming Outdoor Council: While National Monument designation might be essentially foreclosed in Wyoming, another vehicle to achieve NLCS recognized lands is available. And that would be designation of a National Conservation Area (NCA) in the Red Desert. Conservationists have proposed designation of an NCA in the Red Desert for several years, and the Wyoming Outdoor Council supports designation of a Red Desert NCA. These NCA proposals have included the Jack Morrow Hills and/or the Adobe Town area. We propose that BLM support designation of a Red Desert NCA in the revised Rock Springs RMP. This NCA proposal could include the Jack Morrow Hills and Adobe Town areas, and perhaps the Little Mountain area. This would be an important way for BLM to support the NLCS, clearly a goal of BLM. And expanding the NLCS in Wyoming in general and the Red Desert in particular would be especially valuable given the relative paucity of NLCS components in Wyoming at this time. The Red Desert is clearly an area where the NLCS should be prominently represented. There may be no more quintessentially "western" landscape than the Red Desert, so it should be represented in the NLCS. And we note this. There is no doubt that an agency has authority, and even a responsibility, to consider options that are not within its legal ability to implement in an environmental impact statement, if those options help advance the purpose and need of the project. See Natural Resources Defense Council v. Morton, 458 F.2d 827 (D.C. Cir. 1972). See also 40 C.F.R. § 1502.14(c) (requiring reasonable alternatives not within the jurisdiction of the lead agency to be considered). We believe that NCA designation in the Red Desert would significantly help to advance the purpose and need for this RMP revision, which is to provide up-to-date planning guidance for the federal public lands in the Rock Springs Field Office. Consequently, we believe the BLM should go on record supporting Congressional designation of an NCA in the Red Desert in the Rock Springs RMP. Even though Congressional action might take some time and be far from certain in the first place, the BLM could nevertheless go on record with its views regarding NCA designation, which would be helpful.

Nathon Maxon—Wyoming Outdoor Council: While so far as we know ACECs are not currently part of the NLCS, we are unaware of any prohibition on ACECs possibly being designated as components of the NLCS. ACECs, as much as National Monuments or Wilderness Areas or National Historic Trails, could certainly encompass the values protected in the NLCS. For example, ACEC designation of the Jack Morrow Hills area could certainly "conserve the essential fabric of the West" and be "part of an active, vibrant landscape where people live, work and play," is a place "that spark[s] the imagination," and certainly is one of the "remarkable landscapes of the American spirit." The mission of the NLCS "is to conserve, protect, and restore […] nationally significant landscapes that are recognized for their outstanding cultural, ecological, and scientific values." We believe that several areas in the Red Desert of the Rock Springs Field Office easily meet these criteria and would be valuable additions to the NLCS if they were recognized as ACECs. As indicated, these areas are the Adobe Town, Jack Morrow Hills and Little Mountain areas. We do not believe it is necessary to engage in an exhaustive description of the values of these areas. We believe the BLM is fully aware of those values, and in any event we provided some descriptions of those values above. We note that all three of these areas are Wyoming Outdoor Council-recognized Heritage Landscapes: http://wvomin.qoutdoorcouncil.or.q/html/whatwedo/public lands/heritage landscapes.shtml. Consequently, we request that the BLM evaluate designating the Adobe Town, Little Mountain, Cedar Mountain, and Jack Morrow Hills areas as ACECs in the revised Rock Springs RMP. Maps of these Heritage Landscapes can be found on the Wyoming Outdoor Council website referenced above, and we are also providing maps of these areas to you herewith. We believe there is little doubt that these three areas would easily meet the relevance and importance criteria for ACEC designation, and we will not belabor these comments with a detailed description of relevance and importance values. But, if the BLM were to designate these areas as ACECs as part of the RMP revision we request that it also contemporaneously designate these areas as components of the NLCS. We believe there is widespread recognition that the Red Desert is worthy of recognition in the NLCS, so the mechanism we have proposed here presents an opportunity for fulfilling this promise.

Erik Molvar—Biodiversity Conservation Alliance: Areas of Critical Environmental Concern: (1.) Existing Areas of Critical Environmental Concern will be retained in the new Plan. (2.) The following areas will be designated as new Areas of Critical Environmental Concern: Monument Valley Management Area, Little Mountain, and the two Sage Grouse ACECs at South Pass and Kinney Rim-Vermillion. (3.) Big game crucial habitats as delineated by WGFD will be leased only under No Surface Occupancy stipulations. (4.) All ACECs will be withdrawn from locatable mineral entry and be classified as "unsuitable" for coal leasing. 4. Fluid minerals in all ACECs may be leased only under No Surface Occupancy stipulations.

Erik Molvar—Biodiversity Conservation Alliance: Little Mountain: The BLM should consider establishing Little Mountain and ecologically connected lands as an ACEC to protect elk and mule deer crucial ranges and migration corridors as well as Colorado River cutthroat trout populations in neighboring streams. This could be accomplished by combining the Greater Red Creek ACEC and Surgarloaf Basin SMA with adjacent lands and designating a larger ACEC closed to future surface occupancy for oil and gas leasing and wind power development.

Erik Molvar—Biodiversity Conservation Alliance: Monument Valley Management Area: We ask BLM to prioritize this area in the new RMP for acquisition of private checkerboard inholdings (both surface and mineral) to consolidate the land in BLM ownership and provide better public access.

Erik Molvar—Biodiversity Conservation Alliance: Red Desert National Conservation Area: The BLM will recommend the designation of a Red Desert National Conservation Area to Congress, consisting of a southern unit that encompasses the Adobe Town Very Rare or Uncommon area and Kinney Rim citizens' proposed wilderness units, a northern unit that encompasses the Jack Morrow Hills planning area, and a smaller western unit along the Big Sandy River downstream from Farson.

Erik Molvar—Biodiversity Conservation Alliance: Sage Grouse ACECs: The BLM is currently considering the establishment of sage grouse ACECs in the RSFO through the statewide Sage Grouse RMP Amendments. We agree that both of the proposed ACECs (South Pass and Kinney Rim – Vermillion) are deserving of designation as ACECs and subsequent management for no future oil and gas leasing and wind power development in these areas.

Erik Molvar—Biodiversity Conservation Alliance: We recommend that all currently existing ACECs be retained under the new plan, and additional ACECs would be added as outlined below. All of these areas should be withdrawn from surface disturbing activities and leased only under No Surface Occupancy (NSO) restrictions. In addition to the special areas enumerated in the sections that follow, all crucial winter relief and elk calving areas identified by WGFD should be granted ACEC status and withdrawn from new mineral leasing and entry.

Erik Molvar—Biodiversity Conservation Alliance: Wild and Scenic Rivers: (1.) Segments of the Big Sandy River, Sweetwater River, and Bitter Creek will be nominated for protection under the Wild and Scenic Rivers Act.

Erik Molvar—Biodiversity Conservation Alliance: Wild and Scenic Rivers: We recommend that the BLM evaluate the following streams for Wild and Scenic River designation. The Big Sandy and Sweetwater Rivers contain important trout fisheries, and are representative of cold desert rivers. Bitter Creek occupies the nation's largest intermittent/ephemeral watershed, according to Dr. Craig Thompson of Western Wyoming College. It has high scientific value for this reason. Free-flowing sections of the Green River should also be included, both for their recreational value for fishing and boating, their contribution to the Seedskadee NWR, and their intrinsic value to rare native fishes that reside both in the planning area and downstream.

The Rev. Warren Murphy: Adobe Town is of prize importance. I would love to see this area set aside as a national park at best and at least a National Conservation Area. This is land that I have explored both from the Rock Springs and Baggs sides. It is an area that contains some of the best in scenery, wilderness characteristics and a place of retreat and refreshment. I compare it to the best of the outback in Australia and am concerned that it faces physical and scenic threats from encroaching natural resource development. Increased mining and drilling will threaten sage grouse and other wildlife as well as scar the landscape and import alien weeds and seeds through increased truck traffic. There are plenty of other places to drill and many leases have yet to be utilized. The Adobe Town area should be given extra special protections for these reasons. It is one of the last remaining places in the state that offers an absolute wilderness experience in the desert.

The Rev. Warren Murphy: Jack Morrow Hills, Boar's Tusk, sand dunes and Kinney Rim should also receive special consideration. These are unique locations in Wyoming. Increased truck traffic and off road vehicle use could destroy the unique characteristics of this land. Boar's Tusk is one of the state's symbols and should remain "as is" with no further deterioration. All of these areas are seeing increased tourism and this should be taken into consideration in future planning. The wild horse population is also a part of this uniqueness. The horses are a valuable part of our history and legacy in Wyoming. I realize that there is a population problem and would like to suggest this be solved with increased PZP use rather than costly helicopter roundups. This is now being utilized in the Big Horn Basin and will provide the Interior Department with increased financial savings. Simply placing horses from the roundups in holding pens is not the answer. The PZP solution should be considered and safely practiced.

The Rev. Warren Murphy: Little Mountain is also a precious resource even though it is not ordinarily considered as part of the Red Desert. It is a unique setting in a desert environment. It contains mountain characteristics close to the desert terrain and is important for recreation for those people in the Rock Springs geographical area. While I have not traveled there extensively, I know that it makes up a valuable part of the ecosystem that affects the Red Desert environment. Planning should limit industrial development in this mountain terrain.

John Spezia: We need Area of Critical Environmental Concern (ACEC) status for the Monument Valley Management Area, and retaining currently designated ACECs with stronger protections that minimize the footprint of drilling.

SPECIAL STATUS SPECIES

Kent Connelly—Coalition of Local Governments: CLG supports the use of CCAAs as a conservation measure for the sage grouse and other candidate species. These are of limited utility given the landownership pattern in the project planning area unless BLM is an active participant in giving public land users similar assurances. The objective of a CCAA is to give landowners a commitment of no regulatory changes in exchange for the landowners' commitment to specific management practices affecting identified lands. BLM should be willing to provide a similar level of commitment to no new regulatory measures. CLG also supports the idea of a multi-species agreement rather than adopting a piecemeal approach to management of a single species when the same landscape is affected.

Joshua W.D. Coursey—Greater Little Mountain Coalition: 12. Much of the GLMA is within Wyoming's Greater sage grouse core population area. When developing management protocols, use the State of Wyoming's Executive Order 2010-4 for guidance and inclusion within the RS RMP.

Nada Culver—The Wilderness Society: In addition, we ask that BLM: Develop a suite of straightforward, mandatory protections from surface disturbance and energy development that are consistent with the best available science on greater sage-grouse and that provide certainty to industry, USFWS, state agencies and conservation organizations regarding what will be required. Apply all of the protections discussed previously regardless of whether or not an area has been leased. Leasing is inherently speculative and the BLM has acknowledged that it can apply conditions to leased lands. Conference with the U.S. Fish and Wildlife Service regarding how sage-grouse should be managed under the RMP. The BLM should conduct no new leasing and approve no new energy projects (including APDs) in sage-grouse habitat until reference area, priority habitat and recovery habitat areas are delineated, mandatory protections are developed, and the RMP incorporates these protections and is finalized. Conduct development planning on a landscape level, not at an individual well or lease basis, and incorporate clustered development to reduce fragmentation and maintain unfragmented blocks of habitat. Analyze an alternative that maximizes avoidance and protection for sage-grouse habitat. The protective measures applied through this alternative should be consistent with a goal of increasing greater sage-grouse populations in the Field Office. Sage-grouse population persistence is directly influenced by landscape characteristics for distances up to 33.5 miles from a lek (Holloran and Anderson 2005, Walker et al. 2007, Johnson et al. 2009, Knick and Hanser 2009, attached). Landscape-scale effects also are significant in winter habitat selection by grouse (Doherty et al. 2008). - The combination of multiple land uses may influence sage-grouse more than any single use. Lek abandonment (and presumably population declines), increase with increases in the cumulative measure of human influence on the landscape, called the "human footprint." While sage-grouse populations may not necessarily be lost as the result of a single anthropogenic feature (e.g. a road or an oil and gas well), multiple human features on the landscape may act in synergy to cause impacts that exceed a threshold, resulting in population loss. Growing evidence suggests that sage-grouse respond to anthropogenic features at large scales, and changes need to be made to existing management strategies to account for sage-grouse movement and dispersal patterns, and the cumulative impacts of human uses at a landscape scale. Cumulative impacts have resulted in a decline in carrying capacity (the number of birds the habitat can support) at a rate of 2% to 12% per year in nearly half of the greater sage-grouse populations that have been monitored over time. Management that does not consider the cumulative impacts of human activities at a landscape scale will not be capable of reversing ongoing declines in the carrying capacity of sage-grouse habitat. http://sagemap.wr.usgs.gov/monograph.aspx, Chapters 14 and 16. Doherty (2008) found that once the number of oil and gas wells on the landscape exceeds a threshold of 12 wells within a 2-mile buffer around active leks (1 well per 640 acres), the landscape becomes unsuitable for sage-grouse resulting in lek loss and population declines. Siting energy development facilities within 3.9 miles of a lek results in measureable impacts on sage-grouse leks and breeding populations (Naugle et al. 2009, attached). The

U.S. Fish and Wildlife Service recommends avoiding placing wind turbines within 5 miles of sage-grouse leks (USFWS, 2004, attached). Declines in male greater sage-grouse lek attendance occur within 1.9 miles of a well or haul road with traffic volume exceeding one vehicle per day (Holloran 2005, attached).

Nada Culver—The Wilderness Society: Other threatened and endangered species: The BLM's goal should be to maintain and increase populations of all threatened and endangered species and other rare and imperiled species within the Rock Springs Field Office. The RMP should identify key habitat for rare and imperiled species in the Field Office and designate such areas as Areas of Critical Environmental Concern. The BLM should develop a comprehensive suite of management prescriptions for each TES and rare and imperiled species within the Field Office, and should ensure that such prescriptions are consistent with the goal of maintaining and increasing populations for these species. There should be areas of key habitat for each species within the field office, where the management emphasis is on protecting the species, and where any uses inconsistent with this goal are prohibited. BLM should consider and incorporate as applicable the science and management recommendations in the attached literature in managing rare plants and raptors (USFWS draft raptor guidelines and RPCI rare plant BMPs).

Nada Culver—The Wilderness Society: Recommendation: BLM should incorporate specific, scientifically-supported management strategies and prescriptions for special status species, with an overall goal toward improving populations and viability.

Nada Culver—The Wilderness Society: The BLM's goal in the RMP should be to maintain and increase populations of white-tailed prairie dogs and associated species on the Rock Springs Field Office. Center for Native Ecosystems nominated three large white-tailed prairie dog colonies as Areas of Critical Environmental Concern in the Rock Springs Field Office in 2003, the Baxter Basin, Flaming Gorge, and Kinney Rim complexes (see Nominations for the Designation of Areas of Critical Environmental Concern for 25 Large White-Tailed Prairie Dog Complexes – submitted to BLM in 2003 – and attached to these comments). We ask that BLM designate these complexes as Areas of Critical Environmental Concern through this RMP revision process and manage white-tailed prairie dogs within these areas according to the management guidelines outlined in our ACEC nomination document (id pp. 14-19). We recommend that BLM work to reintroduce black-footed ferrets to the Rock Springs Field Office. BLM should: (1) identify white-tailed prairie dog colonies that are currently large enough to support black-footed ferrets, (2) if no such colonies currently exist, identify colonies that could be proactively restored to a size sufficient to support black-footed ferrets, and then (3) proactively work towards reintroduction of black-footed ferrets. BLM should consider developing a comprehensive and proactive conservation assessment and management strategy for white-tailed prairie dogs and black-footed ferrets, similar to the Thunder Basin Black-tailed Prairie Dog Conservation Assessment and Management Strategy (attached). Further, BLM should consider the information, references and management prescriptions outlined in this strategy, in developing management prescriptions for white-tailed prairie dog and black-footed ferret, in the Rock Springs RMP.

Nada Culver—The Wilderness Society: To conserve greater sage-grouse in the Rock Springs Field Office, we recommend that BLM: Manage for no loss of current greater sage-grouse populations. Refine the BLM's lek-based priority habitat maps to incorporate seasonal habitats and areas important for connectivity. Implement the following types of protections for the following three categories of sage-grouse habitat: Reference Areas: Protect some sage-grouse populations within the Rock Springs Field Office from all surface disturbance/fragmentation, so that there are areas that may serve as reference areas to compare other management scenarios against and as an insurance policy in case our current understanding of what sage-grouse can tolerate is wrong. Reference areas should include areas that currently support the highest densities of sage-grouse and contain the least fragmented, highest quality habitat within the field office. Reference areas should be conserved as true reserves, managed with emphasis on the conservation of sage-grouse. All uses that degrade habitat or affect sage-grouse behavior

should be precluded in these areas, and existing harmful land uses should be phased out in these areas. The following management prescriptions should be applied in these areas: • Close reference areas to energy and mineral development • Prohibit surface disturbance and surface occupancy • Prohibit construction of infrastructure (powerlines, roads, fences etc.) • Close to motorized recreation • Retire livestock grazing allotments • Remove fences • Close roads • Bury existing utility lines and pipelines • Designate these areas as ACECs and eventually secure permanent protective designation. Priority Habitat: This should consist of all remaining currently occupied habitat (including not only leks/breeding habitat but also other seasonal habitats and movement corridors). BLM should apply all of the following protections in priority habitat: • 6.2-mile No Ground Disturbance/No Surface Occupancy buffers around active leks • 640-acre maximum energy structure surface spacing of energy development structures • 5% maximum cumulative surface disturbance per Section in priority habitat outside lek buffers • Timing limitations specific to the season of use of the different habitat types that would apply not only to all phases of energy development but also other sources of disturbance. • Cluster development to maintain large unfragmented blocks of sage-grouse habitats • Prohibit new transmission lines unless they are constructed in close proximity to existing lines and/or buried • Limit AUMs on grazing allotment to a level consistent with maintaining high-quality sage-grouse habitat, and consider prohibiting spring grazing. • Limit motorized use to designated routes; close routes that are too close to leks or other critical sage-grouse habitat areas, or that are facilitating off-road-vehicle use that is degrading sage-grouse habitat. Place seasonal closures on routes during critical seasons (e.g., in breeding habitat during the breeding season, in winter habitat in winter). • Noise should be limited to levels below thresholds for disturbance of sage-grouse. • Designate these areas as Areas of Critical Environmental Concern. The BLM should protect sufficient reference and priority habitat to ensure the long-term persistence of sage-grouse at levels equal to or higher than current numbers. Recovery Habitat: This should consist of areas that provide connectivity between populations, that are likely to become important given projected impacts of climate change, or that would allow for expansion of current populations and/or reestablishment of extirpated populations. The following management prescriptions should be applied in recovery habitat: • Maximum energy structure surface spacing should be capped at 640-acres and a maximum of 5% cumulative surface disturbance per Section. • Opportunities to reduce fragmentation and restore healthy sagebrush ecosystems should be pursued in these areas. The BLM should consider convening an independent panel of recognized sage-grouse experts to delineate reference areas, priority habitat and recovery habitat within the Rock Springs Field Office.

John Emmerich—Wyoming Game and Fish: The Department is currently working towards restoration of sensitive native flannelmouth and bluehead sucker populations in the Big Sandy River drainage upstream of Big Sandy Reservoir and the Little Sandy River drainage upstream of the Eden Reservoir diversion structure through removal of competing non-native fish species. This native fish restoration is a component of a larger proactive effort to improve and sustain those relict flannel mouth and bluehead sucker populations within their native range in Wyoming to preclude consideration for listing under the Endangered Species Act. Achieving and sustaining healthy watershed function, riparian habitats, and lotic aquatic habitats with connectivity within the above-mentioned focus segments of the Big and Little Sandy River watersheds will be necessary in order to successfully restore and maintain viable populations of these native fish species. These watershed segments also provide extremely important habitat for sage grouse core area, and crucial winter range for mule deer, pronghorn, elk, and moose. Due to the area providing crucially important habitats for both aquatic and terrestrial wildlife species, we recommend special management actions and appropriate habitat protections for all BLM lands within the landscape encompassed by the Big and Little Sandy River watersheds upstream of the Farson/Eden Irrigation Project Area boundary. • Upper Bitter Creek supports what is thought to be one of the last known native flannel mouth sucker populations remaining in Wyoming that have not yet experienced hybridization with white suckers, which warrants protection of the population and their habitat. A private land irrigation diversion structure near Thayer Junction (Peirrotto Ditch), is serving as an incidental fish barrier to prevent the upstream movement of nonnative white suckers and hybridization with the native

flannelmouth sucker population. The irrigation diversion structure is also acting as a stream gradient control point to prevent an incised head-cut from moving upstream and destabilizing/degrading riparian habitat with the stream reach inhabited by flannelmouth suckers and other native fish. The diversion structure is in disrepair and will need to be renovated to keep the structure from failing. A significant portion of the upper Bitter Creek watershed is experiencing oil and gas development and coal mining. RMP planning efforts are needed to minimize the cumulative negative impacts of these and other land uses to watershed function in order to maintain adequate stream habitat conditions in upper Bitter Creek for native fishes.

John Emmerich—Wyoming Game and Fish: The Midget Faded Rattlesnake is a species of state concern found within the Rock Springs BLM management area. The area surrounding Flaming Gorge contains the only known population of this species in the state. The Midget Faded Rattlesnake's core range is thought to extend from Hwy 530, east to US Hwy 191, and north to Interstate 80. However, Midget Faded Rattlesnakes have been observed north of Interstate 80 up to Greasewood Canyon and could occur as far north along the Green River as Hwy 28. Midget Faded Rattlesnakes inhabit sagebrush communities in the plains zone. This species requires an abundance of south-facing rock outcroppings and exposed canyon walls. Rocky outcrops are essential for cover, variable thermal conditions, and hibernation. Known hibernacula for this species should be protected.

John Emmerich—Wyoming Game and Fish: We recommend that the RMP stipulations for sage grouse protections be consistent with those outlined in the Wyoming Governor's Executive Order for Greater Sage Grouse Protections.

John Hay, III—Rock Springs Grazing Association: BLM and State agencies have established critical habitat and core areas based on a marginal data in attempts to mitigate the listing of sage grouse as endangered species. These areas were established and maps prepared without full consideration for how to require and implement disturbance analysis and surface use restrictions in the checkerboard. Unlike solid block BLM ownership, where BLM can make decisions and apply restrictions, similar decisions cannot be made by BLM on the checkerboard. BLM implementation of development restrictions in the core areas is limited by the degree knowledge of land use decisions of the neighbor. Private land owners do not have to disclose to BLM approved or pending projects on their land. This makes the envisioned site-specific detailed surface disturbance analysis a mute exercise in the checkerboard. RMP recommendations will have to address this reality.

Steve Holmer—American Bird Conservancy: (1.) Provide for no net loss of Sage Grouse habitat. We are concerned about the extensive loss of sagebrush that occurred due to oil and gas development during the last decade that has led to habitat fragmentation. **(**2.) The U.S. Fish and Wildlife Service is recommending that developments such as wind towers be at least three miles from Sage Grouse leks. We urge the plan include that as a minimum standard. (3.) We urge the agency to identify areas of high concern for wind development. Siting is the essential first-step towards bird-smart wind development. By identifying areas with potential for wildlife impacts, it can help steer projects to less sensitive areas. **(**4.) Analyze the cumulative impacts of grazing on Sage Grouse and other sagebrush species. Grazing continues to degrade sagebrush habitats and potentially needs to be limited or eliminated in some areas to effectively conserve Sage Grouse.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Greater Sage-Grouse - The State of Wyoming has spent considerable time and effort on conservation of Greater sage-grouse, a process in which the BLM has had equal footing and considerable influence. This strategy has met with approval from the U.S. Fish and Wildlife Service, and has been shown to be biologically and economically sound if implemented on all landscapes. I simply insist that the RMP recognize the Wyoming strategy for Core Area Populations, and the corresponding management directives.

Carl Millegan—U.S. Fish and Wildlife Service: The refuge is also requesting that the Bureau of Land Management strongly consider an alternative within their RMP that is specifically geared towards Sage grouse Management and habitat improvements for Sage grouse within the entire district. Because the BLM manages the largest portion of lands used by Sage grouse and the largest portions of core areas identified by the Governor's Sage grouse management plan for the state of Wyoming directly associated with BLM lands, it would make sense to have a Sage grouse management alternative in the plan for the public to consider.

Erik Molvar—Biodiversity Conservation Alliance: Actions which might lower water temperatures are likely to jeopardize the survival and reproduction of pikeminnows. Fluctuating water temperatures actually increased larval survival over constant water temperatures, even when these were optimal, suggesting that diurnal water temperature fluctuations are beneficial to larval pikeminnows (Ibid.). Water inputs that depress water temperatures or alter natural temperature fluctuations must not be allowed.

Erik Molvar—Biodiversity Conservation Alliance: Areas within 3 miles of a sage grouse lek should be put under year-round stipulations preventing habitat alterations.

Erik Molvar—Biodiversity Conservation Alliance: Because leks sites are used traditionally year after year and represent selection for optimal breeding and nesting habitat, it is crucially important to protect the area surrounding lek sites from impacts.

Erik Molvar—Biodiversity Conservation Alliance: BLM management should seek to minimize populations of white sucker in order to reduce hybridization risks.

Erik Molvar—Biodiversity Conservation Alliance: Bonytail Marsh (1985) found that survival and hatch of bonytail eggs was greatest at 15° and 20°C, while temperatures of 5°, 10°, and 30°C caused total egg mortality. Like other Colorado River Endangereds, the maintenance of bonytail viability hinges at least in part on maintaining natural temperature levels and fluctuations. The loss or degradation of habitat due to dams and water diversions is the primary source for bonytail decline (Sigler and Sigler 1996, Ono et al. 1983). Poor habitat causes stress, which may make the species less competitive, more susceptible to diseases and parasites, and more likely to hybridize (Sigler and Sigler 1996).

Erik Molvar—Biodiversity Conservation Alliance: Brood-rearing habitats should thus be identified and managed to maximize sage grouse recruitment success. The availability of forage with a high nutritional content is an important factor determining brood success. Thus, the BLM should manage sage grouse brood-rearing habitat to maximize high-quality forage for chicks.

Erik Molvar—Biodiversity Conservation Alliance: Connelly et al. (2000) proposed comprehensive guidelines regarding the management of sage grouse, focused around the conservation of breeding/nesting habitat, late summer brood-rearing habitat, and wintering habitat. We recommend that these guidelines be implemented in the forthcoming RMP, with the modification of a 3-mile NSO and no surface disturbance/vegetation treatment buffer for sage grouse leks in order to protect the leks themselves as well as adjacent nesting habitat.

Erik Molvar—Biodiversity Conservation Alliance: Finally, there are a number of species that through game animal status or other reasons are of high importance to the public, and the new RMP must also maintain the viability of these species throughout the Great Divide area.

Erik Molvar—Biodiversity Conservation Alliance: Humpback Chub (Gila cypha): Dropping temperatures can also prevent humpback chub reproductive success. Hamman (1982) found that found when temperatures dropped to 12-13°C, humpback chubs experienced 88% egg mortality and 85% fry

mortality. Marsh (1985) found that survival and hatch of humpback chub eggs was greatest at 20°C, while temperatures of 5°, 10°, and 30°C caused total egg mortality. Thus, actions which cause a drop in water temperatures or a shift in seasonal temperature regimes must not be allowed.

Erik Molvar—Biodiversity Conservation Alliance: In addition to such indicator species, there are a number of species on the BLM Sensitive Species List, the WGFD (NSS) Species Watch List, watch lists of globally imperiled and locally rare species tracked by the Wyoming Natural Diversity Database, and federally listed species under the protection of the Endangered Species Act, all of which merit special conservation concern and attention. These species are of special concern because they are currently rare, are experiencing significant declines in overall population or distribution, or both. Some are at risk for global extinction. The new RMP must include standards that guarantee the viability, and if needed, the recovery of these species.

Erik Molvar—Biodiversity Conservation Alliance: Monitoring: The number of active sage grouse leks can be a useful index of sage grouse population trends (Emmons and Braun 1984). Autenreith et al. (1982) provide a sound monitoring protocol which the BLM should adopt to monitor sage grouse trends. Aerial lek surveys should be undertaken each spring to determine presence/absence of grouse on known lek sites and to locate new lek sites, and a subset of leks should be censured at regular intervals at dawn throughout the breeding season to gain an index of population trend. It is important to note that the number of grouse at a lek site can vary greatly from day to day (Beck and Braun 1980), so repeat censuses will be needed to establish a mean value. Emmons and Braun (1984) pointed out that timing of lek counts may affect number of grouse observed, as lek attendance is not constant and males commonly move between leks. These researchers recommended that four separate lek counts be taken for each lek, about 10 days apart. Brood counts should be undertaken 11-13 weeks after the peak of hatch using chick distress calls, and average number of chicks per hen should be derived, using both successful and nullparous hens.

Erik Molvar—Biodiversity Conservation Alliance: Mountain Plover: The mountain plover's status under the Endangered Species Act is currently under litigation, and its range-wide decline appears to be continuing. Wyoming (along with Colorado and Montana) is one of three states that encompass the majority of plover's breeding population (USFWS 1999); approximately 1,500 birds are estimated to occur in Wyoming (Long 2001). On Mexican Flats (in the eastern Red Desert), nesting plovers are associated with bare ground and prairie dog colonies amid scattered sagebrush (Fritz Knopf, pers. comm.). Mountain plovers have been recorded on the Adobe Town Rim and south of The Haystacks, on the Joe Hay and Bush Rims in the Jack Morrow Hills planning area, and elsewhere within the bounds of the Rock Springs Field Office. Thus, mountain plover nesting activity is widely dispersed across the planning area.

Erik Molvar—Biodiversity Conservation Alliance: Oil and Gas Development Oil and gas development poses perhaps the greatest threat to sage grouse viability in the region. Clait Braun (pers. comm.), the world's most eminent expert on sage grouse, recommended even larger NSO buffers of 3 miles from lek sites, based on the uncertainty of protecting sage grouse nesting habitat with smaller buffers. Thus, areas within 3 miles of a sage grouse lek should be put under year-round "No Surface Occupancy" stipulations.

Erik Molvar—Biodiversity Conservation Alliance: Razorback Sucker (Xyrauchen texanus) Marsh (1985) found that survival and hatch of razorback sucker eggs was greatest at 20°C, while temperatures of 5°, 10°, and 30°C caused total egg mortality. Modde (1996) found that juvenile razorback suckers use wetlands during spring peak flows, and flooded bottomlands may be important nursery areas. Thus, activities that change temperature regimes are likely to adversely affect razorback sucker viability.

Erik Molvar—Biodiversity Conservation Alliance: Road Development Road development can lead to lek abandonment (e.g., Braun 1986). In western Wyoming, Lyon (2000) found that for sage grouse leks within 3 km of oil and gas developments, grouse hens successful at raising their broods selected habitats farther from roads than unsuccessful hens. This finding indicates that habitats near roads experience reduced brood survivorship. Thus, we seek a moratorium on all road building within 3 miles of a lek site.

Erik Molvar—Biodiversity Conservation Alliance: Sage Grouse Predators: A number of raptors and medium-sized mammalian carnivores prey on sage grouse. Sage grouse nest predators include bobcats, golden eagles, red fox, badgers, common ravens, and coyotes (Heath et al. 1997). Coates and Delahanty (2010) found that increases in raven populations were correlated with sage grouse declines in Idaho. Hulet et al. (1986) found that the Uinta ground squirrel was the most important nest predator in their southern Idaho study area. Interestingly, Mezquida et al (2006) postulated that "coyote control is likely detrimental to sage grouse conservation" because coyotes may have a negative influence on foxes, badgers, and ravens, which are the most important nest predators for sage grouse. The maintenance of appropriate habitat and adequate cover, particularly on nesting and brood-rearing habitats, is important to ensure that predation rates do not increase to abnormal levels. In addition to maintaining cover, it is important to avoid the construction of tall structures that serve as raptor perches and concentrate predation pressure, like powerlines and gas condensate tanks, near these habitats.

Erik Molvar—Biodiversity Conservation Alliance: Sensitive Plants Management: (1.) All current special management areas should be maintained. (2.) The BLM should take measures to ensure preservation of the plant species of concern listed on the Wyoming Natural Diversity Database.

Erik Molvar—Biodiversity Conservation Alliance: Shorebirds and Waterfowl: Waterfowl and shorebirds are dependent to one degree or another on the maintenance of wetlands. Data from the Wyoming Natural Diversity Database indicate records for the following shorebird and waterfowl species of concern in the general region: common loon, Clark's grebe, American white pelican, American bittern, white-faced ibis, ring-necked duck, bufflehead, snowy plover, upland sandpiper, long-billed curlew, Wilson's phalarope, and three species of tern. WGFD (1995) recommended censuring waterfowl and shorebirds on all surface waters, and in particular getting counts of breeding pairs. The large number of sensitive or rare waterfowl and shorebirds found in the lands managed by the Rock Springs Field Office make it imperative that the few wetlands found on these lands receive ample protection.

Erik Molvar—Biodiversity Conservation Alliance: Standards should be issued preventing the spraying of insecticides in sensitive sage grouse habitats during periods where these habitats are occupied.

Erik Molvar—Biodiversity Conservation Alliance: Strip Mining: Coal mining can impact sage grouse populations through major local decreases in recruitment (Braun 1986); local distribution patterns and decreases in lek use are the principal effects, with disturbance, rather than habitat loss, being the primary factor (Remington and Braun 1991). Klott (1987) recommended that areas near sage grouse leks be avoided for the purposes of strip mining. We concur, and ask the BLM to withdraw lands within 3 miles of a sage grouse lek from lands suitable for surface mining under SMCRA.

Erik Molvar—Biodiversity Conservation Alliance: Taking into account the negative effects of vegetation treatments on sage grouse nesting and lekking areas, and uncertainty in the overall extent of sage grouse nesting habitat surrounding lek sites in the Great Divide region, the BLM should prohibit vegetation treatments within 3 miles of sage grouse lek sites.

Erik Molvar—Biodiversity Conservation Alliance: The BLM must identify sage grouse wintering habitats within the planning areas and emplace strong measures to protect them from vegetation treatments and industrial projects. Thus, in the Rock Springs planning area, the BLM needs to rapidly

identify sage grouse winter concentration areas and place the areas off-limits to surface disturbance and vegetation treatments.

Erik Molvar—Biodiversity Conservation Alliance: The BLM must maintain the natural regime of flow change and temperature so that pikeminnow migration and spawning activities are not disrupted. Wastewater discharge that enters the Little Snake system directly or via groundwater would alter the chemical signature of the water; this must not be allowed.

Erik Molvar—Biodiversity Conservation Alliance: The BLM should protect large sage grouse Core Areas like South Pass and the Kinney Rim/Vermillion core from future oil and gas leasing as a means of providing a reservoir of healthy populations of sagebrush obligate wildlife.

Erik Molvar—Biodiversity Conservation Alliance: The maintenance of high-quality sagebrush steppe habitats, particularly nesting and wintering habitats, is necessary to maintain sage grouse viability on the landscape scale. Thus, it is important to foster sagebrush growth at levels useful to sage grouse and to avoid activities that destroy suitable sagebrush habitat. Thus, management for sage grouse should include special emphasis on protecting wet meadows, springs, and seeps. Holloran (1999) recommended leaving residual grass heights greater than 12 cm following removal of livestock in autumn. Thus, not only sagebrush height and density but also understory grass cover are important to maintain in sage grouse nesting areas.

Erik Molvar—Biodiversity Conservation Alliance: The reduction in prairie dog colonies has been directly implicated as an important cause of mountain plover declines range-wide. Knowles et al. (1999) found that the disappearance of prairie dogs due to plague and/or recreational shooting also led to abandonment of nesting habitat by plovers, and plover numbers increased on sites where prairie dog populations were expanding. According to the U.S. Fish and Wildlife Service (1999), "Further loss of prairie dog towns within the current breeding range of the mountain plover would be detrimental to plover conservation. Conversely, the conservation of the mountain plover can be enhanced by implementing strategies to increase the distribution and abundance of prairie dogs on breeding habitat" (p. 7594). Thus, the conservation of prairie dog colonies is a prerequisite to maintaining viable populations of mountain plover.

Erik Molvar—Biodiversity Conservation Alliance: The use of disturbance-sensitive indicator species to monitor the impacts of human activities is done by the Forest Service, and holds great promise on BLM lands as well. We encourage BLM to monitor population trends of species sensitive to management activities as a means to tell when adaptive management changes are required.

Erik Molvar—Biodiversity Conservation Alliance: We concur, and urge the BLM not only to avoid the proliferation of new roads and user-created vehicle routes in nesting habitats but also to schedule events away from nesting habitats and avoid scheduling them during the nesting period.

Erik Molvar—Biodiversity Conservation Alliance: We support the BLM's current policy of fencing off natural springs and placing livestock water sources outside the fences rather than at the spring itself. For allotments where sage grouse nesting is known to occur, shifting on-off dates (if necessary) could minimize the chances of impacts to nesting sage grouse, and livestock drives should be routed to avoid sage grouse leks during the strutting and nesting seasons.

Erik Molvar—Biodiversity Conservation Alliance: WGFD (1998) has set forth recommendations for allowing habitat-disturbing activities and mitigation for these activities if allowed. Federal Candidate Species and Native Species Status 1 and 2 receive a mitigation category of "Vital," for which habitat directly limits populations and restoration may be impossible; habitat function must be maintained if

habitat modification is allowed to occur. In the Rock Springs Field Office, species in this category include mountain plover, common loon, bald eagle, yellow-billed cuckoo, pygmy shrew, Townsend's big-eared bat, boreal toad, roundtail chub, sturgeon chub, hornyhead chub, bluehead sucker, flannelmouth sucker, and Colorado River cutthroat trout. Habitats such as Crucial Winter and Crucial Winter Relief Ranges also receive a mitigation category of "Vital." Native Species Status 3 receive a mitigation category of "High," for which WGFD recommend no net loss of habitat function through enhancement of degraded habitat when a habitat disturbing project is proposed. In the Rock Springs Field Office, species in this category include the American white pelican, American bittern, merlin, peregrine falcon, long-billed curlew, Caspian tern, Forster's tern, Lewis' woodpecker, western scrub-jay, juniper titmouse, bushtit, Scott's oriole, dwarf shrew, black-tailed prairie dog, white-tailed prairie dog, plains pocket mouse, Great Basin pocket mouse, silky pocket mouse, swift fox, and wood frog. Big game winter-yearlong ranges and parturition areas also fall under the "High" reclamation category, demanding no net loss of habitat function. Furthermore, for Endangered or Threatened Species such as the Wyoming toad, WGFD recommends exclusion of any habitat impacting activity. For these species, "The Commission recognizes that some wildlife or wildlife habitats are so rare, complex and/or fragile that mitigation options are not available. Total exclusion of adverse impacts is all that will ensure preservation of these irreplaceable habitats" (Ibid., p. 4). We concur wholeheartedly, and point out that FLPMA carries a legal requirement for the BLM to manage its lands in accord with state directives such as the WGFD Mitigation Policy.

Erik Molvar—Biodiversity Conservation Alliance: Wyoming Sensitive Species Roundtail chubs, flannelmouth suckers, and bluehead suckers can be found in the Rock Springs Field Office. These species reside in large, slow-moving rivers and also in smaller tributary streams (Bezzerides and Betsgen 2002). They may also have been planted in reservoirs. According to Wheeler (1997), these species "have experienced dramatic reductions in their range in western Wyoming since 1965, and may need immediate conservation attention" (p. 54). In the Upper Colorado Basin, the roundtail chub has been extirpated from 45% of its historical range, bluehead suckers occupy about 45% of their historical range, and the flannelmouth sucker occupies about 50% of its historic range (Bezzerides and Bestgen 2002). All three of these species are on the BLM Sensitive Species list and merit special conservation attention.

Peter Nelson—Defenders of Wildlife: "Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. This may include identifying stipulations or criteria that would be applied to implementation actions" (p. C-4). This direction is particularly important because it goes beyond just listing the decisions that should be included (desired outcomes, strategies, restoration opportunities, use restrictions, and management actions) and actually describes how those decisions should be formed and what they should contain. Decisions that are too broad or unclear will not be useful in future decision-making. In the context of monitoring and evaluation, it is vital that narrow and clear direction be provided so that progress can be measured. Such clarity also provides certainty for all stakeholders: Right of Way applicants, the public, and the land managers responsible for meeting policy requirements (like the special status Species policy discussed below). Defenders recommends that BLM fully incorporate each of the potential decision options laid out here and that the RMP use clear standards, including stipulations and criteria, as a method for ensuring that wildlife policy objectives are met at the project level throughout the life of the RMP.

Peter Nelson—Defenders of Wildlife: Protection: Defenders recommends that the Rock Springs RMP incorporate detailed standards for the protection of each special status species in the planning area to guide future management actions. Once standards are established, the SSS policy provides additional guidance regarding implementation of the RMP. The following actions are intended to minimize or eliminate threats to SSS and their habitats or to improve their condition: (1.) Determining, to the extent practicable, the distribution, abundance, population condition, current threats and habitat needs for sensitive species, and evaluating the significance of BLM-administered lands and actions undertaken by

the BLM in conserving those species. (2.) Ensuring that BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate, spatial scale. (3.) Monitoring populations and habitats of Bureau sensitive species to determine whether Species management objectives are being met. (4.) Working with partners and stakeholders to develop species-specific or ecosystem-based conservation strategies (see 2D Agreements, Assessments and Cooperative Strategies for Conservation). (5.) Prioritizing Bureau sensitive species and their habitats for conservation action based on considerations such as human and financial resource availability, immediacy of threats, and relationship to other BLM priority programs and activities. (6.) Using Land and Water Conservation Funds, as well as other land tenure adjustment tools, to acquire habitats for Bureau sensitive species, as appropriate. (7.) Considering ecosystem management and the conservation of native biodiversity to reduce the likelihood that any native species will require Bureau sensitive species status. (8.) In the absence of conservation strategies, incorporate best management practices, standard operating procedures, conservation measures, and design criteria to mitigate specific threats to Bureau sensitive species dining the planning of activities and projects. Land Health Standards should be used for managing Bureau sensitive species habitats until range-wide or site-specific management plans or conservation strategies are developed. Offsite mitigation may be used to reduce potential effects on Bureau sensitive species.

Peter Nelson—Defenders of Wildlife: Special Status Species direction for implementation decisions is simple but important: "identify the programmatic and site-specific actions needed to implement planning decisions for conserving and recovering special status species" (p. C-4). For Fish and Wildlife, the handbook lays out land use plan and implementation decisions that Designate priority species and habitats, in addition to special status species, for fish or wildlife species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age. Identify desired outcomes using BLM strategic plans, state agency strategic plans, and other similar sources (p. C-6). Describe desired habitat conditions and/or population for major habitat types that support a wide variety of game, non-game, and migratory bird species; acknowledging the states' roles in managing fish and wildlife, working in close coordination with state wildlife agencies, and drawing on state comprehensive wildlife conservation strategies. Identify actions and area-wide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships (p. C-6). In coordination with state wildlife agencies, identify site-specific actions, such as riparian fencing, guzzler placement, furls management, etc., needed to manage ecosystems for all species and habitat for special status species. Identify specific measures to conserve and enhance EFH (p. C-7). These components provide a key opportunity for protecting those already wide-ranging species valued as key resources by the public. Defenders recommends that the agency fully incorporate each of the potential decision options laid out here in the Rock Springs RMP.

Peter Nelson—Defenders of Wildlife: The successful inventory of wildlife for the purpose of identifying special status species is vital for the development of effective land use plans. The lack of necessary information on the status of species within the planning area can also have implications for the NEPA process, which requires the use of the best available information. Defenders recommends that the Rock Springs Field Office fully commit to participating in the needed surveys to complete the list of sensitive species and that the Rock Springs RMP be amended in the future as new sensitive species come under the protection of the SSS policy.

John Spezia: There is a need for core wildlife habitats and connecting linkages and maintaining migration corridors, so wildlife populations have freedom to move between key habitats.

George Wuerthner: As a former BLM biologist and a contract biologist who did a biological conservation plan for the Greater Yellowstone Ecosystem, I also urge you to maintain core habitat for

wildlife with adequate corridors linking these core zones. The Heart of the West is a good starting point for such planning.

TRAVEL AND TRANSPORTATION MANAGEMENT

Kent Connelly—Coalition of Local Governments: All existing public access on and across public lands must be retained unless it is determined otherwise through consultation with the appropriate Cooperators and the counties. The plan must make clear that management actions apply only to BLM-owned and administered roads and trails. Further it must provide that any road- or trail-related management must be coordinated with the appropriate county. Road ownership issues must be resolved before transportation planning in order to limit confusion and future litigation. The history and land ownership pattern in the project area makes this condition especially important. A significant number of the roads and trails in the project area date to homestead era and provide access to ranches and communities as well as recreation. These remain public roads over which BLM cannot exercise jurisdiction. BLM lacks the authority to close such roads or to require their reclamation when used for energy development. County roads and all known existing roads regardless of claimed ownership must be displayed on maps in the RMP/EIS. A transportation plan should be developed in conjunction the RMP. If not, the RMP should require that such plan must be developed within five years of the plan implementation. Plan must provide for reasonable access across public lands to landlocked private and state lands. Proposals for development projects must include transportation plans that clearly identify road ownership, standards to which roads will be constructed or improved, plans for dust control, and disposition of the road at the end of the project. All existing stock driveways must be identified and included in transportation planning.

Joshua W.D. Coursey—Greater Little Mountain Coalition: A review of all existing roads and well pads in the GLMA should be completed to consider use of existing infrastructure when developing leases.

Nada Culver—The Wilderness Society: (1.) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective; therefore, travel planning must be coordinated with recreation management planning. (2.) Prior to conducting an inventory or designation of routes, BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users. (3.) BLM should use a legal definition of “road” when designating routes. (4.) BLM’s consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users. (5.) Where BLM presents a baseline travel system, it must present route maps in a responsible manner that does not legitimize or misrepresent the official status of the existing network of unauthorized ways/routes. (6.) BLM should include a detailed closure and restoration schedule in the plan. (7.) BLM should include and implement a monitoring plan. (8.) BLM should include and implement education and outreach in the plan.

Nada Culver—The Wilderness Society: (1.) Approve construction of new or additional trails only after the following conditions have been met: (a.) The decision to approve the trail(s) has been authorized under a site-specific EA or EIS that analyzes the site specific environmental effects of the proposal. (b.) The proposal would further the goals and desired future conditions (DFCs) identified by the agency. (c.) Priority implementation of effective on-the-ground closures (i.e., barriers, gates, berms) and restoration work (i.e., ripping/seeding, decommissioning, re-contouring, re-vegetation) has been completed and adequate funding and grants, partnerships/volunteer commitments, staff time allocations has been secured and employed. (d.) Implementation of all necessary signage (for closed and open routes) has been fully installed and adequate funding and staff/volunteer time for installment has been committed to. (e.) The proposal is sponsored under a partnership agreement that includes a plan for securing the necessary funds and/or volunteer commitments to construct and maintain the trail to accepted standards. (f.) The proposal is accompanied by long-term commitments, and stipulations and thresholds are agreed to that if surpassed, corrective management actions will be taken to protect resource health. (2.) A significant factor in approving new trails depends on the ability to maintain existing trails to agreed standards. With

the participation of cooperating partners, develop accepted standards and guidelines for constructing and maintaining new and existing trails. (3.) With the participation of cooperating partners, establish a system and procedures for monitoring trail conditions and performing necessary maintenance work. (4.) Continue and strengthen long-term partnerships with motorized user groups for the purposes of maintaining existing trail networks.

Nada Culver—The Wilderness Society: BLM should also create comprehensive travel and recreation management goals and designate routes accordingly.

Nada Culver—The Wilderness Society: Recommendation: BLM should address travel management on a landscape-level by evaluating the impacts of all roads in the planning area and tailoring its management prescriptions to account for and mitigate the landscape-wide impacts of these roads in conjunction with the objectives of the RMP.

Nada Culver—The Wilderness Society: Recommendations: BLM must complete comprehensive travel management concurrently with the RMP process. The RMP should also identify priority areas for implementation of the travel plan.

Nada Culver—The Wilderness Society: Recommendations: BLM must design a travel plan that minimizes conflicts among users and damage to natural resources. New open areas should not be designated, and current open areas should be reevaluated to ensure that they are located and bounded to meet the minimization criteria and limited to a reasonable size for purposes of BLM management and enforcement.

Nada Culver—The Wilderness Society: Recommendations: BLM should designate management zones in the manner proposed above to help guide the comprehensive travel and transportation management process, as well as other management decisions and prescriptions in the Rock Springs RMP.

Nada Culver—The Wilderness Society: Recommendations: BLM should identify both existing restrictions on motorized access and other areas that can be damaged by motorized use on all maps used in travel planning. User-created routes should be distinguished from legitimate roads on travel planning maps, and, where they were created illegally, should be excluded from the baseline inventory.

John Emmerich—Wyoming Game and Fish: We recommend enhanced enforcement of illegal vehicle use on WSAs be instituted. Road closures into these areas should become permanent gated structures rather than carsonite signs that are easily broken and/or removed.

John Emmerich—Wyoming Game and Fish: We recommend the BLM commit to travel management planning throughout the resource area. We also suggest current existing roads not be used as a basis for future decisions, but that inventory of existing roads and analyses occur that eliminate duplicative and adjacent roads. Significant numbers of unpermitted, pioneered roads occur across the resource area, many of which are duplicative and unnecessary for adequate public access. This contributes to a general lack of security habitats for wildlife, especially for wild ungulates, in many areas within the resource area. Specific areas that should be addressed are the slopes of Cedar Mountain, which have become inundated with unpermitted roads during the past 20 years.

John Emmerich—Wyoming Game and Fish: We recommend the RSFO adopt winter vehicle closures in that portion of the resource area north of WY 28 and east of US 191. Additionally, this area and that immediately south and east should be considered for special designation due to its importance to big game and greater sage-grouse.

Wyatt Hanks: No more closing of existing roads or areas (absolutely NO wilderness or WSAs).

Jim Hissong—Upper Bear River Trout Unlimited: Do not further develop roads within the Trout Creek drainage. Leave them as OHV roads, not further graded or paved.

Dick and Judy Inberg: Eliminate ALL off-road vehicle travel.

Clair Kendall: Enforce the laws that are in place concerning areas that are limited do designated roads. ATVs and four wheel drives are going anywhere they want.

Nathon Maxon—Wyoming Outdoor Council: We request BLM to address the growing off-highway vehicle (OHV) problem. BLM need only look across the highway to the White Mountain area to observe one example of severe ORV-caused resource damage that occurs across the RSFO. To address this problem we believe that BLM should adopt an "open to designated routes only" travel management framework for the entire RSFO, address OHV use for non-recreation purposes, and prevent OHV use in WSAs. First, we feel that the RMP should include specific language that restricts all OHV use on BLM lands to designated routes even if all routes are not inventoried. Additionally, whether or not off-road OHV travel is conducted by a recreational user or someone during the course of other permitted activities, the result is the same—new trails are established, vegetation is trampled, wildlife is disturbed, and erosion problems begin. Finally, we also believe that the BLM should include specific language in the RMP that prohibits OHV use in WSAs—such language would help ensure reliable opportunities for solitude within WSAs and would permit law enforcement to ticket OHV users who tread upon lands within WSAs.

Erik Molvar—Biodiversity Conservation Alliance: Areas without roads serve as refugia for these sound-sensitive species, and the proliferation of user-created roads into pristine areas may threaten the viability of these species.

Erik Molvar—Biodiversity Conservation Alliance: In order to protect soils, vehicles should be limited to existing roads and trails.

Erik Molvar—Biodiversity Conservation Alliance: Off-Road Vehicle Management: (1.) All motor vehicles should be limited to designated roads and trails throughout the planning area. (2.) Designated routes will be limited to those which minimize damage to soil, harassment of wildlife, and conflicts with other recreational users in accordance with Executive Orders # 11644 (1972) and 11989 (1977), and 43 C.F.R. § 8340 et seq.

Erik Molvar—Biodiversity Conservation Alliance: The BLM's current policy restricting motor vehicles to existing roads and trails is a bit ambiguous: "Existing" is in the eye of the beholder; a wild horse or game trail might be viewed by some as an "existing" trail open to motorized use. Furthermore, a track created through illegal use becomes "existing" and thus open to subsequent users, which further increase the wear and entrenchment of the route. Thus, restricting motorized use to "existing" roads and trails has been a recipe for the proliferation of user-created routes, precisely the opposite outcome to what was intended by the regulation. Under the new plan, motorized use should occur only on designated routes throughout the planning area.

Erik Molvar—Biodiversity Conservation Alliance: While we do not oppose the maintenance of the ORV play area east of Sand Dunes WSA, it should not be expanded and other dune areas should be rigorously protected from ORV traffic and impacts.

Michael N. Rudoff: One of the most precious resources we have here in our area is literal unfettered access of tens of thousands of acres of public lands that can be used for all manner of recreation including

hiking, biking, camping, boating, fishing, hunting, and all sorts of off-road activities. I believe in keeping our public lands PUBLIC, with open access and a multi-use philosophy guiding ALL decisions to manage these areas. I am a careful, responsible user of these lands, and as such, I believe that there must be some degree of restraint in using our resources. While creation of new roads and access points is not necessary, the open access to already created ones must continue.

Lee Splett: Off-Road Use: A criteria should be developed to determine areas suitable for off-road use by ATVs and other vehicles. Special consideration needs to be given to potential erosion, stream contamination, and the effects of dust on grazing and wild life.

Larry Svoboda—EPA Region 8: The popularity of Off-Highway Vehicles (OHV) has increased dramatically and is expected to continue, due to population growth, advances in recreation technology, increased availability of information and improved access to remote areas. EPA supports efforts to address motorized use resource damage, monitoring issues, known user conflicts, and enforcement issues. EPA also supports the transition from unmanaged motorized recreation to restricted travel. Restricted or limited travel is necessary to ensure that resources are protected and that other non-motorized recreation is accommodated. Unmanaged OHV use on federal lands has resulted in unplanned roads and trails; erosion; damage to wet meadows, soils and stream channels; and increasing degradation of recreational experiences such as horseback riding and hunting. The RMP/EIS should provide a thorough analysis of impacts from OHV use. The analysis should include prevention or mitigation of adverse impacts from OHVs to soils, watersheds, vegetation, wildlife habitat, water quality, cultural resources and other assets of the planning and decision areas.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Recreational use - This area is highly valued for recreation, and should remain so. However, unauthorized use of the landscape, particularly off-road vehicle use, must be addressed through a travel management plan. I do not advocate closure of existing roads, but am firm sufficient access to the area be in place, and there is a need to maintain those areas that do not currently have vehicular access.

VEGETATION

Kent Connelly—Coalition of Local Governments: The plan should require that BLM, through coordination with local governments and conservation districts, develop an area-specific reclamation plan that describes how, when and to what standard reclamation will be accomplished. Such plan must clearly state when reclamation has been accomplished and provide for coordination with the affected parties, including conservation districts, grazing permittees, and landowners. The plan should provide for access and adequate vegetative treatment to meet the need for vegetation and habitat restoration and improvements contemplated in the various conservation initiatives currently being proposed such as the Wyoming Landscape Conservation Initiative. Habitat improvement and restoration projects must be designed to a standard that will create ecological sustainable habitats and not to create habitat to support a particular species or use. BLM should not consider special designations (e.g., Wild Lands) that would prevent a full range of vegetative treatments. Weed management plans must be coordinated with the county and conservation district and weed and pest boards. Weed management plans must be developed for proposed projects and analyzed and disclosed in the NEPA analysis. Managed livestock grazing should be recognized as a viable method of weed control. Activities such as surface disturbance, vegetative treatments, range and habitat improvements, chemical treatments, and fire suppression should be permitted in potential or occupied sensitive species habitat when it can be demonstrated that the proposed action would not adversely affect the plants. The plan must provide that vegetation be managed for livestock as well as wildlife and for sustainability. The need for reductions in forage use must be supported by peer-reviewed scientific and verifiable analysis, such as monitoring data. The RMP also needs to identify species creating the impact. Reductions or land management changes must be applied to the species creating the impact. The plan should not limit the plants used in reclamation to native plants. Other species should be considered when analysis determines that other plants would better serve as replacement habitats, forage or wind or erosion control and not prevent the eventual return of native species.

Joshua W.D. Coursey—Greater Little Mountain Coalition: Noxious weeds and invasive plant species can have a substantial negative impact on native vegetation and associated wildlife habitat. There should be specific measures developed to minimize the introduction and dispersal of these plants.

John Emmerich—Wyoming Game and Fish: Riparian Vegetation Management Actions on page 20 of the existing Green River RMP states: “Under this RMP, 75 percent of the riparian areas should, within 10 years, have activity and implementation plans in various states of implementation that will allow riparian areas to achieve or maintain proper functioning condition.” Furthermore, the RMP on page 20 states: “The next step beyond basic proper functioning condition of riparian areas is the achievement of desired plant communities.” Our assumption is that 75% of the riparian areas within the boundaries of the Rock Springs Field Office have had implementation plans established to allow achievement of proper functioning condition. If this has not occurred, this issue should be addressed during this RMP revision to ensure the 75% objective is met. The current RMP revision should also strive to establish and achieve an objective of 90% of all riparian areas within the boundaries of the Rock Springs Field Office boundary to achieve PFC within 10 years. The RMP should also establish achievable objectives and timelines for Desired Plant Community (DPC) objectives for key riparian areas and Desired Future Condition (DFC) objectives for associated key watershed landscapes. Based on our desire to ensure quality riparian and stream habitat exists for priority aquatic wildlife resources, we recommend the revised RMP include ecologically sound riparian community DPC and watershed DFC management objectives for BLM administered lands in the Currant Creek, Trout Creek, Gooseberry Creek, Sage Creek, Red Creek, upper & lower Marsh, Big Sandy, Little Sandy, and upper Biller Creek watersheds.

John Emmerich—Wyoming Game and Fish: The RMP should thoroughly address existing and new noxious and invasive plant species, should provide for tiered noxious and invasive plant treatment planning and implementation, and should provide the ability to adjust or restrict existing land uses to meet noxious and invasive plant management objectives.

John Hay, III—Rock Springs Grazing Association: In the checkerboard, typical reclamation practice, for many years, has been to adopt BLM requirements on private land. This simplified the reclamation effort for the project owner and its contractors. In the past several years there is increasing concerns that seed mixes and certain land treatments have proved unsuccessful and now there are miles, and thousands of acres, of invasive species, including Cheatgrass, Halogeton, White Top, etc. Current BLM policy is to avoid sagebrush landscapes, due to concerns for sage grouse, and to locate facilities to the salt sage flats and poorer soils. This policy is in conflict with reclamation standards and compromises ability to successfully reclaim disturbance to preexisting conditions. Restrictions for the use of non-native species have compounded the ability to prevent introduction of invasive species on poor soils. Best science and research, by US Department of Agriculture, has proved the need to use non-natives and to be aggressive to combat certain invasive species and to reclaim disturbance on sodic soils common to this area. The RMP should analyze the merits of short-sighted policies that preclude the use of non-native species that may allow greater opportunity to restore impacted habitats in the long-term. In short, the new RMP must focus on eradication, reclamation, and prevention of future exotic invasion. This is not just an issue of financing, but more importantly, an issue of will and enforcement. Rationale for a uniform treatment and seed mix across the checkerboard has been the difficulty to know when operations are on private or federal land. Today with GPS on the equipment, and land status database, contractors can determine their location within a few feet. It is now more practical to execute different treatments on private land if necessary to protect private resources. There has to be flexibility in BLM requirements regarding land treatments.

Darlene Jones: Reclamation of roads, creeks, vegetation, preservation of air quality, ground water quality, not to mention collateral damage to wildlife and existing businesses is mandatory with money held in escrow to complete in case of default. Once they have completed their use of the land, they must put it back to “similar to original condition” at a minimum. Commercial development must be severely limited because of the lack of water resources and the extremely slow recovery time for desert vegetation. Ex: if you cut a road, it takes a very long time to revegetate naturally. Bottom line in the West is that WATER is the Gold Standard. If it negatively impacts water and wildlife, I would most likely be against it, regardless of how much revenue it produces.

Clair Kendall: Remove the Tamarisk from the Salt Wells drainage.

Nathon Maxon—Wyoming Outdoor Council: Control and elimination of non-native plant species. (1.) Tamarisk Tamarisk (Tamarix spp.) invasion is beginning to occur within the RSFO. While walking along Dry and Cottonwood Creeks in the southwestern portion of the RSFO, I observed several small (2 to 4 feet tall) tamarisk plants. BLM must analyze management prescriptions and allocate immediate and ongoing resources to ensure that tamarisk does not become the problem it has become in the southwestern United States. (2.) Cheatgrass: The spread of cheatgrass (Bromus tectorum) in native plant communities causes severe ecological harm and presents a pressing modern problem for land managers. Once a stand of sagebrush is occupied by cheatgrass the likelihood of severe wildfire increases. A severe wildfire removes sagebrush and generally begins a cycle where cheatgrass grows and burns, each time resetting vegetative succession by eliminating native plants that may have begun to establish. We believe that BLM must incorporate the most current science-based management prescriptions to address this issue. Management changes may be needed, and failure to address this problem could lead to far greater problems over the long term. We believe that proper livestock management, proper reclamation standards, and minimizing surface disturbances will help to sustain native vegetation and will allow native

vegetation communities to successfully compete with cheatgrass. Rock Springs BLM need only look to slightly warmer and drier areas of Wyoming that have seen significant increases in cheatgrass to see what is at stake, especially if the climate becomes warmer and drier. A comprehensive study was undertaken to better understand what causes native sagebrush steppe communities to lose their resilience to cheatgrass. This study analyzed three sources of stress: water stress, heat stress, and herbivory stress. Water stress was found to vary by soil type, with sandier soils being less able to store water, thus leading to increased water stress relative to other soil types. Heat stress was found to vary by aspect with more southerly aspects exhibiting higher heat stress. Herbivory stress, measured by variable levels of grazing pressure, showed that increased grazing pressure leads to increased basal gaps (areas of exposed mineral soil) and decreased biological soil crusts. Because water and heat stress are essentially unmanageable and because both will likely increase as the climate warms, BLM must look at ways to manage herbivory stress to prevent cheatgrass increase. Grazing generally leads to decreased bunchgrass abundance and diversity, especially among decreaser species. Hoof action also reduces the coverage of biological soil crusts. As crusts and grass are removed, soils are exposed, and cheatgrass seeds are given opportunities to invade. Systems that can best repel cheatgrass infestations have a diversity of cool and warm season grasses and have intact biological soil crust. We hope that BLM will consider reducing utilization rates and changing seasons of use to ensure adequate growing season rest for native bunch grasses and prevent cheatgrass encroachment. We believe that BLM's standards and guidelines for grazing management may require this management approach, and we ask the BLM to assess cheatgrass management needs through the perspective of these standards and guidelines.

Nathon Maxon—Wyoming Outdoor Council: Many BLM-managed riparian zones throughout the RSFO do not have adequate cottonwood (Populus spp.) recruitment. We are concerned that in the near future, many perennial and intermittent streams will no longer have living locally adapted source trees for seed production. Cottonwood Creek, found along the extreme western edge of the RSFO, is one example and is undoubtedly representative of other streams where few if any young cottonwood trees can be observed within riparian corridors that were once flourishing with cottonwoods of all ages classes. Much of Cottonwood Creek's channel has been incised and in many places the old living cottonwood trees have been left stranded ten to twenty feet above the level of the contemporary stream channel. Causes of this down cutting and lack of recruitment vary, but upstream impoundments, water diversions, and grazing all may contribute. While BLM cannot control impoundments or water diversions, BLM can control grazing pressure to ensure that cottonwood saplings in this and other streams are not killed by grazers. BLM should also make provisions in the RMP that will allow BLM to continue and expand efforts to re-establish beaver throughout the RSFO. Beaver play an important role in riparian systems because they create conditions that store water and raise the water table which in turn creates conditions that are favorable for the expansion of woody plants like willow, aspen, and cottonwoods. These and other management options should be considered, analyzed, and pursued by BLM to ensure that Cottonwood Creek and other streams will not lose these important cottonwood stands.

Matthew H. Mead—Governor of Wyoming: Little Mountain Landscape. Invasive species - While numerous entities have made efforts to contain the spread of exotic species, particularly tamarisk (saltcedar), cheatgrass (Bromus spp), halogeton, perennial pepperweed (whitetop), and knapweed (spp), the lack of a concerted and coordinated focus on this issue has led to a dramatic loss of habitat and forage throughout the area. In particular, I am concerned that the BLM has not made this issue a significant priority. This RMP should address appropriate funding for the eradication of invasive species, reclamation of impacted habitats, particularly on rights-of-way and other lineal disturbances, and continued funding to prevent re-infestation. In addition, the RMP should analyze the merits of policies that preclude the use of non-native species that may allow greater opportunity to restore impacted habitats in the long term. The new RMP must focus on eradication, reclamation, and the prevention of future exotic invasion.

Erik Molvar—Biodiversity Conservation Alliance: Clearly, there is broad disagreement in the scientific community regarding the range of natural variability of sagebrush steppe ecosystems, and in light of this uncertainty, a conservative approach to sagebrush steppe is warranted, and radical alterations to sagebrush steppe distribution, plant composition, and architecture should be discouraged in the new RMP. We urge the BLM to adopt this conservative approach to land management in the sagebrush steppe habitats.

Erik Molvar—Biodiversity Conservation Alliance: Noxious Weeds: (1.) The BLM will work with other agencies to prevent the introduction of noxious weeds. (2.) In order to retard the spread of noxious weeds, the following steps will be taken: • Reduce the road construction associated with oil and gas development and other surface disturbance to the minimum practicable footprint. • Reduce grazing pressures where overuse is promoting the spread of invasive species. • Require that any fill material used on the Resource Area be free of non-native seeds or other noxious weed material.

Erik Molvar—Biodiversity Conservation Alliance: Only native species would be allowed for reseeding. Reclamation should take into account the vegetation community extant on the site prior to development, and re-create that mixture and distribution pattern of plants when reclamation occurs. The use of crested wheatgrass in seedings and reclamation should be prohibited. Topsoil should be reserved during every surface-disturbing activity, so that it can be replaced during the reclamation process.

Erik Molvar—Biodiversity Conservation Alliance: Sagebrush "control" also can have deleterious effects on nongame wildlife. Vegetation treatments such as prescribed burning and 2,4-D herbicide application had negative effects on Brewer's blackbirds (burning only), Brewer's sparrows, and sage thrashers, while green-tailed towhees and white-crowned sparrows were entirely excluded by such treatments (Kerley 1994). Due to negative impacts on sagebrush obligate passerines, sagebrush treatments should be closely scrutinized in order to minimize their ecological impacts. A decrease in grazing pressure may be more effective at reducing sagebrush density than costly and high-impact eradication programs. Overgrazing may increase sagebrush density, and in areas where this is occurring, a rest from grazing pressure can reduce sagebrush density. Wamboldt and Murray (1986) found that rest from grazing alone resulted in a 29% decrease in sagebrush canopy cover. In areas where sagebrush is perceived to be decadent, rest from grazing should be evaluated as an alternative to more heavy-handed methods.

Erik Molvar—Biodiversity Conservation Alliance: Sagebrush should be maintained as a valuable asset to wildlife, rather than eliminated like a weed.

Erik Molvar—Biodiversity Conservation Alliance: The new RMP should include measures to minimize the risk of weed invasion. The BLM must take a preventative approach to the noxious weed issue, rather than its past approach of remedial measures once weeds have already become established. This approach includes minimizing the extent of new road construction or reconstruction, reducing stocking levels when overgrazing is implicated in noxious weed invasion, and requiring that fill material is weed-seed free.

Erik Molvar—Biodiversity Conservation Alliance: There are absolutely no reliable data available for the Rock Springs Field Office on pre-settlement fire frequency or the landscape pattern of fire-driven habitat mosaics (see Fire in Sagebrush Steppe). Thus, proponents of this policy have no scientific backing for a campaign of widespread sagebrush eradication that would recapitulate the ecologically disastrous efforts West-wide in the 1960s and '70s. Such a campaign could cause habitat fragmentation on a massive scale and drive the sage grouse and other sagebrush obligate wildlife toward extinction.

Erik Molvar—Biodiversity Conservation Alliance: Thus, riparian areas of high biological concern should receive special protection under the new RMP, which should include explicit standards to manage these areas to achieve Properly Functioning Condition as outlined in the Rangeland Reform practices currently in force for all BLM lands. Thus, BLM activities with the potential to alter stream flows or retard flooding should be avoided.

Erik Molvar—Biodiversity Conservation Alliance: Vegetation Treatments: Sagebrush reduction treatments shall not occur within 3 miles of a sage grouse lek, within 1 mile of a sharp-tailed grouse lek, or on sage grouse or sharp-tailed grouse winter habitats.

Larry Svoboda—EPA Region 8: The effects of resource management activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the RMP/EIS. This is particularly important for the 10 WSAs and six ACECs contained in the planning area. Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; noxious weed management; any adverse impacts to BLM State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or wetlands and riparian zones. Important wildlife issues include: compliance with BLM, USFWS, or State Wildlife management objectives for natural gas mineral developments; wildlife mortality; crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, or BLM State sensitive wildlife or fish species. The RMP/EIS should include mitigation measures that may be undertaken to minimize or eliminate adverse impacts from the alternatives considered.

VISUAL RESOURCES

Aaron Bannon—National Outdoor Leadership School: Preserve the Nighttime Viewshed: At night, the Red Desert is a vast expanse of darkness, unparalleled in most of the lower 48 states. By requiring that oil and gas activities control light pollution, dark nights can be preserved. By using light shades and by requiring timers on rigs and wells so that unattended sites are dark at night, many concerns about light pollution can be successfully mitigated.

Aaron Bannon—National Outdoor Leadership School: Visual Resource Management: One of the few remaining landscapes where one can enjoy sweeping, uninterrupted views of a vast and unpopulated land is within Wyoming's Red Desert. While many BLM lands across the West have become peppered with oil and gas wells, development in the Red Desert has been less expansive. These open spaces draw visitors, and are an important aspect of Wyoming's heritage. The Rock Springs BLM has an opportunity during its RMP development process to preserve these remarkable viewscapes. In the attached map and GIS files, NOLS has attempted to define the viewshed it finds most vital to preserving the primitive backcountry experience. This viewshed extends south and southeast from Highway 28, east from the rim of White Mountain, north across the Big Empty, and west from Buffalo Hump Basin and across the Antelope Hills. Currently, most of this landscape that is outside of WSAs is given a Visual Resource Management Class of III or IV, which allows moderate to high changes to the landscape, with changes that may attract the attention of the observer, or may dominate the view. Class II areas, where the level of change to the landscape should be low and should not attract the attention of an observer, are limited to a buffer zone around existing WSAs, the Steamboat Mountain Management Area, and areas north of Honeycomb Buttes and the Oregon Buttes. Class I areas are limited to existing WSAs. NOLS encourages the BLM to consider expanding its VRM Class II management prescription to encompass a much greater portion of the Jack Morrow Hills and its surrounding area. Specifically, we ask that the viewshed outlined above, and in the attached map and GIS files, be incorporated into an alternative as VRM Class II.

Kent Connelly—Coalition of Local Governments: The assignment of a Visual Resource Management (VRM) class must be based on the on-site inventory, the resource use allocations made in the RMP, as well as adjoining landownership, current use and existing leases and other property rights. An inventory alone is not a valid basis to assign the class: it must be modified to conform to the land uses. Definitions of VRM classes and their appropriate application must be taken from existing visual guidelines. A VRM Class I should not be applied to a Wilderness Study Area as it is not consistent with provisions of the Interim Management Plan for such areas. H-8550-1. The IM providing for such classification is more than 11 years old and has never been renewed or put into a handbook. A VRM Class I or II must not be designated over areas with existing oil and gas leases unless such designation is already reflected in the current lease stipulations.

Nada Culver—The Wilderness Society: Recommendations: BLM must update its inventory for visual resources on all lands within the planning area. We urge BLM to prioritize completion of this inventory, as well as to keep the public apprised of the values identified by posting the VRI for public review prior to assignation of VRM classes. Updated VRM classifications should be incorporated into the new RMP to reflect the inventory and the new designations.

John Hay, III—Rock Springs Grazing Association: RSGA experience with the NEPA processes, and associated programmatic agreements, for several energy developments in the checkerboard exhibited a disregard for landowners and private property rights during the respective processes. Special interests and state agencies that appoint themselves as affected interests assume they have a right to insist on evaluation of private lands and have authority to invite the public to access them in regard to interpretation of cultural, historic, and scenic features. View shed analysis and landscape analysis that expands for a radius of 5, 10, and 15 miles outside the perimeter of a proposed project is beyond reasonable analysis when

BLM has no authority on the private lands included. Redundant view shed analysis of parallel projects is expensive and time consuming for project proponents and a nuisance for landowners to attend multiple meetings in that regard. Recommendations and techniques for this analysis must be conducted in a format that appreciates checkerboard ownership and the reality that private landowners can disregard the recommendations and chose to not participate in programmatic agreements.

Jim Hellyer—Hellyer Limited Partnership: On several occasions I have had the opportunity to discuss with Ms. Foster what I put forth as shortcomings of the mapping of visual classifications. In a general sense, this position is also applicable to other management categories such as right-of-way exclusion areas, historic landscapes, and habitat designations. A visual classification that paints a broad categorization of a large area and then leaves site-specific analysis to its own puts a project proponent in an unfair position. Essentially, the BLM does not show to the public at large an accurate representation of what the land status is in regard to the land status' ability to detract from a visual model, or to change uses independent of a BLM act. In other words, painting a broad Category Two classification across much of the planning area without considering the potential impact of the numerous pieces of private property on the visual classification leads to poor planning. It is poor planning because the public is presented an inaccurate view of what is truly on the ground, and consequently that same public forms a comment based on incomplete information. To better create a map from which the decisions are made it would be helpful if the data set used to create planning maps contained the private property. This is not that hard to do. For example, just as the BLM can readily insert into any map a circle representing a sage grouse Lek, so to could the BLM insert a circle around the private property. This visual enhancement of the land status would alert the viewer that visual classifications, habitat content… the associated expectations of experience, are subject to private influence. To continue this example: draw a circle one mile in diameter; place a 40 acre private tract in the middle; do this to all private property in the viewshed and then analyze the relationship and impact of all the circles to the visual classification at hand. At the open house in Lander it was suggested that putting the land status onto other layers of data would create a map that was too "busy." Perhaps that is the problem. The BLM draws a very simple map to avoid the unpleasant realities of a "busy" map because a busy map is less inclined to lead to further regulation. Now we arrive at the central point of the argument: A busy map will produce a conclusion that private property can affect the landscape and that private property owners should be recognized for their contributions to an area. Furthermore, a busy map would show the public at large that much of what they take for granted is there for the viewing experience provided the private land remains undeveloped. Again, for example, consider the cherry stemmed 40 acre private piece within the Honeycomb Buttes WSA. As BLM maintains, the Category One visual class comes from existing WSA guidelines, but the Category Two comes from a simplified planning process. If this piece of property, presently undeveloped, changes uses, then certainly the expectations a visitor has to the WSA and the actual experience would be different. So, to extrapolate from this WSA to the larger area around the WSA which is classified as Category Two we should conclude that if there are multiple private pieces scattered all over then certainly the overall experience would not match the expectation if development occurred. Therefore, when the BLM makes a broad categorical classification despite the known existence of private property it is making a planning error because it assumes the private land is not there when drawing the broad classification. Consider this: Our ranch is an agricultural business; our business model is based on raising calves which we grow from infancy to, say, 600 pounds; and specifically the model is built on long term plans such as estate planning, herd health and genetics, and financial management, as well as access to grass on the BLM. If one aspect of the long-term RMP effort is designed to limit our access to grass, or if the RMP is tortured by anti-grazing elements, then it stands to reason that our long-term business model will change. But our ownership of the land wouldn't necessarily change… our economic use of the land may change and this change could affect the look of things to come. Consequently, if the biology part of the RMP trumps the Range part of the RMP, then I suggest the Visual part of the RMP get ready for change.

Dennis Luszcz: Visual Resource Management: I would urge that the visual resource classification ratings for the entire area south of Highway 28 and east of highway 191 which contains South Pass, the Jack Morrow Hills and the seven wilderness study areas be upgraded. The area contains large areas of class I and II interspersed with areas classed III and IV. The entire area is of exceptional scenic and historic value and should be classed no lower than class II. This is particularly important in those areas seen from Highway 28. The viewscape between highways 28 and 191 and the Wind River Range needs to also be considered for upgrade in the RMP. The Wind River Range is one of the most scenic mountain ranges in Wyoming.

Erik Molvar—Biodiversity Conservation Alliance: Visual Resource Management: (1.) Lands within the viewsheds of National Trails and lands proposed for wilderness designation must be managed as VRM Class I. (2.) Land of VRM Class I and II should be closed to wind power development projects.

Phillip Schlagel—Anadarko Petroleum Corporation: BLM states that it is their responsibility to ensure that the scenic values of public lands are considered before allowing uses that may have negative visual impacts. While Anadarko understands BLM's responsibility for visual resource management (VRM) we are concerned that some entities are attempting to use VRM as a tool to preclude other resource development either at the planning stage or when reviewing project proposals. BLM should make it clear that visual resource management decisions are on an equal footing with other resource considerations. Management decisions for the various Visual Resource Management inventory classification identified in the RMP must give consideration to other factors such as recreational user days, mineral development potential, management and presence of other existing resource uses. VRM is a resource allocation process that should occur in concert with and not contrary to allowances for other resource uses.

Russell A Spencer—Azalea Oil Company, LLC: Visual resource management should not be unnecessarily restrictive in a fashion to disallow a Lessee to develop its oil and gas lease.

Larry Svoboda—EPA Region 8: Visual impacts associated with the proposed activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and operational activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or the potential to reclaim disturbed landscapes. The RMP/EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.

WATER RESOURCES

Aaron Bannon—National Outdoor Leadership School: Prevent Impacts to Water Resources: As water resources in the Red Desert are scarce for both humans and animals, the BLM should create adequate buffers for development around water features, including springs. Springs, and an adequate buffer zone around them, should be closed to leasing. The attached map and GIS data includes NOLS campsites in the JMH. These campsites are, by necessity, close to water resources and can serve as a good guide for where these buffer zones should exist.

Joy Bannon—Wyoming Wildlife Federation: Recommendations for groundwater and surface water: Provide a complete description of the subsurface hydrology with aquifer information. Identify all waterways and drainages. Stream or water quality should be a priority to maintain or be enhanced. With the fragile soils within the RSFO, disturbance can quickly erode the quality of waterways. An objective should be to improve or maintain riparian, ground and surface water quality and quantity. If energy development were to occur, the RS RMP should stipulate: The use of environmentally friendly hydraulic fracturing fluids. Produced water and disposal issues need to be analyzed. The operator should develop a monitoring system for detecting spills around the natural gas well pads and associated facilities. A complete and accurate assessment of the impacts (such as contamination and demands on water), including reasonably foreseeable impacts and baseline sampling, should be conducted to ground and surface water prior to project proposal approval. Conduct a full range of alternative actions for disposing produced water that include: treatment, re-injection, evaporation ponds, and discharge. Discussion regarding tank lining, leakage and spill prevention need to be evaluated. Identify landowners and other water users who rely on the groundwater resources that will be impacted by the proposed development. Mitigation measures need to also be identified and provided.

Steven Brutger—Trout Unlimited: TU would like the BLM to include watershed management as one of the planning issues considered in the revision process. The significance of the watersheds and riparian areas within the Rock Springs resource management area cannot be underestimated. Much of the resource area contains groundwater recharge areas, springs, and sustains important critical habitat for sensitive cold water fish species. New challenges in water quality and quantity faced by this field office require stronger water quality planning efforts. Increases in aquatic invasive species, oil and gas exploration and development, expansive research and exploration in renewable resource development, the advancement in oil shale development, carbon sequestration projects, coal gasification, and other new energy research endeavors places unknown and often direct burdens upon the hydrological assets unique to this area. Existing and future coal and trona leases and their associated development also impact the water resources for this area. Finally, recreational use of the resource areas must be included in the watershed management discussion, as increases in the outdoor recreational use of the RS field resource area directly impact the watershed landscape. All of the above activities can impact the watersheds and associated quality through sedimentation and erosion from current and increasing number of roads, surface and subsurface contamination from oil and gas development's industrial activities, loss of cover vegetation in a semi-arid environment, and an increased burden on water resource uses. Specifically, TU recommends the following watershed management criteria to be included in the RMP: Create a specific Watershed Management section that is separate from Soils Management (as completed in the 1997 R_MP). TU makes this recommendation based upon the significance of the watershed to all affected landscapes. This section should include wetlands, floodplains and riparian areas as these areas are often directly affected by watershed management actions and can be impacted by sediment loads, subsurface and surface disturbances. Continue the 1997 RMP's area-wide monitoring plan to determine sources of water pollution; however, this plan should be further developed to identify specific locations, monitoring expectations, results, and resolution parameters. Water impacts due to abiotic threats should also be discussed in the revised RMP and include updated management restrictions that protect Wyoming's

waters. Water quality degradation, flow reduction impacts, energy development, and impacts from droughts and/or floods should all be part of the discussion under water issues.

Kent Connelly—Coalition of Local Governments: Structures and facilities may be built within flood plains, wetland or riparian areas when determined that they will not adversely affect the function of these lands. Wetlands management will be limited to those areas shown to have a nexus to interstate water bodies. Discharge of produced water to public lands, including stream channels and uplands should be permitted when found to be beneficial to other uses. Development within the 100-year flood plain should not be prohibited if such activity can be designed so as not to interfere with the proper function of the flood plain. FEMA maps should not be used to delineate the 100-year flood plain as there are often areas within these maps that have elevations above the flood plain. Alternatives should provide for identification and allow development of these areas if necessary. Flood plains should not be avoided when such avoidance would create additional surface disturbance. No management actions should be proposed that prevent full use, protection and enjoyment of existing water rights. This includes access to points of diversion facilities and delivery systems. All access to these attributes must be economically and technically feasible. No management actions should be proposed that would prevent treatments to rehabilitate or enhance watersheds on which water rights exist.

Michele and Robert Irwin: Water: This region also contains within it the dammed section of the Green River and the resulting unnatural reservoirs of Fontenelle and Flaming Gorge. Within the scope of the RMP, the BLM should work with the Wyoming Game and Fish Department and the Bureau of Reclamation to ensure that a long-term plan is in place to restore the river to a more natural and sustaining ecosystem, while ensuring the needs of downstream users.

Brian L. Kelly: Ground water resources need to be protected for future use from fracking contamination and the potential contamination from carbon sequestration.

Erik Molvar—Biodiversity Conservation Alliance: Activities that contaminate waters, whether point sources such as coal bed methane discharge points or nonpoint sources such as agricultural runoff, must be avoided.

Erik Molvar—Biodiversity Conservation Alliance: The BLM must prevent impacts to both the quantity and quality of groundwater in order to preserve ecosystem and economic values such as well waters, springs and seeps, and inputs to stream systems. In the desert environment managed by the Rock Springs Field Office, the availability of surface- and groundwater is perhaps the linchpin holding the entire ecosystem together.

Erik Molvar—Biodiversity Conservation Alliance: The BLM must take a hard look at maintaining aquatic ecosystems from top to bottom. This should include monitoring of and concern for not only fish species of concern (discussed under Native Fishes) but also aquatic invertebrates and plants. Harding et al. (1998) reported that preservation of entire watersheds may be key to maintaining aquatic biodiversity, beyond merely protecting riparian buffer strips. The new RMP should include a comprehensive strategy for limiting impacts to aquatic systems, including numeric standards on levels of hydrographic change (through both depletions and additions), change in water quality (both turbidity and chemical composition), and aquatic indicator species that can serve as the “canary in the coal mine,” triggering changes in management activities before an ecological disaster can occur.

Erik Molvar—Biodiversity Conservation Alliance: Water Quality: (1.) The RMP must ensure compliance with all federal and state water quality standards. (2.) The RMP should detail the steps BLM intends to take to improve water quality in those stream segments that are not currently meeting state standards. Special attention is required for those stream segments on the state’s 303(d) list. These steps

should include, at a minimum, reducing the impact of livestock grazing on water quality by limiting livestock access to riparian areas; reducing the impact of timber operations on water quality by creating adequate buffer zones; restricting road construction and ORV use in riparian areas; and ensuring that produced water is either treated or re-injected. In addition, should the Resource Area contain stream segments that have been designated as Class 1 or Outstanding Waters, the RMP must ensure that there is no deterioration in water quality for these streams or stream segments.

Erik Molvar—Biodiversity Conservation Alliance: Water Quantity: (1.) The RMP should provide that BLM will pursue whatever mechanisms are available to it under federal and state law to preserve minimum stream flows necessary for wildlife habitat, fisheries, and recreation. These mechanisms include conditions on the issuance of rights-of-way for water projects on BLM lands, reserved water rights, and state instream flow protections.

Russell A Spencer—Azalea Oil Company, LLC: Known aquifer areas should be delineated to identify potential restrictions. This is of particular importance to holders of existing oil and gas lease rights.

Lee Splett: Water Resources: Specific actions for the protection of the water resources must be incorporated in the document. A prohibition of a direct connection to water wells, streams, lakes and other water sources so as to prevent backflow should be a part of the document. An example is the water takeout site developed on the Green River at Fontenelle due to condensate contamination of the river by water trucks overflowing after having hauled condensate or other material. Another example is the well contamination due to backflow from reserve pits which occurred near Pinedale. Provision should be made for the improvement of streams, lakes, springs and other water sources as opposed to maintaining the status quo. All streams, either flowing or ephemeral, should be reviewed for increased storage potential and the preservation and improvement of riparian areas.

Larry Svoboda—EPA Region 8: EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity, and are critical to the protection of designated water uses. Possible impacts on wetlands include damage or improvement to: water quality, habitat for aquatic and terrestrial life, channel and bank stability, flood storages groundwater recharge and discharge, sources of primary production, and recreation and aesthetics. Road and pipeline construction, grazing, land clearing and earthwork generally include sedimentation and hydrologic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, are important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are “wetter” than adjacent uplands. Riparian areas increase landscape and species diversity and are often critical to the protection of water quality and beneficial uses. EPA believes wetlands and riparian areas should be afforded the highest level of protection. We encourage BLM to identify wetlands in the planning area and implement appropriate mitigation. For energy and mineral development, BLM may consider protecting wetlands by closing certain lands to leasing or through the use of No Surface Occupancy (NSO) stipulations. For travel management in the planning area, EPA recommends BLM give preference to routes that do not have sensitive soils, wetlands, stream crossings, critical habitat, meadows, etc. EPA encourages BLM to identify wetlands in the planning area and implement appropriate mitigation. We suggest BLM require delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before any activity occurs, so efforts may be made to protect them. We recommend establishment of wetland and riparian habitat 100-foot buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas. Due to the time it can take to adequately reclaim some disturbed wetlands, EPA suggests BLM require mitigation of wetland disturbance during the project operating time and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance or even prior to project construction, if possible. The RMP should specify general mitigation requirements and require any specific projects to

generate a wetland mitigation plan. EPA recognizes the challenges facing BLM in analyzing, understanding and ultimately managing wetland resources in planning areas that cover vast areas of Wyoming. Nonetheless, the RMP/EIS should address generally the expected impacts to wetlands. More importantly, the RMP/EIS should describe specifically how wetlands will be identified, avoided, or ultimately mitigated at the project-specific level. In order to illustrate effects to wetlands in the area. EPA recommends the EIS specifically include the following analyses or descriptions: maps, including wetland delineation and regional water features; wetland delineation and descriptions including wetlands-function analysis if there is any potential that the project will cause impacts; detailed analysis of the direct, indirect and cumulative impacts to all wetlands in the system, which includes those that are immediate, directly impacted, or potentially hydrologically impacted but spatially removed from the actual activities (EO 11990, Protection of Wetlands); and potentially adverse impacts to aquatic resources from reasonably foreseeable development.

Larry Svoboda—EPA Region 8: EPA recommends the RMP/EIS analyze the potential impacts to groundwater, drinking water, and irrigation waters. It is important to generally characterize surface water and groundwater resources and their connected uses in the potential leasing area early in the planning effort, including municipal drinking water supplies (groundwater, surface water and springs) and private groundwater well uses. Disclosing current and anticipated future water use is most appropriately done during the planning process and prior to leasing in order to determine if there are potential impacts. EPA does not believe that deferring this evaluation to the site-specific well reviews provides a complete overview of potential cumulative environmental impacts to surface water or aquifers from leasing for oil and gas development. In addition, the RMP/EIS should identify all relevant, reasonable mitigation measures to protect these water sources even if they are outside the jurisdiction of BLM. EPA's more specific recommendations on surface and groundwater are included in the enclosed "Detailed Comments." The EPA recommends the RMP/EIS include a description of surface and ground water resources, as both are essential to understanding the potential effects of any management alternative. In addition, the EIS should analyze potential impacts to surface water, groundwater, and existing and potential drinking water. Impacts to consider include: water quality, quantity, and any adverse change to current water quality of the any rivers, streams and their tributaries. No Surface Occupancy (NSO) lease stipulations may be appropriate to protect current or potential drinking water sources. For leased areas, Best Management Practices (BMPs) and mitigation measures should be identified to protect these water resources and incorporated into the alternatives under consideration. Surface Water: The RMP/EIS should clearly identify and describe water bodies within the analysis area which may be impacted by resource management activities, including any Clean Water Act (CWA) impaired or threatened water body segments within or downstream of the planning area. EPA suggests the RMP/EIS include a map of watersheds and water bodies within the planning area to help convey their relationship with project activities. Additionally, the EIS should include a summary of the best available water quality monitoring data in the planning area. Should CWA impaired or threatened water body segments occur within or downstream of, the proposed project area, the EIS should describe how the proposed action might affect these water bodies, particularly the water quality parameters causing the CWA listing. Proposed activities in the drainages of CWA impaired or threatened streams should not cause further degradation of water quality and should be consistent with the State's Total Maximum Daily Load developed for the listed water body. Mitigation or restoration activities should be included to reduce existing sources of pollution to offset or compensate for pollutants generated during planning activities. The RMP/EIS should also disclose the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, stream bank vegetation, and riparian habitats. Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation. Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well

as its sensitivity to further impacts. Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.

Larry Svoboda—EPA Region 8: Groundwater Protection: The planning process provides an opportunity to better understand and protect important groundwater resources. EPA recommends the RMP/EIS disclose identified groundwater aquifers, critical recharge zones, and current and potential future underground sources of drinking water (USDWs). Based on the impact analysis, we recommend BLM identify goals, management actions, and broad mitigation measures that can be implemented to protect groundwater as resources are developed in the planning area. As a cooperating agency, EPA would like to work with BLM towards the development of these goals, actions, and mitigation measures. While numerous land management activities can impact groundwater, EPA is particularly concerned about impacts from energy development. Leasing of fluid minerals should not be undertaken without a good understanding of the existing groundwater resources and use. EPA recommends provisions for groundwater protection be identified and incorporated prior to the leasing phase. Groundwater quality and depths of aquifers as well as critical recharge zones should be disclosed, if available. This information is necessary to provide guidance to operators as to future requirements related to setting surface casing, intermediate casing strings and cement, as well as other design features to protect groundwater. These requirements need not be identified on an individual well basis but could be generalized in order to inform future operators. For example, protecting deep aquifers to thousands of feet may require multiple intermediate casings and cementing to prevent aquifer contamination from fluid and gas migration from deeper zones. If groundwater hydrology and water quality are not well defined, BLM should identify this information gap in the RMP/EIS in order to set a stage for appropriate stipulations or conditions of approval prior to development (i.e., the first well in each section would be required to drill a surface hole and log the hole prior to setting casing and cement to determine water quality and the depth of useable groundwater). Groundwater baseline monitoring may also be necessary to identify the depths of aquifers that are used or could be used in the future for drinking water (USDWs). EPA understands that providing specific conditions of approval for each individual well during a planning decision is not feasible or appropriate. However, we suggest BLM consider developing a general framework under which operators would be expected to lease and operate. Examples may include: NSO in areas where groundwater is known to be extremely shallow and is currently being used as a source of private drinking water supplies; a general well design requirement to set surface casing and cement to a specific formation or depth if there are aquifers at depth that need protection; or a requirement for an intermediate string of casing and cement may be appropriate in the event of encountering very deep aquifers. If shallow fluid minerals are being leased, it is extremely important to have a full understanding of the production formations as well as the overlying aquifers to be able to determine if they can be protected from fluid mineral development. Well stimulation such as hydraulic fracturing should also be considered since the majority of oil and gas wells undergo this process to improve production. EPA is particularly concerned about shallow hydraulic fracturing in areas where USDWs exist. EPA also suggests BLM consider the groundwater policy recently published by BLM Utah for “Protection of Ground Water Associated with Oil and Gas Leasing Exploration and Development” (IMNo. UT 2010-055). This is an impressive step forward in enhancing BLM’s existing process for the continued protection of all usable ground water zones. (Useable groundwater is defined as groundwater zones (< 10,000 mg/1 TDS). EPA can provide a copy of the IM, upon request. Groundwater Monitoring and Mitigation EPA recommends BLM identify at the onset of the NEPA decision process what level of monitoring is expected of the current and future lease holders. A specific comprehensive monitoring plan and program to track groundwater impacts as drilling and production operations occur should be included in any future project level EIS or leasing decision. It should generally be expected that a monitoring program will be required of the operators in the leased areas. The “Regional Framework for Water-Resources Monitoring Related to Energy Exploration and Development” developed by BLM may also inform the process when considering how to provide

information for an adaptive management process concerning monitoring and making adjustments to or mitigating activities throughout the life of a project.

David Waterstreet—Wyoming DEQ/WQD: Both the BLM and WQD have responsibility for protecting water quality; however, the mechanisms for doing so vary between the two agencies. The WQD has sole primacy for enforcing Wyoming Water Quality Rules and Regulations, including permitting of most produced water disposal. However, the BLM has the responsibility to ensure its authorized actions do not result in degradation of water quality or violation of Wyoming's Water Quality Standards. Therefore, the BLM must recognize and clarify this responsibility in the RMP.

WILD HORSES

Pete Arambel: Excess wild horses should be removed from the BLM lands and HMA numbers should be maintained through their removal. The fertility control projects should be discontinued and that funding applied to gathering instead. The sanctuary effort should be discontinued and a sales-based horse program should be installed. All horses gathered from Federal lands can then be commercially sold.

Joy Bannon—Wyoming Wildlife Federation: WWF and NWF encourage more wild horse roundups in future years. Wild horse numbers have become excessive with more than 3,000 in Wyoming. To note, a significant portion of these wild horses are within the RSFO. With additional feral horse and burro roundups, the BLM can reduce not only their growing numbers but reduce the serious damage to riparian areas and rangeland.

Kent Connelly—Coalition of Local Governments: Wild horses must be managed consistent with the 2003 decree in State of Wyoming v. Department of Interior and the 1979 Wyoming federal district court order in Rock Springs Grazing Association v. Andrus directing BLM to remove all wild horses within the Checkerboard except a number to which RSGA agrees. Herd management plans must be developed to ensure compliance with the decree. To date, BLM has not complied with either court decree. Current management practices are not designed to bring BLM into compliance. The adverse impacts on rangeland resources and sage brush habitat compel BLM to make significant changes forthwith.

Shirley DeLambert: We would like to see the wild horse herd controlled better.

John Emmerich—Wyoming Game and Fish: Given the potential for continued impacts to wildlife habitats on this landscape, we encourage the RSFO to consider adequately adjusting wild horse herd management objectives to the lower end of appropriate management levels in all HMAs within the resource area.

Jason Fearneyhough—Wyoming Department of Agriculture: Wild Horses: The WDA supports active management of wild horses within the planning area and in accordance to the Consent Decree dated August 14, 2003 between the State of Wyoming and the U.S. Department of the Interior and BLM. This includes removing excess horses from Herd Management Areas (HMAs) and adjacent public/private lands using selective removal strategy, managing the herd to the Appropriate Management Level (AML), collecting wild horse data (census) for appropriate future herd management, and administering fertility treatments. The gathering of wild horses ensures a natural ecological balance to the land and provides for the protection of rangeland resources. We do not support the expansion of HMAs boundaries in the RSFO or increasing the AML to accommodate more horses. BLM must work closely with private landowners to utilize their knowledge of the land and identify locations of wild horses at the time of the gather. Impacts created by wild horse populations to all resources must be documented and fully analyzed in the planning process.

John Hay, III—Rock Springs Grazing Association: It is obvious the special interest groups, including Congress and the Administration, have no appreciation for the role of private landowners in the wild horse program. In practice BLM has been unable to keep the population within AML and agreed numbers. RSGA has no responsibility to continue to support their enjoyment and agendas by providing critical habitat for the wild horses at the sacrifice of RSGA resources. A recent announcement by BLM Director implies there is no commitment to control the horse populations to AML in the foreseeable future, despite court orders. RSGA has no choice but to reconsider the 1979 Agreement by allowing private lands to be included in the Great Divide, Salt Wells, White Mountain, and Adobe Town HMAs. The RMP will have to recognize that RSGA may vacate the 1979 Agreement and declare that all horses on the checkerboard are now in excess. The RMP will have to include alternative analysis accordingly.

Dennis Luszcz: Wild Horses and Grazing: Due to the value of this sagebrush ecosystem to native wildlife, increased grazing by wild horse populations and domestic livestock should be discouraged. Protection for riparian areas should continue or increased.

Erik Molvar—Biodiversity Conservation Alliance: Miller (1983a) found that wild horse migrations were keyed on water sources and ridges. Both cattle and horses in the Red Desert showed strong seasonal use of areas within 4.8 km of water sources, especially during summer (Miller 1983b). Thus, competition between these grazers near watering areas is likely. During severe winters, there may be direct competition between horses, cattle, and pronghorns in the Red Desert, all of which concentrate on windblown ridges and in sheltered areas with softer snow (Miller 1980). Wild horses are more winter hardy than domestic cattle; Miller (1983b) reported that during one severe winter in the Red Desert, hundreds of cattle died but only 10 wild horse deaths were recorded. It appears that competition between wild horses and livestock or wildlife has been overstated in some cases. Nonetheless, wild horse numbers should be kept at levels that do not threaten the viability of native wildlife or degrade rangelands.

Michael A. Smith—Renewable Resources Department, University of Wyoming, Dept. 3354: In examining your Feb 2011 brochure requesting comment and explaining the process leading to RMP, I find that rangeland management is only mentioned in conjunction with livestock. I object as this leaves readers with the impression that rangeland management only impacts or is only impacted by livestock. Nothing could be farther from reality as most of the other proposed planning issues concern rangelands, some very directly and more forcefully than livestock. I have always and continue to support management actions that maintain the overall quality of rangeland resources such as effectively managing feral horse numbers and promoting grazing programs that optimize forage and other resources for a variety of users. I generally do not support preservationist actions that presume that no use is better; frequently unintended consequences develop. Plant succession and unmanaged uses continue, frequently resulting in impacts to the resource value that was thought to be protected.

WILDERNESS, WSAS, AND LANDS WITH WILDERNESS CHARACTERISTICS

Pete Arambel: Special designated lands including Wild Lands and wilderness should not be used to deny access to anyone. In the past, wilderness designation has denied access to the elderly and infirmed among us. These lands can maintain their special characteristics through monitoring by the BLM and permittees and recreationalists, educating the public and limiting some ORVs.

Aaron Bannon—National Outdoor Leadership School: Wilderness Study Area Islands: A noted phenomenon in the Jack Morrow Hills is the presence of WSA "islands." The WSAs themselves are closed to leasing in order to preserve their wilderness qualities, but the land around and between them is generally available for development. Already, NOLS instructors have opted to avoid historic routes due to the deterioration of the natural landscape through the impacts of oil and gas development. The lands south of Steamboat Mountain are an example of destinations now generally avoided by NOLS horse packing trips. By dividing the JMH into three implementation management areas during the development of the CAP, the BLM attempted to resolve some of these conflicts. Area 1 is open to fluid mineral leasing with standard stipulations. Area 2 is open to leasing with stipulations that may affect such factors as the ability to mitigate impacts and to protect sensitive resources. Area 3 is closed to future leasing. This approach did much to improve the situation, especially between features in the central JMH. Areas to the north and south of Honeycomb Buttes, however, remain vulnerable to fluid mineral leasing, as do areas between Oregon Buttes and Steamboat Mountain and between the Steamboat Mountain ACEC and the Sand Dunes WSA. Areas south of the Pinnacles and Steamboat Mountain, which were not considered during the JMH CAP, are also available for leasing, which could impair future recreation use. When the Rock Springs BLM chose to lease parcels south of the Honeycomb Buttes, the inadequacy of the JMH CAP was made apparent. No consideration had been given to existing commercial horseback operations, a legitimate resource value. No consideration had been given to harmonious and coordinated management. Instead, one resource, backcountry horse travel, had been sacrificed for another, oil and/or gas production. No clause in the Special Lease Stipulation for any of the five leases contained any provisions to allow for historic horse packing outfits to continue operating. In fact, the existence of such operations was not even acknowledged. These parcels were, fortunately, deferred. NOLS encourages the BLM to revisit the implementation management areas established in the JMH CAP and to expand Area 3 so that it may provide undeveloped corridors north of the Honeycomb Buttes, between the Honeycomb Buttes and the Pinnacles, between Oregon Buttes and Steamboat Mountain, and between Steamboat Mountain ACEC and the Sand Dunes WSA.

Andy Blair—NOLS: Wild lands in a wild state are integral to the success of our organization (NOLS) and our mission.

Randy Bolles—Devon Energy Production Company, L.P.: BLM should also carefully consider whether or not wilderness characteristics are present during its inventory and its analyses of any citizen proposed wilderness characteristics areas. The BLM should carefully consider (1) whether or not the area is roadless and over 5,000 acres in size; (2) whether its natural character has been affected primarily by the forces of nature only; and (3) and whether or not the area provides opportunity for solitude or a primitive and unconfined type of recreation. Obviously if oil and gas leases exist within an area it cannot and will not meet these characteristics. The valid and existing lease rights in the area will necessarily prohibit the type of unconfined recreation necessary for a wilderness characteristic area. BLM should also recall that the Secretarial Order requires the agency to protect and honor the existing rights including valid and existing rights. See Secretarial Order No. 3310, Sec. 5 d.(3) (Dec. 22, 2010). When preparing its analyses for wilderness characteristics, the BLM should carefully ensure that all valid and existing rights are fully honored and protected. As part of its land use planning process, the Manual also notes that the

BLM should specifically examine local or regional economic dependence on resources in lands with potential for wilderness characteristics. BLM Manual 6302.l.C.4 (Rei 6-126 02/25/2011). As the BLM is aware, all of the local economies within the Rock Springs Field Office are highly dependent on mineral development including oil and gas development for the civility and prosperity of their economies. The BLM should not take any action which may jeopardize current or future employment in this area.

Randy Bolles—Devon Energy Production Company, L.P.: Despite language in the Secretarial Order and associated manuals requiring the BLM to place a high priority on protecting lands with wilderness characteristics, the BLM should not forget its multiple use and sustained yield mandate under FLPMA. The term "multiple use" is defined under FLPMA specifically including utilizing public lands for their mineral resources in order to meet the present and future needs of the American people. 43 U.S.C. § 1702(c). BLM's second goal under FLPMA, providing for a sustained yield, "requires BLM to control depleting uses over time so as to insure a high level of valuable uses in the future." See Utah v. United States Department of the Interior, 535 F.3d 1184,1187 (10th Cir. 2008). Further, in FLPMA, Congress specifically recognized the importance of mineral development on federal lands by identifying it as one of the principal or major uses of the public lands. 43 U.S.C. § 1702(1). The BLM should not forget its multiple use and sustained yield obligations when preparing the Rock Springs RMP.

Randy Bolles—Devon Energy Production Company, L.P.: The BLM should utilize the revision to the Rock Springs RMP as an opportunity to comply with Secretarial Order Number 3310 to inventory lands under its jurisdiction for so-called wilderness characteristics. By preparing an inventory during the land use planning process, the BLM will more efficiently be able to document its compliance with Secretarial Order Number 3310 and, hopefully, prevent unnecessary delay when processing future applications. The manual prepared by the BLM to include Secretarial Order 33 10 notes that the BLM normally conducts wilderness inventories in the context of the land use plan and provides the BLM with authority to conduct inventories as necessary. See BLM Manual 6301.06.A.2 (Rei 6-126 02/25/2011); BLM Manual 6302.04.C.I (Rei 6-126 02125/2011). Devon also encourages the BLM to ensure that any and all citizen proposed wilderness areas submitted as part of the Rock Springs revision comply with all the requirements of the BLM Manual including a map of sufficient detail adequate to determine: (1) specific boundaries; (2) a detailed narrative that describes the wilderness characteristics of the area and documents how the information significantly differs from the information in prior inventories; and (3) photographic documentation of the area's wilderness characteristics. BLM Manual 6301.13.A.2 (Rei 6-126 02/2512011). If sufficient information is not presented by the citizen groups advocating the Wild Lands designation, the BLM should disregard the citizen proposal.

Steven Brutger—Trout Unlimited: TU supports the continued management actions and designations for the Special Designation Management Areas identified in the 1997 RMP. However, we would like to see stronger language on the consideration for mineral leasing in some of the special management areas. Some areas should require stricter leasing stipulations and conditions of approval due to the unique qualities of the designated areas. Further, monitoring and mitigation actions should be developed for each area with applicable accountability to the public on the conditions of the resource areas should mineral leasing activities occur. Continue the management direction for the Wind River Front Special Recreation Management Area (SRMA) as outlined in the 1997 RMP. Due to the increase in air quality concerns from current oil and gas activities west of this SRMA, TU supports the no leasing status for the Eastern Unit area. TU suggests that the Western Unit of the Wind River SRMA be reviewed as to whether continued leasing in this SMRA is appropriate. New circumstances in impacts to surface and groundwater resources, air quality, and wildlife impacts Trout Unlimited Scoping Comments Rock Springs BLM RMP Revision. For all designated Areas of Critical Environmental Concern (ACEC) TU recommends retaining all those identified in the 1997 RMP. Develop an alternative that encompasses 522,236 acres defined as the Greater Little Mountain Area (GLMA). The GLMA is situated east of Flaming Gorge Reservoir, west of Highway 430, north of the Wyoming border and south of Pretty Water Creek and the Sage Creek Road

(see Map Appendix A). Specific recommendations for the GLMA are also provided (Appendix B). Develop a Master Leasing Plan for the GLMA (Attachment 2: MLP proposal for the GLMA).

Kent Connelly—Coalition of Local Governments: All analysis supporting the creation of special management designations must be made available to cooperating agencies prior to the development of the alternatives. This information must be presented in EIS/RMP drafts for public comment. Any proposal to manage public lands for wilderness characteristics outside of the designated wilderness study areas violates FLPMA, the Wilderness Act, and the 2003 Settlement Agreement between Utah and the Department of Interior. Please see the CLG comments on the draft wild lands policy manuals for greater detail on the CLG objections to this unlawful policy.

Nada Culver—The Wilderness Society: Recommendations: In accordance with Secretarial Order 3310 and new BLM Manuals 6301, 6302, and 6303, BLM should designate identified Lands with Wilderness Characteristics as Wild Lands, provide interim protection for wilderness characteristics during the preparation of the Rock Springs RMP, and manage Wild Lands to protect their wilderness values. In addition, the BLM should acknowledge the many important values of wilderness characteristics identified above in the RMP's management alternatives and thoroughly analyze this issue throughout the planning process.

Nada Culver—The Wilderness Society: Recommendations: The Rock Springs Field Office should give due consideration to BCA's wilderness inventory and designate lands with wilderness characteristics as Wild Lands in the RMP.

Gary Dean: I am for supporting the Wild Lands policy that will specifically identify areas that are NOT developed or leased to provide these areas with future Wild Lands protection. I am urging you to include all Citizen Proposed Wilderness in the inventory for Wild Lands and any other areas unleased and undeveloped over 5,000 acres in size.

Gary Dean: Many WSAs are to be considered in this EIS and should be protected for future generations.

Nick Dobric: The BLM should re-inventory the lands for wilderness qualities based on the new Wild Lands policy. WSAs need to be managed to the highest standards to not jeopardize future congressional designation; this includes no motorized travel.

Lydia Garvey: It's highly inappropriate to destroy wilderness areas. Do your job: Protect Our Public lands, waters, economy, wildlife, and health.

Wyatt Hanks: My only complaints are the restrictions in place in the many Wilderness Study Areas, especially the closing of several existing roads (notably in the Adobe Town area) which limit access to visit and enjoy these areas, as well as the many areas that are off limits to drilling.

John Hay, III—Rock Springs Grazing Association: Wild land designations including ACECs, WSAs, Wilderness, and other special designations cannot be implemented in the checkerboard without being considered a federal taking of property rights. Alternatives that may include wild land designations, of any sort, in the checkerboard must be rejected. RSGA will not consider administrative solutions such as land exchanges or sale to create addition solid block ownership to facilitate wild land designations in the checkerboard. It is doubtful that Anadarko Petroleum, owner of the mineral estate, would honor or concur with such proposals or designations. Specifically, the area known as Adobe Town Expansion and now recognized by some as Rare and Uncommon, is within the checkerboard and the private lands will not be included in any special designations. RMP recommendations and alternatives must consider lack of legal access to reach public land. Wild land designations outside the checkerboard would place additional

recreation pressure on adjacent private lands and result in impacts to the very resources and scenic features intended to be protected.

Liz Howell—Wyoming Wilderness Association: For decades the Rock Springs Field Office has been managing lands based on heavy land extraction emphasis; now is the time for a change. One of the greatest of multiple uses of our public lands is Wilderness, which has been ignored, set aside or diminished in importance in the past. If the Rock Springs Field Office wishes to know what is "broken" and what needs to change in this RMP process, the Wyoming Wilderness Association strongly urges the BLM to undertake the consideration of wild lands as an equal and important multiple use. Development can continue, but on equal footing, and the preservation of undeveloped areas should be balanced equally with the energy development.

Liz Howell—Wyoming Wilderness Association: The Jack Morrow Hills Area is a land of extraordinary wild land values. It is a remarkable unspoiled portion of the northern Red Desert. This vast 620,000-acre undeveloped expanse of sagebrush habitat is home to five areas of critical environmental concern, six wilderness study areas, some of the most intact segments of the Oregon, California, Mormon and Pony Express pioneer trails, and numerous significant historical, archeological, paleontological, and native traditional cultural places. It is tremendously important habitat for large herds of mule deer, pronghorn and elk, and thus is a popular hunting area, and it is a stronghold for the sage-grouse. This substantial collection of "special values" should be borne in mind as this protest is considered. When taken into consideration for the Wild Lands Secretarial Order, WWA urges the BLM to find every block of land that fits the definition of LWC and note it in the initial inventory. Do not go back in time to the 1979 inventory and use any of those definitions.

Brian L. Kelly: The remaining wild spaces with wilderness characteristics under Interior Secretary Ken Salazar Order 3310 require an inventory of lands with these characteristics. Please slow down the RMP process to allow these wild lands to be inventoried under an administration that is free from influence and is trying to restore the balance to the management of public lands.

Laura Koval—Fidelity Exploration and Production Company: Fidelity is concerned with any Wild Lands evaluations that may take place during the RMP revision. BLM needs to conduct such analysis in the spirit of the Wilderness Act of 1964. Specifically, those Wild Land characteristics should be ... "an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value." We urge BLM to follow the requirements in the Instruction Memorandum 2001-191 during the current planning process. According to IM-2001 -191: "When a RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies. The BLM has the authority and discretion to condition its approval of proposed actions (APDs and other site specific activities) with reasonable measures (including relocation, redesign or delays in the proposed action) so as to reduce the effect of actions on other resource values and uses, consistent with the lease rights granted (see 43 CFR 3101.1-2). That is, BLM can use its authority and discretion to condition its approval of proposed actions to not constrain alternatives under consideration in a RMP revision or amendment consistent with the lease rights granted. Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office."

Forrest McCarthy: My wife and I make annual pilgrimages to hunt antelope in Jack Murrow Hills, rock climb on the Boars Tusk, bag peaks in the Oregon Buttes, explore fading two-tracks on our mountain bikes, or just wonder aimlessly and in awe through Honeycomb Buttes or Adobe Town. These landscapes are special and unique and must be protected. I respect Secretary Salazar for his appreciation of these special and important landscapes and his recognition that they need to be protected. I applaud the designation of many of them as "Wild Lands." I ask the Rocksprings BLM office demonstrate a comparable understanding and appreciation of the importance of these iconic landscapes to Wyoming's outdoor western heritage. Please respect Wyoming's remaining wild desert areas by offering them the highest levels of protection and exercise restraint when recommending the development of energy resources.

Cynthia Mohseni: Please protect the wild areas of the Red Desert now and for future generations. Please include all Citizen Proposed Wilderness in the inventory for Wild Lands and any other areas unleased and undeveloped. This landscape deserves long-term planning and vision for protection.

Erik Molvar—Biodiversity Conservation Alliance: Wild Lands Candidate Areas: There have been two distinct sets of citizens' wilderness inventory results that have been submitted to the BLM over the years. The first was the 1994 citizens' inventory, titled Wilderness at Risk, which was submitted in 1994 and to which the BLM has never responded. This inventory includes the Red Creek Badlands, Devils Playground, East Sand Dunes, and Red Lake units. The second series of inventories, conducted by Biodiversity Conservation Alliance, was more intensive and covered a subset of the wilderness-quality lands including Adobe Town, the Kinney Rim North and South units, Sand Dune, Buffalo Hump, Pinnacles, Parnell Creek, Joe Hay Rim, Big Empty, Honeycomb Buttes, Oregon Buttes Badlands, Whitehorse Creek, and Oregon Buttes units. In addition, the Wyoming Outdoor Council also submitted a citizens' wilderness inventory of approximately 5,000 acres for the Steamboat Mountain unit during the Jack Morrow Hills CAP process. We incorporate these attached citizens' inventories into our scoping comments by reference. So far, the BLM has formally responded only to the Adobe Town and Kinney Rim inventories, agreeing with BCA that 40,000 acres of land adjoining the current Adobe Town WSA does in fact possess wilderness qualities. Importantly, BLM responses to inventories in the Adobe Town and Kinney Rim units do not appear to have been conducted in accordance with the new Wild Lands guidance (and indeed, were not conducted in accordance with the Wilderness Inventory Handbook of the day in many cases). For example, in Adobe Town, Area B was disqualified because of a "road" that fails to meet BLM criteria for exclusion from wilderness. A small unit along the eastern boundary of the WSA was improperly disqualified because a gas well and its short access road extended into the unit; BLM policy clearly states that such dead-end routes can be "cherry-stemmed" out of wilderness to allow the lands surrounding them to be protected. Another small unit along the southwest edge of the WSA was improperly excluded because of several tiny (and pristine) private inholdings along its western edge. According to BLM policy, the agency was required to readjust the boundary to exclude these private lands, which would mean that the majority of the unit would qualify as wilderness. Pursuant to 5 U.S.C. § 555(e), we petition the BLM to conduct a formal inventory (or reinventory) process for these units will full public involvement to determine which lands possess wilderness characteristics under the new Wild Lands Secretarial Order. We have attached the most recent wilderness inventory documentation for each of these units. All lands identified to possess wilderness character should be withdrawn from future oil and gas leasing, regardless of the status of oil and gas leases in the area. The amount of leased land is a particularly poor predictor of likelihood of development, as evidenced by the fact that most current Wilderness Study Areas in the Rock Springs Field Office were predominantly leased at the time of their establishment, and very little drilling has occurred in these areas even though lessees retained the right to explore and develop oil and gas resources after the establishment of WSA, as long as their lease rights were current, and to hold those lease rights by production indefinitely. Pursuant to this request, we have attached the most recent citizens' wilderness inventory documentation to these scoping comments, and we incorporate these inventories by reference into the comments, requesting that BLM respond to them by

inventorying these lands under Secretarial Order 3310. These inventories include the following: Adobe Town, 180,910 acres, Attachment 12; Kinney Rim North, 128,000 acres, Attachment 13; Kinney Rim South, 125,562 acres, Attachment 14; Red Creek Badlands, 34,335 acres, Attachment 15; Devils Playground, 51,935 acres, Attachment 16; East Sand Dunes, 20,539 acres, Attachment 17; Red Lake Dunes, 20,098 acres, Attachment 18; Joe Hay Rim, 7,000 acres, Attachment 19; Big Empty, 34,120 acres, Attachment 20; The Pinnacles, 26,327 acres, Attachment 21; South Pinnacles Alkali Draw, 36,050 acres, Attachment 23; Parnell Creek Buffalo Hump, Attachment 24; Whitehorse Creek, 8,162 acres, Attachment 25; Sand Dunes, 32,089 acres, Attachment 26; Oregon Buttes Badlands, 6,494 acres, Attachment 27; Oregon Buttes, 8,700 acres, Attachment 28; Steamboat Mountain, 5,000 acres (inventory submitted to BLM during JMH CAP); Honeycomb Buttes, 78,907 acres, Attachment 29 (topographic maps have been provided showing the photo point locations for the more recent inventories), Attachment 30. In addition, we have attached GIS shape files of the citizens' proposed wilderness boundaries for your use; Attachment 31. Since these inventories were completed, some changes have occurred that may affect wilderness character for parts of these units as follows. In the Rock Springs portion of the Adobe Town unit, the Desolation Road project has been approved, with a primitive road constructed and one of two approved wells drilled on private checkerboard land. See Attachment 32 to view the impacts, and Attachment 33 to view the wilderness character that still remains in this part of the unit. In the Kinney Rim North and South units, a limited amount of new drilling and road construction has occurred in the vicinity of the Trail and Kinney gas units and in the area where the Pacific Rim coal bed methane project was approved. These changes will reduce the acreage of land possessing wilderness character in some parts of these units, while the majority of these units retain their wilderness character. A field reinventory is required to map the extent of impacts and where new boundaries should be located.

Erik Molvar—Biodiversity Conservation Alliance: Wilderness: (1.) All lands encompassed by citizens' wilderness inventories will be inventoried for Wild Lands designation as part of the RMP NEPA process and managed to protect their wilderness qualities. (2.) Citizens' proposed wilderness areas will be withdrawn from mineral leasing, coal leasing, and locatable mineral entry.

The Rev. Warren Murphy: I wish to say out front that I am certainly in favor of Secretary Salazar's "Wild lands" proposal and I feel much of the Red Desert must be carefully preserved as "wild lands."

Suzy Noecker—Wyoming Farm Bureau Federation: We are concerned about the de facto creation of wilderness areas through the new wildlands initiative set forth by Interior Secretary Salazar and would like to see a detailed discussion of the new policy manuals 6301, 6302, and 6303 and the procedures that will be used to evaluate these lands.

Cheryl Sorenson—Petroleum Association of Wyoming: We presume the Rock Springs RMP will be used to meet the requirements of Secretarial Order 3310, which directs BLM to inventory all public lands to determine whether they have wilderness characteristics in accordance with the recently released 6301 Manual and guidance documents. We believe it is best to conduct the inventory as part of the planning process as opposed to preparing a separate inventory and analysis. With respect to area inventories, we urge BLM to work closely with the State and county governments in determining which areas might qualify for designation as wildlands since there are other important factors to consider besides whether they meet the wilderness criteria (i.e., multiple-use activities). Simply because an area may have some aspects of wilderness character does not mean it should be set aside in perpetuity. For example, a wildlands designation would definitely create a conflict within an area already containing valid existing lease rights, well pads, access roads and other improvements. These types of situations must be avoided. With respect to citizen proposals for wildlands designations, we point out that all such nominations must include a detailed map of sufficient size to clearly show specific boundaries of the proposed area; a detailed narrative that describes the wilderness characteristics of the area and clearly documents how the information significantly differs from the information in prior inventories; and photographic

documentation of the area's wilderness characteristics. If sufficient information is not presented by the citizen groups advocating the wildlands designation, the BLM should dismiss the proposal.

Shay Westbrook—Yates Petroleum Corporation: We urge BLM to address the "Wildlands" policy in the Rock Springs RMP rather than addressing this issue separately from the RMP on a project-level basis. This approach is consistent with the approach taken by the Cody and Lander Field Offices as they go through the RMP revision process. Addressing Wildlands within the RMP will result in a more efficient, predictable and consistent application of the Wildlands policy. Re-evaluating and applying the Wildlands policy on a project-level basis (i.e., every time an operator applies for a permit) will potentially result in significant delays and place a significant burden on BLM staff and operators. Application of the Wildlands policy to areas already under lease is problematic as it potentially eliminates ongoing oil and gas development, thus infringing on the operator's rights as lessee. As such, we urge BLM to forego Wildlands evaluations and designations in areas already under lease. This will ensure protection of the lessees rights. Additionally, it is likely that areas already under lease, especially those experiencing oil and gas development, will not satisfy the requirements for a Wildlands designations (i.e., will not contain Wilderness Characteristics). With respect to area inventories, we urge BLM to work closely with the State and county governments in determining which areas might qualify for designation as Wildlands as there are other factors besides whether they meet the wilderness criteria that need to be considered, such as other multiple-use activities. Simply because an area may have some aspects of wilderness character, does not mean it should be set aside in perpetuity. For example, a Wildlands designation would definitely create a conflict within an area already containing valid existing lease rights. These types of situations must be avoided. With respect to citizen proposals for Wildlands designations, all such nominations must include a detailed map of sufficient size to clearly shows specific boundaries of the proposed area, a detailed narrative that describes the wilderness characteristics of the area and clearly documents how the information significantly differs from the information in prior inventories, and photographic documentation of the area's wilderness characteristics. If sufficient information is not presented by the citizen groups advocating the Wildlands designation, the BLM should disregard the citizen proposal.

WILDLAND FIRE MANAGEMENT

Pete Arambel: Drought and beetle kill have damaged much of the BLM woodlands in the district. Logging should be encouraged. Fuels management has to be pursued strongly. Wildfire in these areas will be devastating because of the fuel buildup. Continued sage brush burns would be beneficial to wildlife and grazing areas.

Kent Connelly—Coalition of Local Governments: Plan must provide that all fire plans and industrial and urban interface treatment plans be coordinated with local governments and conservation districts. Protection of critical and crucial habitats should have a high priority in such plans. BLM also needs to stay with current wildfire policy that calls for protection of both life and property. Green striping along roads and pipeline should be considered as beneficial in preventing catastrophic fire and for protection of important habitats.

Erik Molvar—Biodiversity Conservation Alliance: Fire/Fuels Management: (1.) Natural fires shall be allowed to burn unless and until they directly threaten human lives and property. (2.) Fuels reduction projects designed to reduce fire hazard shall be limited to areas within ¼ mile of existing buildings. (3.) Prescribed fire will be the principal tool of fuels reduction, not mechanical treatments.

Erik Molvar—Biodiversity Conservation Alliance: There is little evidence to suggest that pursuing a let-burn policy on the on BLM lands would lead to catastrophic wildfires. DeSpain and Sellers (1977) pointed out that during the early years of the let-burn policy in Yellowstone, most wildfires were small. This would likely be the case on the forests surrounding the Medicine Bow as well, particularly because the vast majority of stands on the forest are young and not fire-prone (Dillon et al. 2003), in contrast to the Yellowstone forests. Since stand conditions in this region make it less susceptible to extensive wildfire, now is an excellent time to initiate a natural fire policy, so that a more natural mosaic of stand ages and fuel loadings can develop before vast sweeps of the forest become acutely susceptible to fire.