



December 17, 2015

Bureau of Land Management  
Rock Springs Field Office  
Kimberlee Foster, Supervisor  
280 Highway 191 North  
Rock Springs, WY 82901

**Dear Ms. Foster:**

The Rock Springs Field Office encompasses 3.6 million acres of public land surface available to sportsmen and women for hunting, angling, hiking, camping, and recreating. We, the undersigned sportsperson groups, utilize the entire field office and six unique landscapes, in particular, are of considerable importance from a biological and recreational standpoint. Our six priority habitats include the Big Sandy area, the Jack Morrow Hills, Adobe Town, the Greater Little Mountain Area, the Red Desert to Hoback Basin mule deer migration corridor, and the Flaming Gorge area. We ask that you assign these areas strong conservation management prescriptions and that they be part of the Bureau of Land Management's preferred alternative.

This letter identifies and describes six geographic regions in the Bureau of Land Management's Rock Springs Field Office accompanied by recommended management prescriptions:

- Big Sandy
- Red Desert to Hoback Basin mule deer migration corridor
- Jack Morrow Hills
- Adobe Town
- Greater Little Mountain Area
- Flaming Gorge area

### **Big Sandy**

The Big Sandy area is a highly productive biologic landscape, home to the Greater sage-grouse (GSG), pronghorn antelope, elk, mule deer, black bear and moose. The Big Sandy and Sweetwater River also reside here and are popular among anglers. The Prospect Mountains are utilized regularly for big game and greater sage-grouse hunting and were identified as a potential off-site mitigation area for big game, specifically mule deer, during the Pinedale Anticline and Jonah field natural gas development.

### Resource Description

- Energy development potential varies by the type of mineral. The Wyoming Oil and Gas Conservation Commission's (WOGCC) interactive maps identify the Big Sandy area currently has

no active oil wells, no orphan wells, and no permits for oil, gas, or coalbed methane (WOGCC 10/2015, <http://wogccms.state.wy.us/flexviewers/unitmap/>). The area includes minimal natural gas activity – no producing wells, one spud gas well, around 10 P/A gas wells, and five idle gas wells. A small exploratory unit (permit WYW-176743X), roughly 480 acres, is identified on the Eden Ranch directly north of the Big Sandy State Recreation Area.

- Coal withdrawal area encompasses the southern section of the Big Sandy area, which also correlates with the historic trail.
- The Wind River Front Special Recreation Management Area (SRMA) includes the Sweetwater River, big game crucial winter ranges, and is a big game parturition area. The SRMA is managed as a “no lease” area for oil and gas development and a Rights-of-Way Exclusion Area.
  - Two SRMAs reside in the Big Sandy area – the Wind River Front and the Wyoming Continental Divide Snowmobile Trail
- Most of the Big Sandy area is within a big game crucial winter range. New scientific information depicts a 150-mile mule deer migration corridor that also runs through the entirety of this area.
- The Wyoming Game and Fish Department describe the Big Sandy area as an Aquatic Conservation Area under their Statewide Action Plan 2010 with several trout streams flowing here. The WGFD identifies the Big Sandy area as an Extremely Important Watershed with Flannelmouth Sucker (FMS), Bluehead Sucker (BHS), and Roundtail Chub (RTC) in the Big Sandy River, in Sculpin Creek and the Little Sandy River there are FMS and BHS.
- The WGFD also label the area as a Terrestrial Crucial Priority Area. In two smaller sections of the Big Sandy, the WGFD have identified a terrestrial conservation area and an enhancement priority area as well. The entire Big Sandy area is a Greater sage-grouse core area. The WGFD say that this area provides one of the greatest diversity of big game crucial habitat for antelope, mule deer, elk, and moose and numbers of wintering animals than any other large geographic area within the Rock Springs Field Office boundary. In addition, a number of sagebrush obligates species inhabit this area seasonally or year-round and represents some of the largest populations remaining within Wyoming.
- The Lander Cutoff Road is a Historic Trail. The Oregon – Mormon Trail, the Pony Express Route, and the Sublette Cutoff Trail are all located along the southern boundary of the Big Sandy area. “Parting of the Ways” and “Dry Sandy Swales” are also located within these historic trails. The WGFD remark that the area is a historically important landscape and should be left in a lightly touched state for future generations to enjoy.
- The Sweetwater River has potential to become a Wild and Scenic River with a variety of classifications – recreational, wild, and scenic – throughout the stretch of river inside the Big Sandy area.
- Sportsmen love this area and our membership hunt this landscape throughout the big game archery and rifle seasons. Elk, mule deer, antelope, moose, black bear, and Greater sage-grouse licenses are hunted.
- This area is largely intact with the most contiguous sagebrush steppe ecosystems west of the Continental Divide in Wyoming.

### Suggested Management

The Big Sandy area is host to extremely rich and diverse fauna and flora. Few public land locations throughout the United States enjoy this incredible make-up of biological diversity and recreational pursuits.

- This large, contiguous landscape should be managed with the focus of being conservative with development. The entire acreage is within a Greater sage-grouse core area. We support the Wyoming Executive Order 2015-4 and the management criteria set forth within;
- Big game crucial winter areas, parturition areas, stopover areas, and migration corridors should be identified by the BLM, recognized in the plan, and surface disturbing activities should be avoided;
- All trout streams, the Big Sandy River, the Little Sandy River, and the Sweetwater River need a 500 foot buffer from development to minimize sediment loading, erosion, and contamination;
- Maintain the ¼ mile or visual horizon (whichever is less) buffer as an avoidance area for surface disturbing activities. Also maintain the development of roads, pipelines, and powerlines to cross the trails only where previous disturbance has occurred;
- Maintain management objectives and stipulations for the Special Recreation Management Areas and the Special Management Areas; and
- Maintain hunting and angling access.

### **Red Desert to Hoback Mule Deer Migration Corridor**

The Red Desert to Hoback mule deer migration corridor is 150-miles in length. As the name describes, the mule deer begin their spring migration from the Red Desert area north of I-80 and just north east of Rock Springs in the Leucite Hills. The mule deer travel north from the Leucite Hills where three stopover areas exist onward to North Table Mountain and into the Steamboat Mountain Area of Critical Environmental Concern (ACEC) and the Steamboat Mountain Special Management Area (SMA). Mule deer move through the Jack Morrow Hills and Pacific Creek, over the South Pass Historic Landscape ACEC and eventually crosses highway 28 where they enter the Big Sandy area.

The Big Sandy segment is a sagebrush basin with two stopover areas. Hay Creek and Dry Sandy Creek are crossed before they enter into the Prospect Mountains. Little Prospect Mountain is also along the migration corridor. The mule deer cross Big Sandy River before they leave the Bureau of Land Management Rock Springs Resource Management Plan area and travel into the BLM's Pinedale field office district. This segment has the highest percentage of stopover areas for the corridor.

The Wyoming Oil and Gas Conservation Commission interactive maps identify that the Big Sandy and Red Desert segments of the Red Desert to Hoback migration corridor currently have no permits for oil, gas, or coalbed methane and no producing oil wells, idle oil wells or spud oil wells ((WOGCC 10/2015, <http://wogccms.state.wy.us/flexviewers/unitmap/> ). The landscape does have natural gas activity especially in the Red Desert segment where about 50 – 60 gas wells are producing and about double

that number of P/A gas wells.

#### Resource Description

- The corridor hosts 4,000 to 5,000 mule deer that use the same width corridor from year to year;
- The Rock Springs BLM field office contains 65 miles of the corridor, which includes two of the five corridor segments – the Big Sandy segment and the Red Desert segment;
- The corridor within the Rock Springs BLM field office includes crucial winter range for mule deer, elk, and moose. Core habitat for the Greater sage-grouse does overlap within the corridor. As noted above, the Big Sandy area/segment of the corridor is all GSG core habitat and about half of the Red Desert segment is core;
- Two Areas of Critical Environmental Concern (ACEC) overlap the corridor – the South Pass Historic Landscape and the Steamboat Mountain ACEC. Two Special Management Areas exist here – the Steamboat Mountain SMA and the Wind River East SMA. One Special Recreation Management Area is hosted in the corridor – the Wind River Front SRMA;
- The BLM funded study regarding the Steamboat mule deer herd titled, “Seasonal distribution patterns and migration routes of mule deer in the Red Desert and Jack Morrow Hills Planning Area” spawned the documentation of the largest mule deer migration recorded in the world at 150-miles from their summer range in the Hoback Basin to their wintering grounds in the Red Desert;
  - Sawyer, H. 2014. Seasonal distribution patterns and migration routes of mule deer in the Red Desert and Jack Morrow Hills Planning Area. Western Ecosystems Technology, Inc., Laramie, WY;
- The mule deer migration assessment was later written describing all segments of the corridor, their stopover areas, bottlenecks, fences, roads, various routes taken by individual deer and the landscape matrix of 150-miles the steamboat mule deer herd (now the Sublette mule deer herd) travel twice each year;
  - Sawyer, H., M. Hayes, B. Rudd, and M. J. Kauffman. 2014. The Red Desert to Hoback Mule Deer Migration Assessment. Wyoming Migration Initiative, University of Wyoming, Laramie, WY; and
  - [www.migrationinitiative.org](http://www.migrationinitiative.org).

#### Suggested Management

Our recommendations are designed to ensure the migration corridor’s persistence. Direct habitat loss and behavioral alterations from development in the corridor and its “stopover” areas (draft WGFD definition from September 2015: localized areas consistently used by ungulates to rest and feed during spring and fall migration) cause undue stress to the deer. Therefore, we recommend:

- The corridor should be identified as vital habitat;
- Big game crucial winter areas, parturition areas, stopover areas, and migration corridors should be identified officially by the BLM, recognized in the plan, and surface disturbing activities

should be avoided;

- The sportsmen community is currently collaborating with agriculture, energy, and the wildlife community to provide management criteria that will maintain historic uses of the lands while protecting the migration and wildlife numbers within the corridor. That being said, we will provide an update to this letter in the months to come with the management actions derived from that collaborative effort. In the meantime, we suggest such tools as no surface occupancy, timing stipulations, and controlled surface use as potential management tools to be considered for this corridor. The goal is to safeguard the corridor's fidelity and viability. Particular attention needs to be paid to the corridor's stopover areas where the vegetation and landscape is most beneficial to their well-being;
- Reduce wildlife stress and habitat fragmentation by not allowing new roads or transmission construction to bisect or parallel the migration corridor. If a new road or transmission pipeline cannot be avoided then time the construction and maintenance activities to avoid disturbance during migration periods (typically October to December) and (typically March to May);
- Rights-of-way management within the high use portion of the corridor should be labeled as an exclusion area. The highest use portion of the corridor is vital to maintaining the fidelity and viability of the corridor for the mule deer herd. A wind farm, for example, cannot be constructed in the middle of the corridor. The low and medium use portions of the corridor can be labeled as avoidance areas;
- We recommend, when possible, wildlife-friendly fencing for grazing allotments and/or seasonal let-down fences.
- Maintain historic land uses (i.e. grazing, visual resource management, cultural and historic trail protections, and OHV use).
- We support the Wyoming Executive Order 2015-4 and the management criteria set forth within for the Greater sage-grouse.

### **Jack Morrow Hills**

The Jack Morrow Hills (JMH) Coordinated Activity Plan (CAP) was completed in 2006. The BLM has informed the public that this management plan will be folded into the Rock Springs Resource Management Plan.

The JMH is valuable in wildlife quality and recreation opportunities. The area consists of about 620,000 acres including popular landscapes such as Steamboat Mountain, the Killpecker Sand Dunes, Boar's Tusk, and Oregon Buttes. The sporting heritage is strong in this rugged, desert landscape of buttes, mesas, and bluffs.

#### Resource Description

- Open space of sagebrush, including Great Basin sagebrush that reaches 10 feet tall or higher, is home to large populations of antelope, mule deer and a rare desert elk herd. 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;

- The Greatest sage-grouse have a stronghold in this area with core habitat, nesting, and winter concentration areas. Other wildlife species include the pygmy rabbit, ferruginous hawks, burrowing owl and the mountain plover;
- Cultural and historic qualities exist here from the Oregon and California National Historic Trails to the tri-territory marker. 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;
- The landscape holds unique geologic features such as the Boars Tusk, the Honeycomb Buttes, and Steamboat Mountain. The Killpecker sand dunes are one of the largest active sand dunes in the world;
- The Sweetwater River, known for its water quality and angling opportunities, is the JMH northern-most boundary;
- Seven wilderness study areas exist here – South Pinnacles, Alkali Draw, Honeycomb Buttes, Oregon Buttes, Whitehorse Creek, Sand Dunes, and Buffalo Hump; and
- The JMH has a handful of P/A oil wells, a number of active and P/A gas wells exist within the Killpecker Sand Dune Recreation Management Area.

#### Suggested Management

- Maintain the management objectives for wildlife (both aquatic and terrestrial) habitat management within the CAP: “The JMH CAP planning area will be managed to maintain, improve, or enhance the biological diversity of wildlife species while ensuring healthy ecosystems and to restore disturbed or altered habitat.” (JMH CAP, page 41, 2006);
- Maintain the oil and gas management stipulated in Map 11 (JMH CAP, 2006);
- Update the language to include the mule deer migration corridor and adopt strong management prescriptions that conserve the permeability of the corridor;
- The Jack Morrow Hills Coordinated Activity Plan laid out a process for implementation, monitoring and evaluation of the plan’s management in Appendix 2 (JMH CAP, A2-1, 2006). 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. We recommend the BLM review whether these data were collected, catalogued, reviewed, and evaluated. If they were not completed and/or need additional evaluation and review, the BLM needs to make this a priority;
  - The Rock Springs RMP should incorporate these processes as well;
- We support the Wyoming Executive Order 2015-4 and the management criteria set forth within for the Greater sage-grouse;
- Maintain hunting and angling access;
- Wild horse numbers need continued control as they are extremely territorial and compete for food among ungulates and grazers. Reduce the number of wild horses; and

- Maintain access to the Sweetwater River and water bodies throughout this priority habitat area. Evaluate whether the Sweetwater River should be managed as a Wild and Scenic River as seven public land parcels along the river (involving about 9.7 miles of the river) were found to meet this designation's suitability.

### **Adobe Town**

Adobe Town is a unique landscape with its sandstone spires and pinnacles. Adobe Town is managed as a Wilderness Study Area (WSA), split between that has acreage within both the Rock Springs and Rawlins BLM field offices, located southeast of Rock Springs in Wyoming's Greater Red Desert.

The 82,000 acre WSA is the perfect place for a person to find solitude, big game, archeological and paleontological resources.

### Resource Description

- The WSA has a non-discretionary closure for oil and gas leasing;
- 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 the ungulates. This habitat has the vegetation, cover, and contiguous landscape that wildlife need for survival;
- Recreation pursuits include hunting, wildlife watching, fossil finding, photography, and solitude;
- A variety of wildlife live in 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 here;
- 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;
- Evidence shows Paleo Indian inhabitants lived within the Adobe Town WSA for 12,000 years of continuous occupation;
- In addition, this landscape is one of North America's premier sites for paleontological resources;
- Wyoming Oil and Gas Conservation Commission identify:
  - two oil well permits exist southwest of Adobe Town, a handful of natural gas permits on its west, and about 12 permitted gas wells looking east from Adobe Town
  - No coalbed methane permits
  - A moderate number of P/A gas wells surrounding Adobe Town

### Suggested Management

- Maintain the same protections that are there today. Adobe Town is a Wilderness Study Area and should remain so unless Congress elevates its designation to Wilderness; and
- The extreme sensitive nature of the soils and pinnacles of Adobe Town coupled with the moderate to high natural gas activity surrounding the area, it is imperative the Wilderness Study Area stay intact as the management tool.

## **Greater Little Mountain Area**

For generations the Greater Little Mountain area of Wyoming has served as a hunting, fishing and recreational paradise for sportsmen. While relatively unknown to many, this area is truly one of the West's hidden gems. The landscape is about 522,000 acres in size.

### Resource Description

- 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 big game in Wyoming. If chasing native trout on small streams in remote country is your passion, this area holds excellent conservation populations of native Colorado River cutthroat in small, clear streams where a fly fisherman can enjoy an entire day with no other anglers in sight;
- Overall, the region possesses large intact tracts of prime fish and wildlife habitat that translates into tremendous opportunities for hunters and anglers. Because this quality habitat and these opportunities are irreplaceable, the Greater Little Mountain Coalition was formed to ensure that sportsmen in Wyoming and the West will continue to enjoy this unique landscape for generations to come;
- Energy potential in the GLMA is strong in the southeast corner for oil and natural gas. Seven energy units (Horseshoe Basin, Whiskey Canyon, Canyon Creek Dome, Alkali Gulch, Trail, Chicken Springs, and Kinney) are currently defined, one energy unit (called the Rubicon) is identified in the sugarloaf basin and sage creek areas east of Little Mountain proper (WOGCC, 11/2015, <http://wogccms.state.wy.us/flexviewers/unitmap/>), and a very small energy unit (80 acres approximately) called Salt Wells is identified just north of Potter Mountain. The Rubicon unit was sunset at least two years ago, which would need to be reflected within the BLM data and the WOGCC data;
- Six Colorado River Cutthroat Trout streams exist in the GLMA – Trout Creek, Gooseberry Creek, Sage Creek, Red Creek, Currant Creek, and Little Red Creek. The population has been designated as a core conservation population and is a Species of Greatest Conservation Need by the Wyoming Game and Fish Department;
- Over 50 percent of the GLMA is currently leased for oil and gas development. The Wyoming Oil and Gas Conservation Commission (<http://wogccms.state.wy.us/flexviewers/unitmap/>) identifies that the GLMA currently has no oil, gas, or coalbed methane permits. A handful of P/A gas wells east of Hwy 191. Between hwy 191 and hwy 430 there is a low level of natural gas activity from producing gas wells to P/A wells. The most natural gas extraction activity is located in the Horseshoe Basin and east of hwy 430 in the Hiawatha field.

### Suggested Management

The Greater Little Mountain Area is of critical importance to hunters, anglers, wildlife watchers and recreationists. We, the undersigned sportsmen groups, understand the value of this area and recommend management reflect a strong focus on wildlife (terrestrial and aquatic). In 2008, a local set



of sportsmen and union representatives established the Greater Little Mountain Coalition (Coalition). The Coalition is currently revising their management recommendations for the area and communicating with a variety of stakeholders. The BLM will be presented with the Coalition's management recommendations in the coming weeks. We will follow their lead on suggested management.

Our general management recommendations include:

- A request for clear management protocols focused on maintaining fish populations and an action plan for mitigation if and when populations decline;
- Providing opportunities to expand or enhance Colorado River cutthroat trout habitat;
- Supporting 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;
- The Little Mountain area's rugged and sensitive landscape should be managed to support abundant wildlife and fish populations;
- Maintain the off-road vehicle management within the GLMA, which consists of being open in the Salt Wells area or northeast corner and staying on designated roads and trails within the remainder of the GLMA;
- The BLM nominated this area to be managed with Master Leasing Plan criteria. We recommend these prescriptions, along with the management recommendations forthcoming by the Greater Little Mountain Coalition, be folded into the MLP criteria and management for wildlife, habitat, recreation, and energy development;
- A selection of roads within the sage creek portion of the ACEC and sugarloaf basin special management area were highlighted in the Green River RMP 1997 as roads considered for Back Country Byway Designation. We suggest nominating those roads to be included in the larger National Scenic Byways Program; and
  - BLM: "The National Back Country Byway Program is BLM's unique contribution to the larger National Scenic Byways Program. Both programs were created following a study by the President's Commission on Americans Outdoors that found 43 percent of American adults identified driving for pleasure as a favorite pastime."  
([http://www.blm.gov/wo/st/en/prog/Recreation/recreation\\_national/byways.html](http://www.blm.gov/wo/st/en/prog/Recreation/recreation_national/byways.html))

### **Flaming Gorge**

The Flaming Gorge area outside of the acres managed by the BLM is managed by the Bureau of Reclamation. The Flaming Gorge BLM lands, including the Warren Bridge Campground, are recreationally important for anglers, campers, and hikers. OHV use around the Gorge is another favorite. The Greater Little Mountain Area borders the Flaming Gorge on the east. The anglers, hunters, and visitors to the GLMA often see or utilize the Gorge.

#### Resource Description

- The views surrounding the Gorge are impressive, to say the least;
- Colorado River cutthroat trout, flannelmouth suckers, and lake trout exist within the streams

- and hydrological water recharge areas that flow into the Flaming Gorge;
- The Devils Playground and Twin Buttes are two Wilderness Study Areas west of the Flaming Gorge and of hwy 530;
  - Big game crucial ranges reside along the entire length of the Bureau of Reclamation lands as well as along the entire east side of the Gorge onto BLM managed lands and within the Greater Little Mountain Area; and
  - The Wyoming Oil and Gas Conservation Commission (<http://wogccms.state.wy.us/flexviewers/unitmap/>) identifies minimal mineral activity west of Flaming Gorge. In fact, two natural gas permits and one oil permit reside near the WSAs. Over the last several years, many oil and gas leases have been sold west of the Flaming Gorge and on the east side many oil and gas leases have been sold since the 1990s. The east side (also known as the Greater Little Mountain Area) has been heavily leased with about half the acreage under lease. However, some of those leases will see their terms ending.

#### Suggested Management

- A selection of roads within the sage creek portion of the ACEC and sugarloaf basin special management area were highlighted in the Green River RMP 1997 as roads considered for Back Country Byway Designation. We suggest nominating those roads to be included in the larger National Scenic Byways Program;
- The WSA's are non-discretionary closures for lease areas;
- Maintain area as both oil shale and coal withdrawal because those two types of energy extraction would devastate the surface vegetation, natural hydrological pathways and water flow structure; and
- All trout streams need a 500 foot buffer from development to minimize sediment loading, erosion, and contamination.

#### Conclusion

In conclusion, the Rock Springs RMP is of major importance to the sportsmen and women community. We would like to support the BLM and aid the agency as the process moves forward. Our priority habitats (Big Sandy area, Jack Morrow Hills, Greater Little Mountain Area, Red Desert to Hoback mule deer migration corridor, Adobe Town, and the Flaming Gorge area) need ample attention because these areas have the best wildlife and habitat within the Rock Springs field office and the best recreation opportunities for hunters, anglers, and wildlife watchers.

Overall, these landscapes deserve adequate management that maintains their contiguous, intact habitat, which will mean limiting surface disturbance to avoid fragmentation and vegetation removal. Migrating ungulates will benefit from wildlife friendly fencing and permeable corridors for them to travel between their summer and winter ranges. Developing and implementing plans to mitigate the impacts of development on fish and wildlife is a critical step as well.

Thank you for reviewing the information provided here. We recommend incorporating our management recommendations as you move forward with revising your field office-wide resource management plan. If you would like either additional information or to discuss our recommendations further, please feel free to contact us.

Sincerely,

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