



Theodore  
Roosevelt  
Conservation  
Partnership



December 10, 2019

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 (RSFO) encompasses 3.6 million acres of public land surface available to sportsmen and sportswomen for hunting, angling, hiking, camping, and recreating. Public land within Lincoln, Sweetwater, Uinta, Sublette, and Fremont counties are totally or partially managed by RSFO. We, the undersigned sportsperson groups, utilize the entire field office and, in particular, six unique landscapes that 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 Devil's Playground/Twin Buttes area (Appendix A).

To date, we have fully participated in the National Environmental Policy Act process revising the 1997 Green River Resource Management Plan that will now be called the Rock Springs Resource Management Plan (RS RMP). Comments were submitted in 2010 under the scoping NEPA phase of the RS RMP revision. In December 2015, we submitted a similar letter detailing our management recommendations while incorporating current science and wildlife information. This 2019 letter is to further support those recommendations in addition to maintain the ask that you assign these areas strong conservation management prescriptions within 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
- Devil's Playground/Twin Buttes

All of these areas include biologically and ecologically significant habitat for wildlife. Big game such as elk, mule deer, pronghorn, and moose make this area their home from seasonal habitat and migration corridors to parturition areas and crucial winter habitat. Colorado River Cutthroat Trout (CRCT) and many other Species of Greatest Conservation Need (SGCN) exist under RSFO management.

### **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

- 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. 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 describes 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 biologically productive and diverse 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 obligate species inhabit this area seasonally or year-round and represent

some of the largest populations remaining in 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 and sportswomen 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 2019-3 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.

#### **Sublette (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.

#### 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);
- Wyoming is fortunate to have many functioning big-game migration corridors. Migration corridors are essential to the long-term persistence of big game species. Migrating big-game herds support larger numbers of animals than resident herds. This ensures healthier populations

which in turn support quality-hunting opportunities that help to preserve our hunting heritage;

- Research has shown that mule deer have a strong fidelity to these learned migration corridors from generation to generation that overrides the animal's potential to strike out and learn new routes. Thus, deer handle exposure to development by altering movements-both rates and timing/duration-rather than changing the routes they traverse;
- Research has also shown that mule deer spend 95% of their migratory period foraging at stopover areas and return to the same stopover areas every migration. Ungulates move through disturbed areas faster, detour around disturbance, and reduce their use of stopover areas; and
- Current best available science indicates potential thresholds of disturbance that, once exceeded, can render otherwise suitable winter range habitat unsuitable. When assessing long term response of energy development on mule deer on the Pinedale Anticline, Sawyer et al. (2017) found that direct habitat loss of winter range from well pads and roads - accounted for only 3.5% of the study area - yielded a 36% decline in deer numbers. Similarly, researchers have found that higher densities of development infrastructure alter movement and behavior patterns along migration corridors.

### 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 cause undue stress to the big game. Therefore, we recommend:

- The corridor should be identified as vital habitat by the BLM;
- 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;
- We suggest incorporating a No Surface Occupancy stipulation for new leases or as a condition of approval applied to existing leases in stopover areas, bottlenecks, and high-use routes of migration corridors, as identified by Wyoming Game and Fish Department in consultation with the BLM. This management directive would facilitate long-term maintenance of big game wildlife populations and protect mule deer, elk, and pronghorn antelope migration corridors from disturbance that would impair habitat functionality;
- Prior to surface occupancy and use within low and medium use routes, a Habitat Management Plan must be approved by the Authorized Officer to maintain functionality of the corridor, including a survey of existing surface disturbances to determine a baseline of surface disturbance, a commitment to maintain or improve existing levels of disturbance, limits on timing of activities and/or approach to siting surface facilities to limit disturbance, and a monitoring plan;
- Commitments to maintain or improve existing levels of disturbance will include specific activities to: (a) limit new surface disturbance, such as phased or clustered development; (b) limit other impacts, such as limiting activities during most important times of use of the migration corridor; and (3) restore to pre-development disturbance;
- In accordance with Department of Interior Secretarial Order 3362 direction to the BLM is to work with state wildlife agencies "to enhance and improve the quality of big-game winter range

and migration corridor habitat on federal lands...”;

- 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 schedule the construction and maintenance activities outside of the migration timeframe 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;
- Increased movement rate through developed areas and outright avoidance of infrastructure are important considerations regarding impacts of development. Density- disturbance relationships should be considered, and appropriate management actions taken that include use of a maximum surface disturbance restriction;
- We recommend, when possible, wildlife-friendly fencing for grazing allotments and/or seasonal let-down fences; and
- Maintain historic land uses (i.e. grazing, visual resource management, cultural and historic trail protections, and OHV use).

### **Jack Morrow Hills**

The Jack Morrow Hills (JMH) Coordinated Activity Plan (CAP) was completed in 2006. We believe that the CAP should be folded into the Rock Springs Resource Management Plan preferred alternative.

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 longest active sand dunes in the world;
- The Sweetwater River, known for its water quality and angling opportunities, is the JMH northern-most boundary; and
- Seven wilderness study areas exist here – South Pinnacles, Alkali Draw, Honeycomb Buttes, Oregon Buttes, Whitehorse Creek, Sand Dunes, and Buffalo Hump.

### 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) including the Steamboat Mountain and Greater Sand Dunes ACEC;
- 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 2019-3 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 (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 acreage between 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; and,
- In addition, this landscape is one of North America's premier sites for paleontological resources.

#### 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 (GLMA) of Wyoming has served as a hunting, fishing and recreational paradise for sportsmen and sportswomen. While relatively unknown to many, this area is truly one of the West's crown jewels. The landscape is 522,236 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 (Coalition) was formed in 2008 to ensure that sportsmen and sportswomen in Wyoming and in the West will continue to enjoy this unique landscape for generations to come; and
- 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.

#### Suggested Management

The Greater Little Mountain Area is of critical importance to hunters, anglers, wildlife watchers and recreationists. We, the undersigned sportsperson groups, understand the value of this area and we support the Coalition’s management proposal submitted to the Rock Springs BLM field office on December 14, 1018 (Appendix B).

#### **Devil’s Playground and Twin Buttes**

The Devil’s Playground and Twin Buttes areas are BLM lands that have ecological and biological importance for wildlife, cultural significance, and night sky clarity for viewing stars.

#### Resource Description

- The Devils Playground and Twin Buttes are two Wilderness Study Areas west of the Flaming Gorge and off of hwy 530; and
- Big game crucial ranges reside along the entire length of the Flaming Gorge area.

#### Suggested Management

- 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 sportswomen community. 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 Devil’s Playground/Twin Buttes 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 strong management that maintains and/or enhances their contiguous, intact habitat, which means 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 into the preferred alternative of the field office-wide resource management plan. If you would like either additional information or to discuss our recommendations further, please feel free to contact Joy Bannon at [joybannon@wyomingwildlife.org](mailto:joybannon@wyomingwildlife.org) or (307) 287-0129.

Sincerely,

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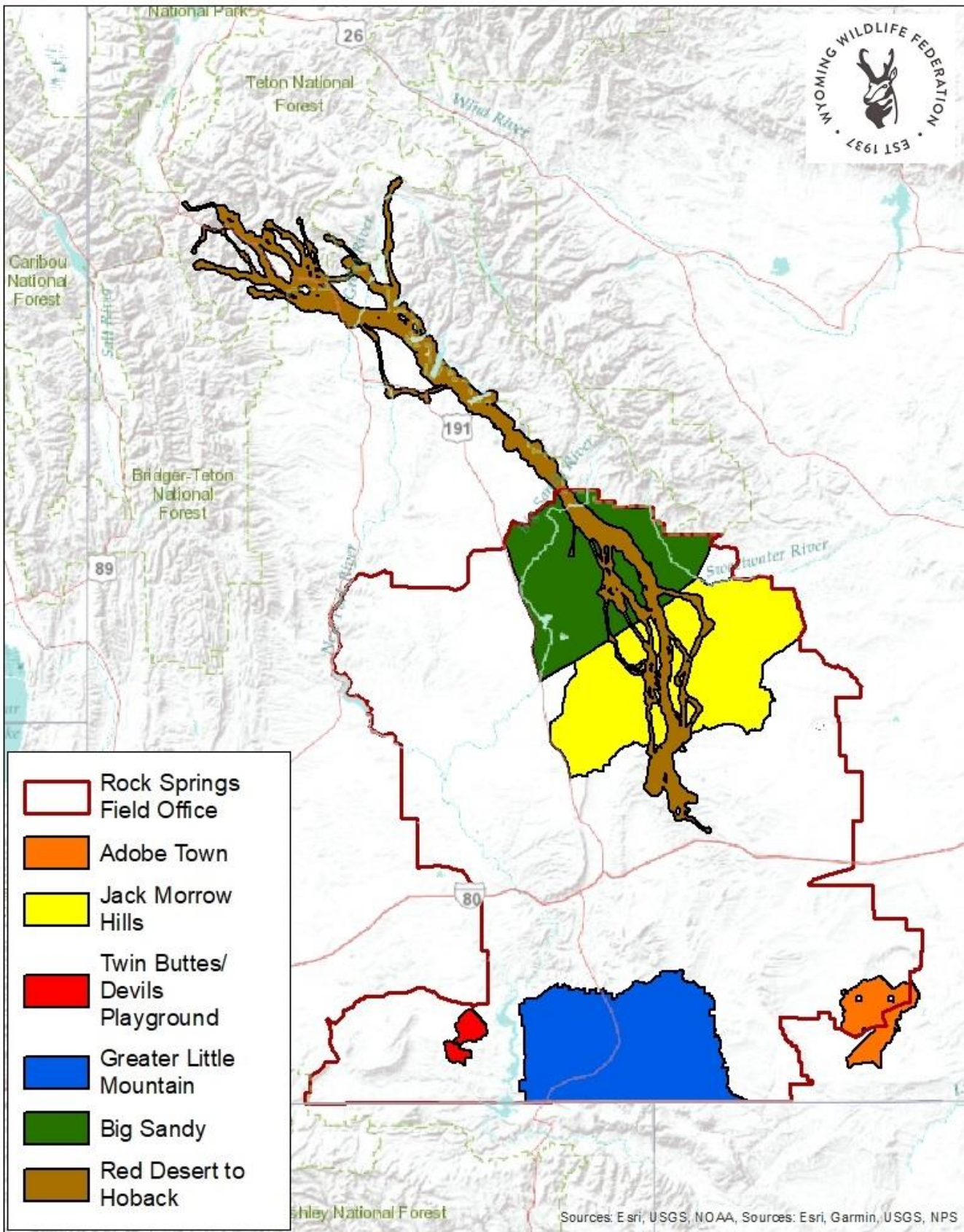
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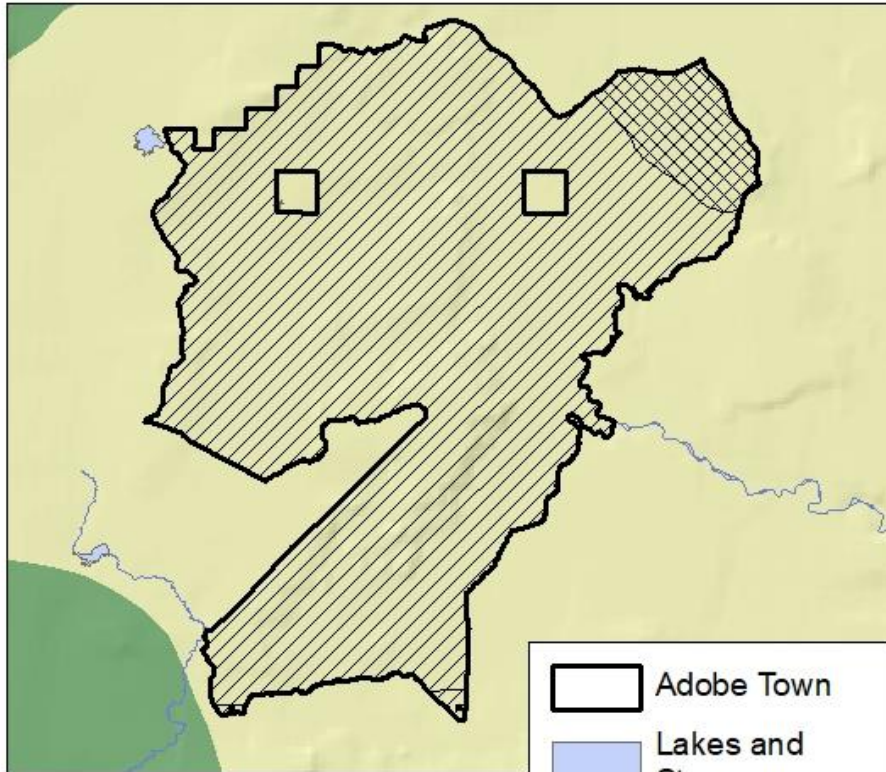
# Priority Areas



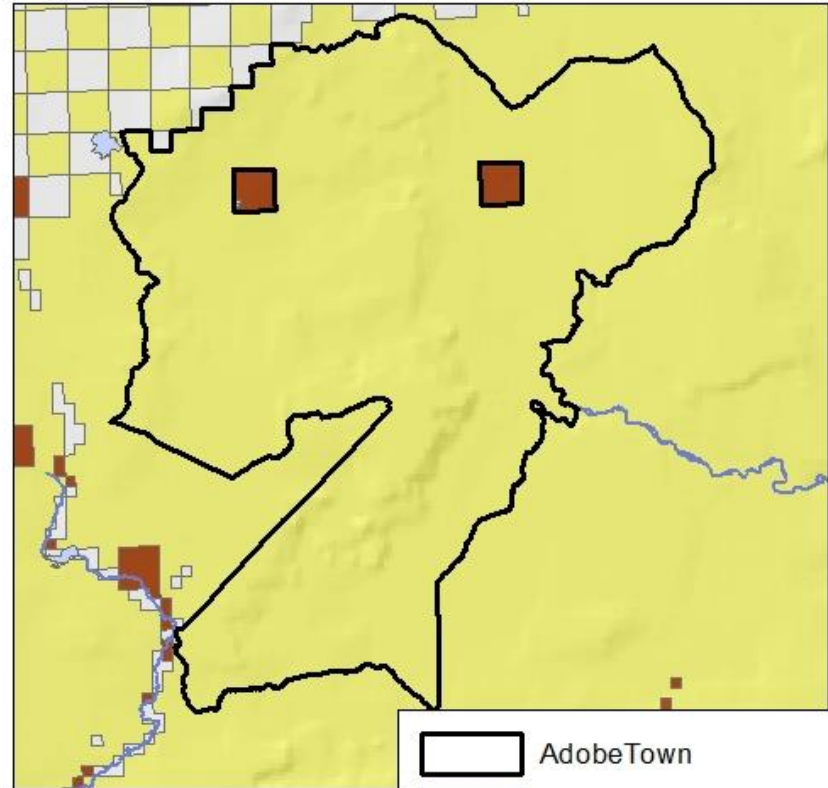
# Adobe Town: Priority Area

Area  
= 154340 acres

### Wildlife Values



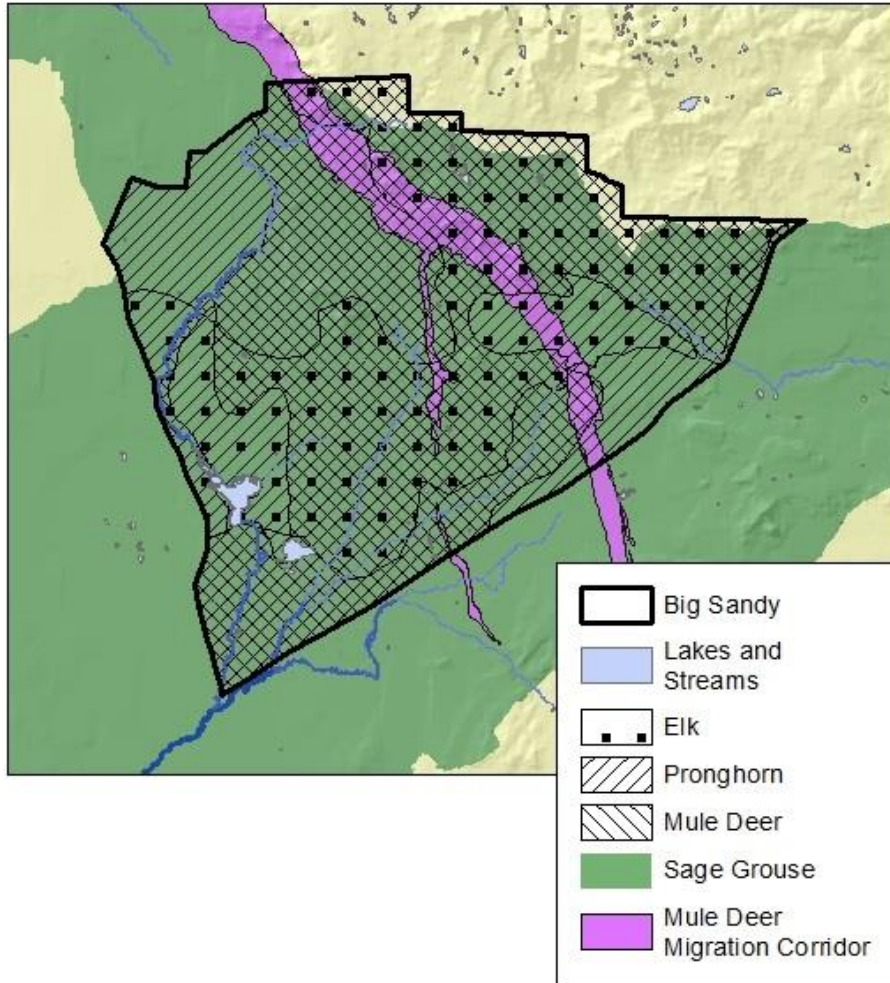
### Land Ownership



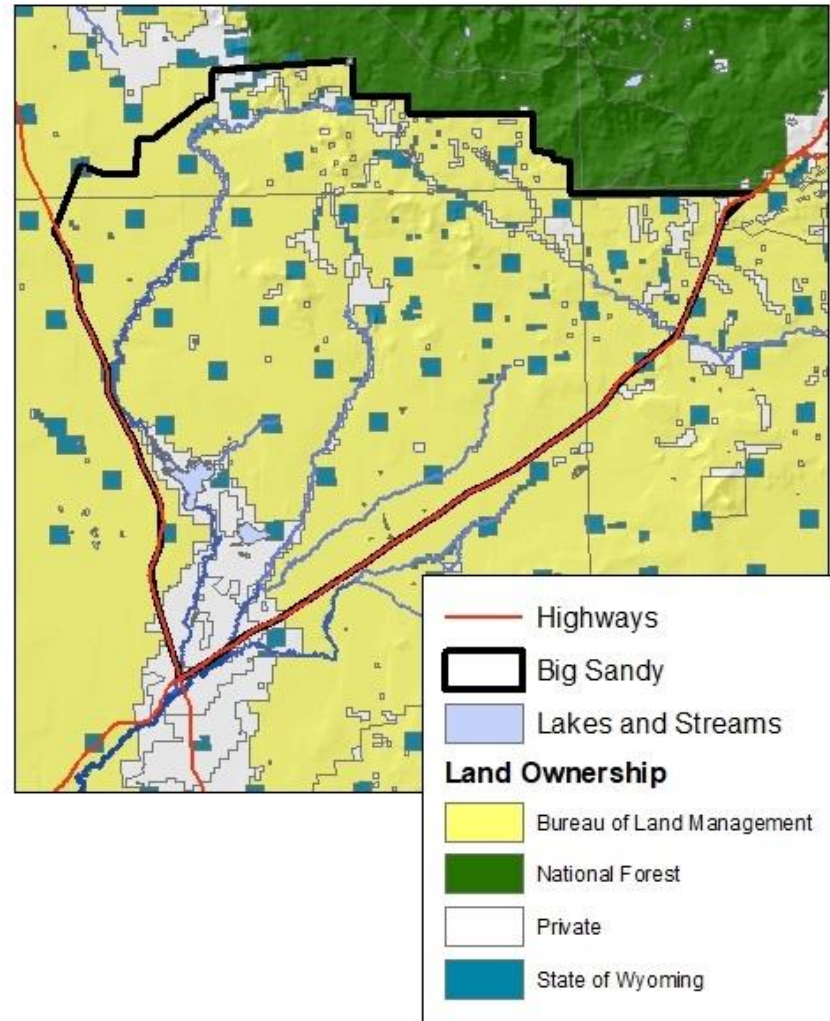
# Big Sandy: Priority Area

Area =  
471314 acres

### Wildlife Values



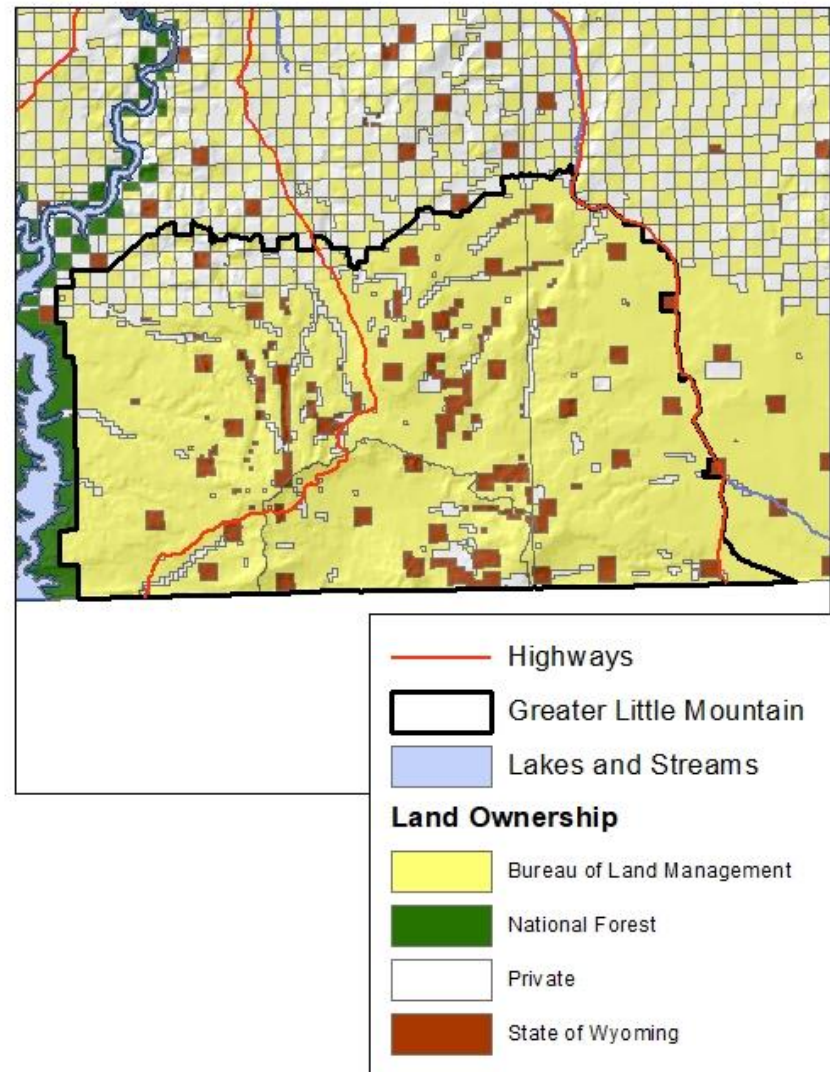
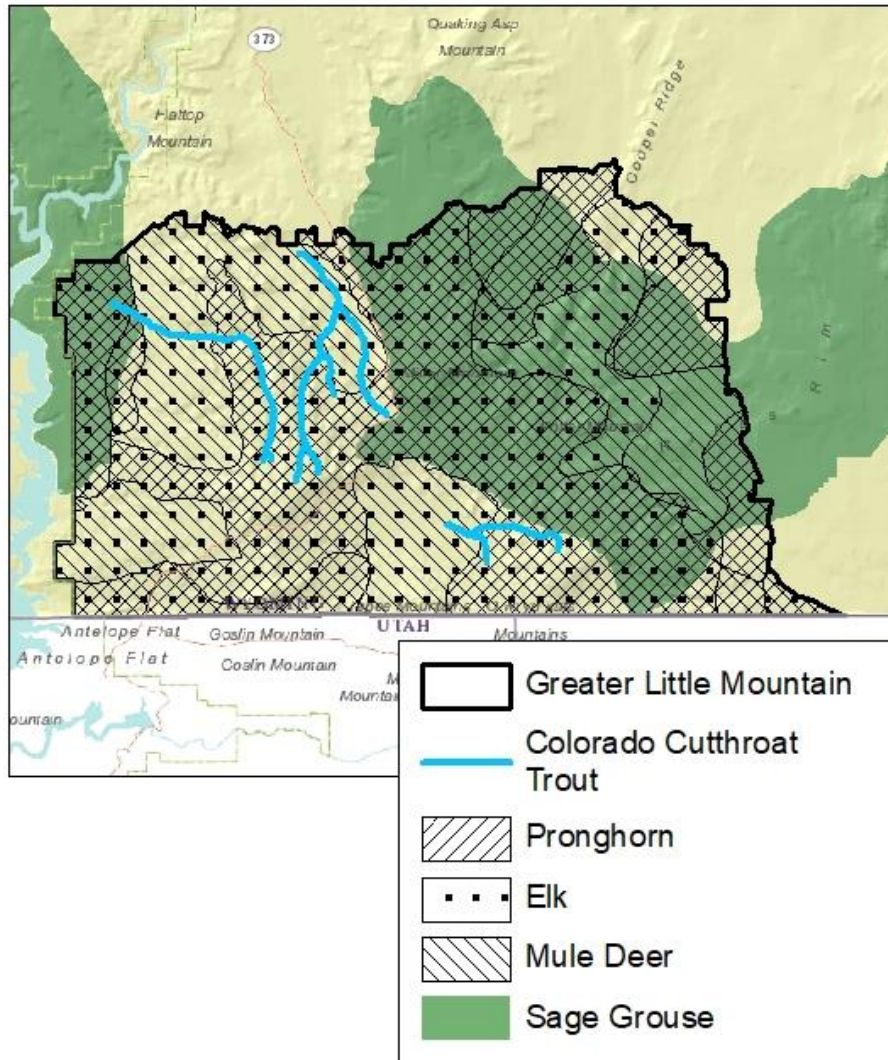
### Land Ownership



# Greater Little Mountain: Priority Area Area = 522,236 acres

Wildlife Values

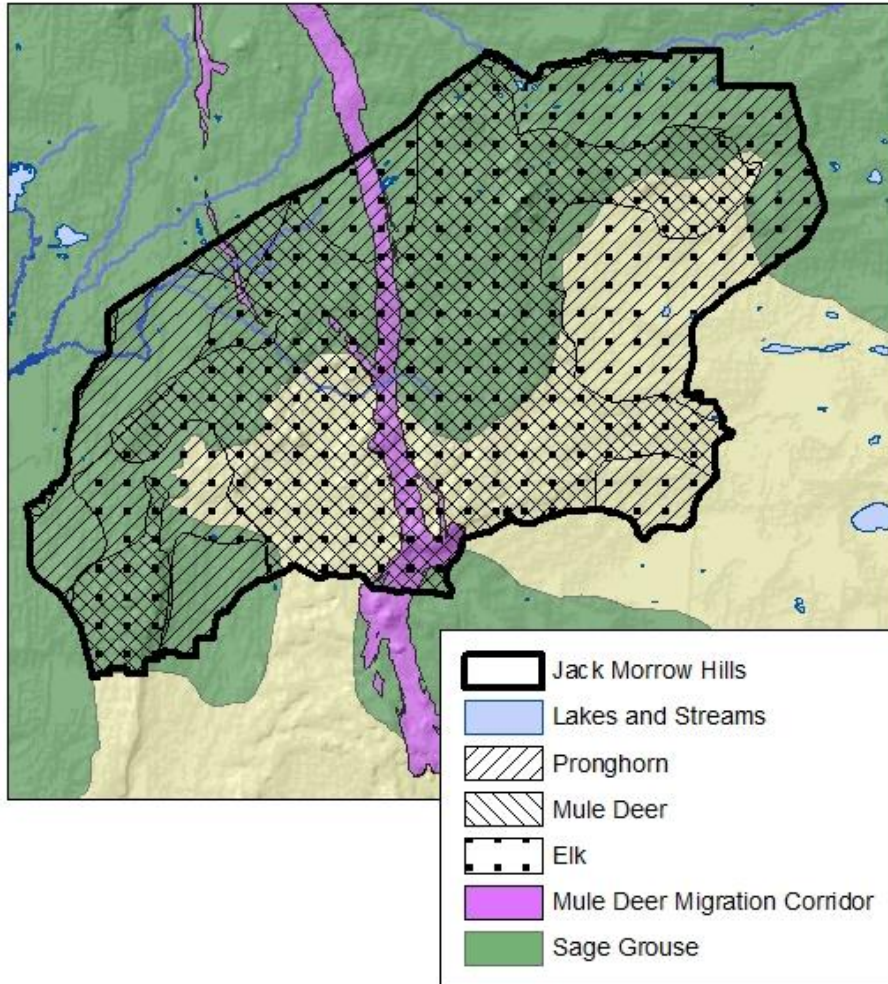
Land Ownership



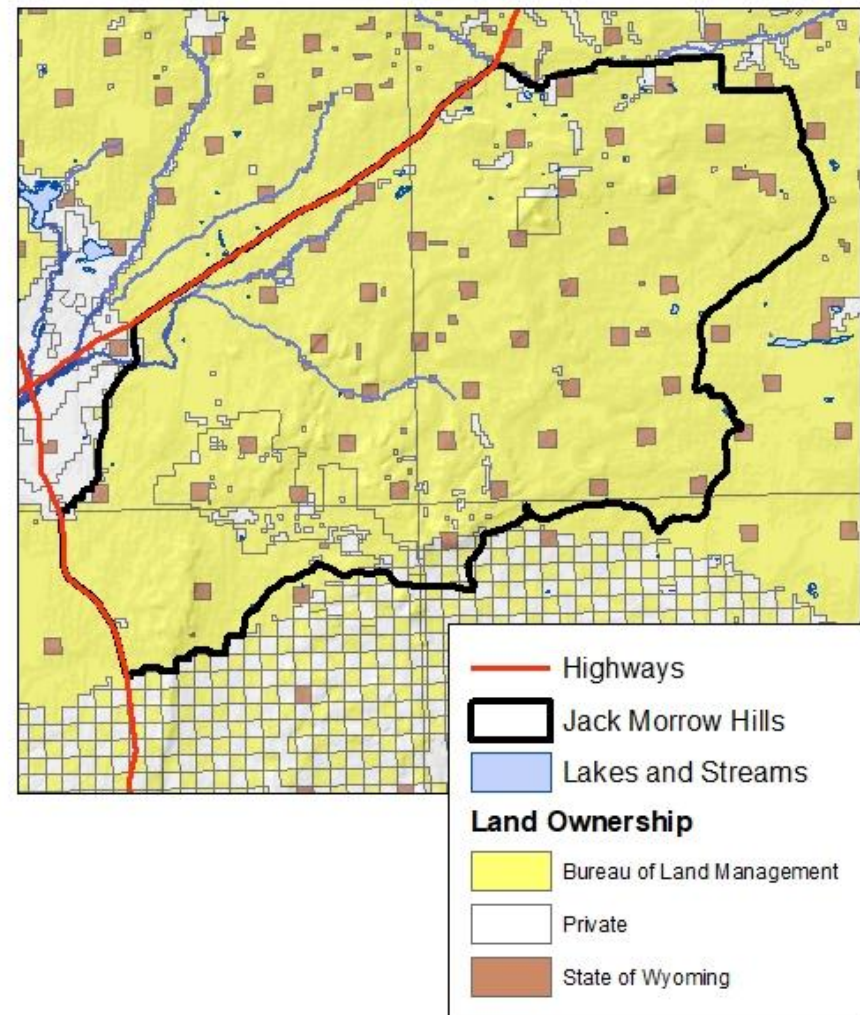
Area =  
622342 acres

# Jack Morrow Hills: Priority Area

Wildlife Attributes



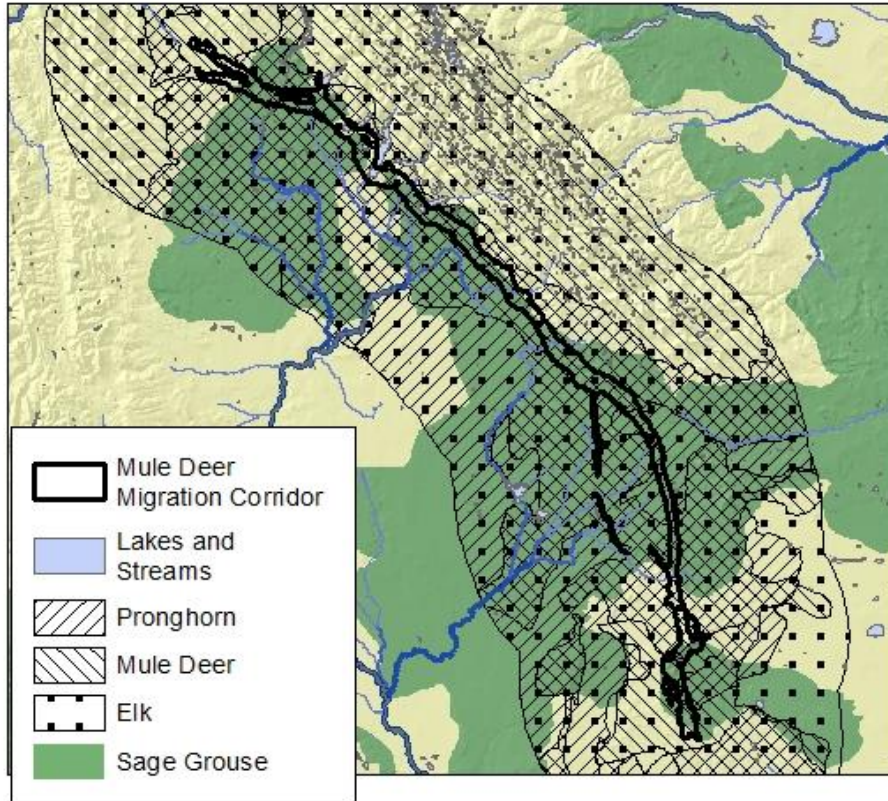
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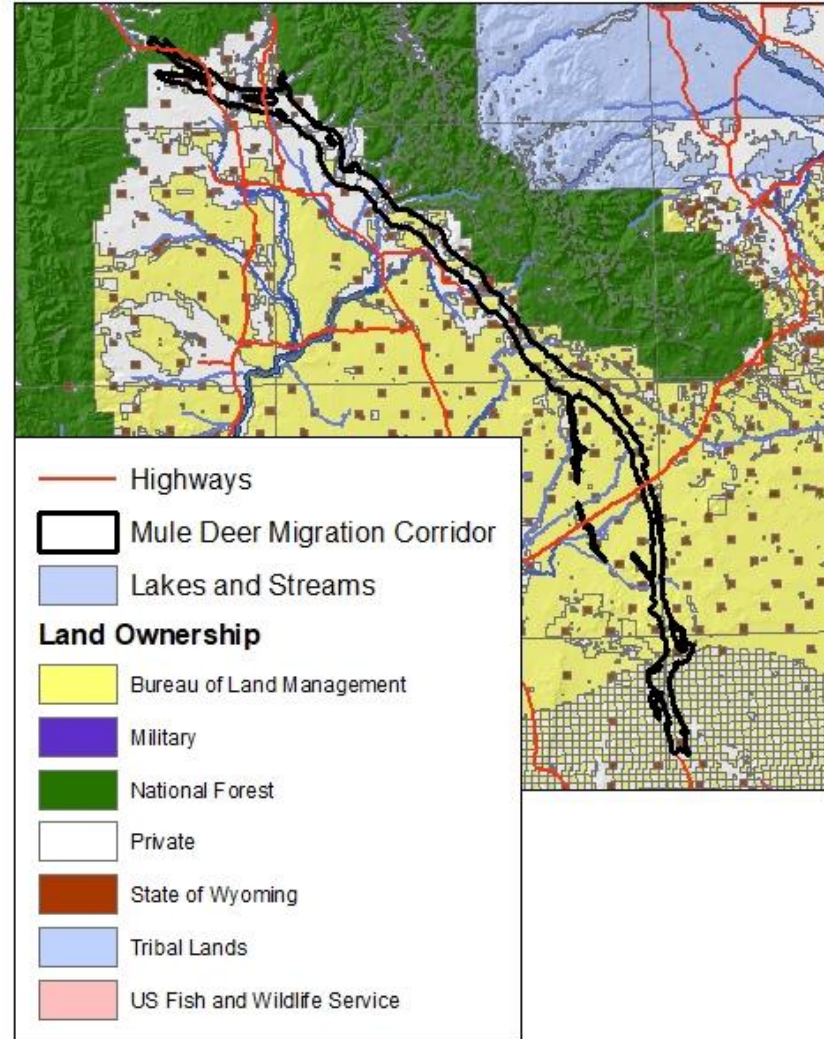
# Red Desert to Hoback Migration Corridor: Priority Area

Area  
= 173852 acres

Wildlife Values



Land Ownership

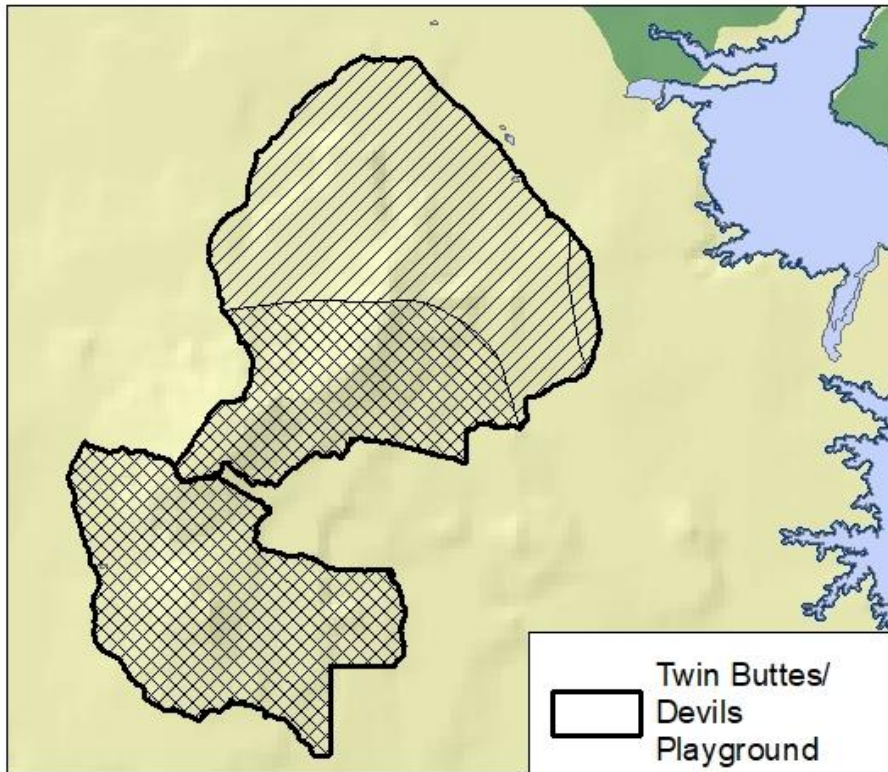




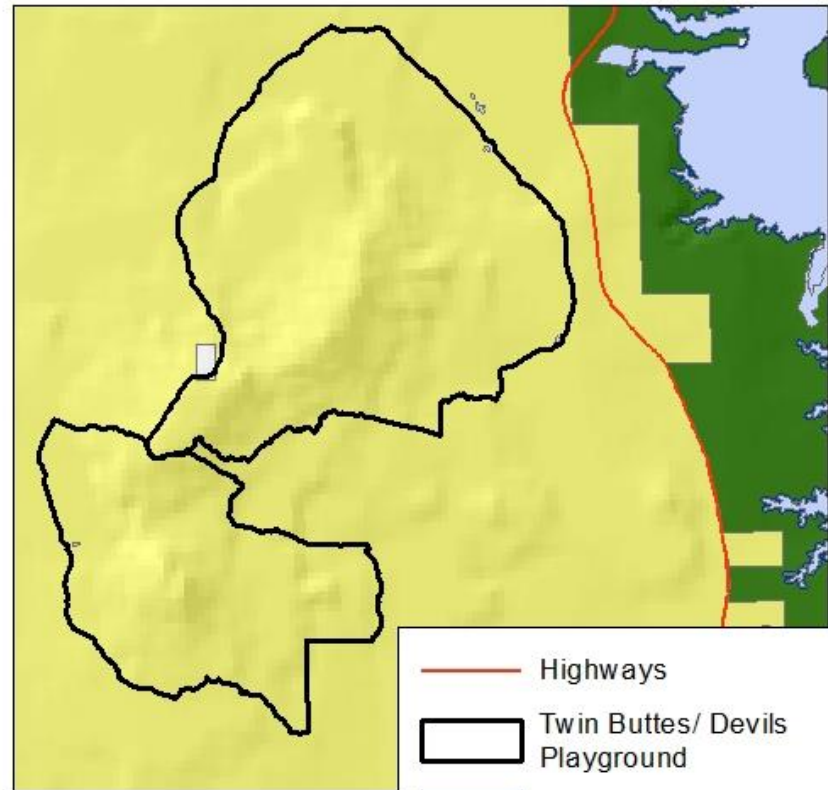
# Twin Buttes/ Devil's Playground: Priority Area

Area  
= 42783 acres

### Wildlife Values



### Land Ownership





December 14, 2018

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

RE: Alternative for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following document to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision. The alternative is specific to the Greater Little Mountain Area (GLMA). This crown jewel of Sweetwater County, Wyoming consists of 522,236 acres bounded to the west by Flaming Gorge Reservoir, to the north by Pretty Water Creek, to the east by Highway 430 and to the south by the Utah-Colorado state line. This document falls within the range of existing alternatives; therefore, no additional analysis should be needed, however, we trust this information helps in forming the preferred alternative.

The Coalition is proposing the following resource management prescriptions:

- Implementation of an upfront plan for responsible oil and gas leasing in the proposed GLMA boundary by the Coalition that includes the Sage Creek watershed;
- Creation of additional no surface occupancy (NSO) and right of way exclusion (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat, improve watershed conditions and recreational opportunities;
- Maintenance of existing management in Currant Creek and Red Creek management areas and;
- Application of controlled surface use stipulations (CSU) in the Pine Mountain management area.

### **Background**

The Coalition is an assembly of sportsmen and sportswomen organizations, union members, miners and more than 2,500 hunters, anglers and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample outdoor recreation opportunities. The Coalition partners include: Bowhunters of Wyoming (BOW), Muley Fanatic Foundation (MFF), Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership (TRCP), Trout Unlimited (TU) and Wyoming Wildlife Federation (WWF).

### **Alternative**

The GLMA comprises 14% of the entire BLM Rock Springs Field Office public land surface estate yet provides some of the most highly valued fish and wildlife habitat and hunting opportunities in the Rock Springs planning area. In fact, the GLMA holds some of the most sought after big-game hunting units in the state and Eastman's Hunting Journal regularly names these deer and elk units in their top five hunts for Wyoming. Since 1990, organizations and agencies have placed

over \$6 million dollars on-the-ground enhancing and maintaining the land and water value that the Coalition and the public hold dear. Wyoming Game and Fish Department (WGFD), BLM, Wyoming Conservation Landscape Initiative (WCLI), BOW, Western Wyoming Mule Deer Foundation, Doris Duke Foundation, Wyoming Governor’s Big Game Licensing Coalition (WGBGLC), The Nature Conservancy (TNC), MFF, Bureau of Reclamation (BOR), Central Utah Project Completion Act, U.S. Fish and Wildlife Service (USFWS), National Fish and Wildlife Foundation, Wyoming Wildlife Natural Resource Trust Fund (WWNRT), Natural Resources Conservation Service (NRCS), Rocky Mountain Elk Foundation (RMEF), and TU to name several have completed extensive habitat work within the GLMA that enhances native cutthroat trout and big game habitat, improves grazing management and provides opportunities for hunting, angling and other outdoor recreation activities.

Rather than continue the fragmented small-scale land management approach through Applications for Permit to Drill (APD), the Coalition recommends implementing habitat conservation parameters on an area that includes the entire proposed boundary of the GLMA, including Sage Creek watershed, and incorporates upfront planning with specific oil and gas lease parcel stipulations to mitigate anticipated impacts and protect resources on public lands in accordance with the BLM’s multiple-use and sustained yield mandate. As noted in previous letters and our Proposal (dated 1.26.16 and attached to this alternative), the Coalition believes the GLMA is the ideal place to showcase an upfront planning process for oil and gas leasing that would define responsible energy development and take in to account the cumulative impacts of industrial uses on our public lands.

These recommendations are for all new leasing activities within the GLMA. The Coalition’s Proposal highlights the fish, wildlife and outdoor recreation values found in the GLMA. This alternative defines those values for the six areas using Geographic Information Systems (GIS) science and highlights the boundary compromise the Coalition made since its inception in 2008 (Figures 1 and 2) and the new-collar data available for big game movements. The Coalition recognizes the 1997 Green River Resource Management Plan as the current land use plan for the GLMA.

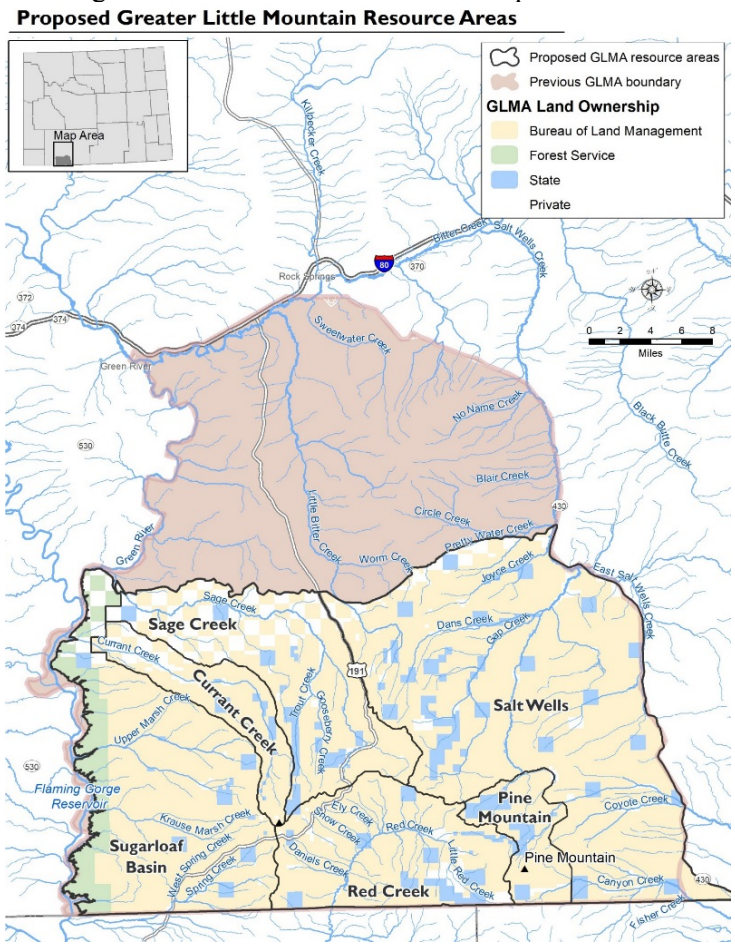


Figure 1. Leading back to negotiations in 2008, the northern boundary was shifted south to avoid conflict in the checkerboard in the Greater Little Mountain Area and to honor a compromise with the Rock Springs Grazing Association.

## **Sugarloaf Basin Special Management Area**

1. No Surface Occupancy (NSO) for Sugarloaf Basin
2. Rights-Of-Way (ROW): Upgrade Sugarloaf Basin SMA from avoidance to exclusion.

The Coalition requests the BLM consider new movement data from big game collared as part of the University of Wyoming's Deer-Elk Ecology Research. More important than originally proposed, research data indicates Sugarloaf Basin provides high value habitat for wintering deer and elk.

## **Currant Creek Portion of the Red Creek ACEC**

1. Maintain NSO for Currant Creek ACEC of the Greater Red Creek ACEC
2. Maintain ROW exclusion within Currant Creek ACEC
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Currant Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks. There are several large, contiguous blocks of unleased parcels including parcels in Marsh Creek, Currant Creek, Sage Creek and Trout Creek.

## **Sage Creek Portion of the Red Creek ACEC**

1. NSO for Sage Creek
2. ROW: Upgrade Sage Creek ACEC from avoidance to exclusion
3. No new leasing of contiguous blocks of land identified in December 2009 letter from BLM to Governor Freudenthal, that fall within the Sage Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks.

## **Red Creek ACEC**

1. Maintain designated ACEC and fluid mineral withdrawal area.
2. ROW: maintain exclusion area.

## **Pine Mountain Management Area**

1. NSO for 14,982 acres
2. CSU for 2,513 acres

The Coalition recommends NSO of 14,982 acres in the Pine Mountain area to protect groundwater recharge areas, crucial big game habitat and parturition areas and important Colorado River cutthroat trout (CRCT) habitat. Outside of the proposed NSO, the Coalition recommends 2,513 acres of CSU stipulations, utilization of mandatory best management practices, implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."<sup>1</sup>

## **Salt Wells Resource Area**

1. Remove big game timing stipulations on development in the Salt Wells Resource Area if;
  - a. NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area and a portion of Pine Mountain and;
  - b. the management for Currant Creek and Red Creek remain the same.

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<sup>1</sup> Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

	Federal Acres (GIS)	GR RMP Acres (plats)	Closed to minerals leasing	NSO acres	CSU acres	Acres Leased to Oil & Gas as of Dec 2018	Comments
<b>Sage Creek Portion of the Greater Red Creek ACEC</b>	52,190	52,270	-	52,190	-	0	Northern boundary of GLMA to include Sage Creek watershed-important CRCT <sup>2</sup> occupied and expansion habitat
<b>Current Creek Portion of the Greater Red Creek ACEC</b>	23,699	23,740	-	23,699	-	0	Important big game crucial habitat and CRCT habitat
<b>Red Creek Portion of the Greater Red Creek ACEC (including WSA)</b>	55,691	63,900	55,691	-	-	551	Leases pre-date federal mineral withdrawals and FLPMA. Extremely fragile soils and high watershed values. Habitat for pure strain CRCT
<b>Pine Mountain Special Management Area</b>	17,495	64,200	-	14,982	2513	1,012	Combination of NSO and CSU to protect crucial big game habitat and watershed integrity
<b>Sugarloaf Special Management Area</b>	106,266	85,880	-	106,266	-	3,887	New collar data from UW -very important area for wintering deer and elk. Marsh Creeks flow directly into Flaming Gorge Reservoir-important for coldwater sport fish
<b>Salt Wells Management Area</b>	178,235	229,508	-	-	-	16,958	Crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer
<b>Totals</b>	433,576	519,498	55,691	197,137	2513	22,408	-
<b>% of Total</b>	-	-	12.8%	45%	.58%	5.2%	-

Figure 2. Management recommendations and approximate acreage for six areas identified within the Greater Little Mountain Area. The total acreage of the GLMA is 522,236 (BLM 80%, USFS 4%, State 8%, Private 8%).

<sup>2</sup>Colorado River cutthroat trout (CRCT) is the only trout native to the Green and Little Snake river drainages in Wyoming. CRCT prefer clear, cold water, naturally-fluctuating flows, low levels of fine sediment and complex habitats. The GLMA is habitat for genetically pure CRCT.

In the GLMA, any APDs and development proposals should be coordinated through the WGFD to determine best placement for well pads and associated structures. This includes maintaining functionality and connectivity of the GLMA for fish and wildlife objectives. The BLM should require industry to use gold book standards for reclamation and maintenance of native vegetation. The GLMC requests to be notified about any APD that effects fish and wildlife resources in the GLMA, as well as APD's for parcels leased in the GLMA.

A review of cumulative impacts in the GLMA from development proposals should take place before further leasing and permitting continues to best protect traditional land uses such as livestock grazing, hunting and fishing. Developing a monitoring and mitigation matrix for wildlife, wildlife habitat, fisheries, aquatic habitat and watershed recharge values with thresholds and indicators prior to a mineral extraction project supports an upfront plan for oil and gas leasing.

The Coalition sincerely thanks the BLM for their work on the draft RS RMP. We respectfully request that the concepts offered in this letter be considered for incorporation into the BLM's preferred alternative for the draft RS RMP. We look forward to continuing to work with the BLM on this important resource management plan.

Sincerely,

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January 26, 2016

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

RE: Proposal for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following proposal to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision (DRMP). This proposal is specific to the Greater Little Mountain Area (GLMA).

The Coalition is proposing the following resource management prescriptions:

- Implementation of a Master Leasing Plan (MLP) for the GLMA;
- Creation of additional no surface occupancy (NSO)/right of way avoidance (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat and recreational opportunities;
- Maintain existing management in Currant Creek and Red Creek management areas;
- Controlled surface use stipulations (CSU); and
- Management for responsible energy development.

### **Background**

The Coalition is an assembly of sportsmen and women organizations, union members and more than 2,500 concerned hunters, anglers, and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation.

### **Proposal Discussion**

*Master Leasing Plan.* As one of Sweetwater County's and Wyoming's most popular hunting, fishing, recreation and wildlife viewing areas, the GLMA is a perfect place to showcase the Master Leasing Plan (MLP) process and how it meets the MLP criteria set forth by Department of Interior's Instruction

Memorandum (IM) No. 2010-117.<sup>1</sup> IM 2010-117 and subsequent requirements in the BLM's Planning for Fluid Mineral Resources Handbook (H-1624-1, Chapter V) provide the BLM guidance for developing MLPs. In short, the concept is to take a proactive, focused look at oil and gas leasing decisions, displacing the traditional broad planning area-wide leasing decisions that accompany RMPs. In doing so, it effectively provides a specific fluid minerals leasing decision for a defined portion of the planning area that is tiered to the broader RMP.

To be successful, a MLP should include objectives, allowable uses and management actions for a defined portion of the planning area. The MLP components should be compatible with overall planning area goals for the Rock Springs resource area, but they must be distinct and applicable to a defined location, such as the GLMA.

The data provided by the BLM's Reservoir Management Group has identified the GLMA within the Rock Springs Planning Area as very low to low in terms of conventional oil and gas potential for the period 2012-2031<sup>2</sup> (see Map A). This creates a more favorable setting for establishing an MLP within the GLMA. Thus, the BLM should first catalogue and analyze resources and uses that may be impacted by oil and gas development in the Affected Environment Chapter of the DRMP in order to effectively avoid and mitigate impacts to resource values within an MLP area. Then, the BLM should establish resource condition objectives and develop resource protection measures as detailed in H-1624-1, Chapter V.

These elements are critical for a successful MLP for the GLMA. We hope that our suggestions assist the BLM to 1) ensure that an adequate level of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

As noted in our 2010 and 2011 letters (attached) to the BLM,<sup>3</sup> the Coalition believes the GLMA is the ideal place to showcase the MLP process. The MLP concept will serve as a proactive solution to create balanced multiple-use management, reduce stakeholder conflict over time and protect fish and wildlife species.

While the Coalition is concerned about potential direct and indirect long-term impacts from leasing proposals, simultaneously, we are proactive in advocating for responsible energy development in the GLMA. This approach ensures that critical habitat areas have limited surface use from energy development while other areas are open for development using specialized management prescriptions protecting high value ecological resources, recreational opportunities and quality fishing and hunting activities for future generations. We continue to encourage the BLM to consider retiring leases that are due to expire and are located within GLMA resource areas that contain crucial habitat for fish and wildlife. Such actions are supported in the IM 2010-117 and similar actions are recommended in the current GRRMP.

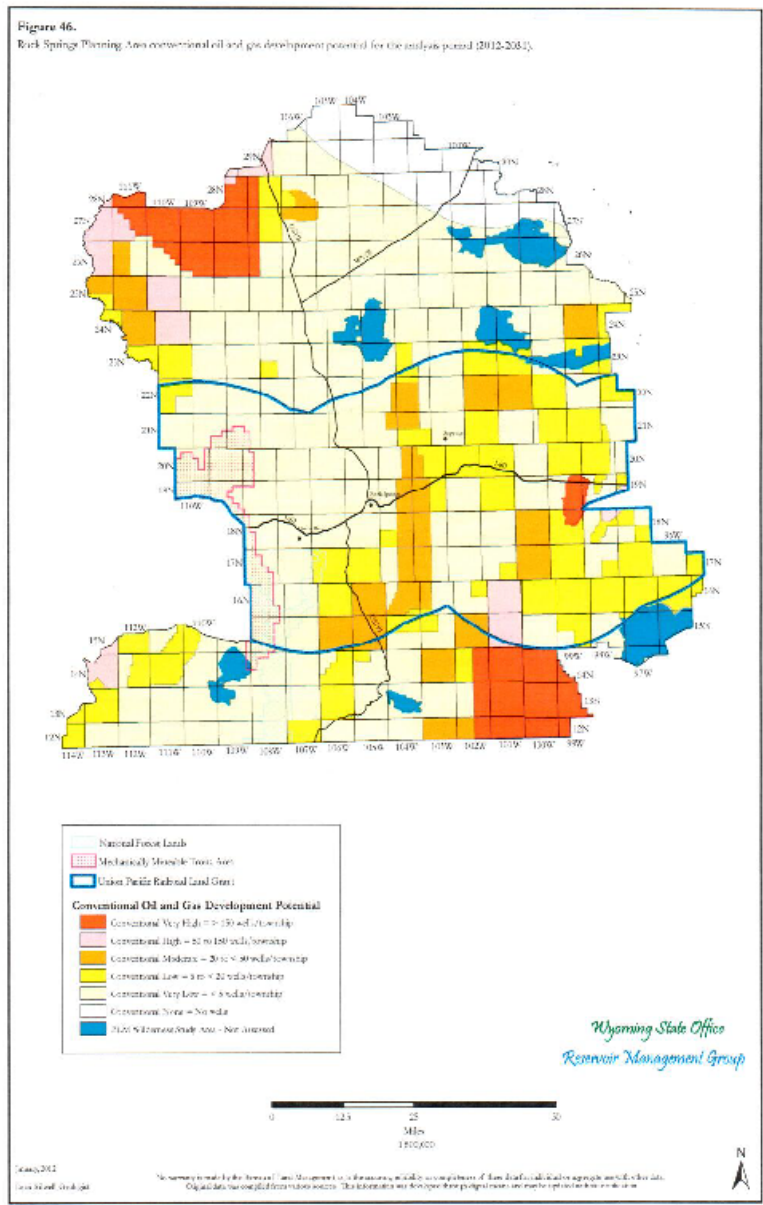
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<sup>1</sup> BLM. 2010. Instruction Memorandum No. 2010-117. Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews. Section II: Master Leasing Plans.

<sup>2</sup> BLM. January 2012. Wyoming State Office Reservoir Management Group – Description of Oil and Gas Potential Analysis in the BLM Rock Springs Resource Planning Area's "Reasonable Foreseeable Development Report for the Rock Springs BLM Resource Management Plan. 2013". Figure 46.

<sup>3</sup> Greater Little Mountain Coalition. 2010. Letter to Don Simpson, Wyoming State Director, BLM regarding *Master Leasing Plan Proposal for Greater Little Mountain Area in Southwest Wyoming*. Dated July 15, 2010. Copy to Lance Porter, Wyoming BLM Rock Springs Field Manager and John Ruhs, Wyoming BLM High Desert District Manager (among others).





Map A. BLM Reservoir Management Group's analysis of conventional oil and gas development for the Rock Springs resource planning area.

*Proposed Resource Protection Areas.* The GLMA contains a diverse and sensitive ecosystem. The current Green River Resource Management Plan (GRRMP) recognizes the unique qualities of the GLMA by providing specific management direction to protect this exceptional area. Over the years, Trout Unlimited, Muley Fanatic Foundation, Rocky Mountain Elk Foundation and the Wyoming Game and Fish Department have completed extensive habitat work within the GLMA that improves fish and wildlife habitat conditions. These partners and others have contributed more than \$3 million to the GLMA since 1990, working with BLM on habitat projects designed to conserve and enhance native cutthroat trout and big game habitat, improve grazing management and provide opportunities for hunting, angling and other outdoor recreation activities. These habitat improvements have increased angling and hunting activities translating to an impressive \$12.7 million in total hunter expenditures in the GLMA in the last

five years and \$48.4 million in angling activities expenditures over the last five years in the GLMA and surrounding Sweetwater County. The GLMA is not only valuable in terms of its habitat component but also in its outdoor recreational economic contributions.<sup>4</sup>

The Coalition appreciates the importance of energy development to the economies of Sweetwater County and the state. Our proposal recognizes current mineral leaseholders and does not affect their valid existing rights. Our proposed recommendations are for all new leasing activities.

*Sugarloaf Basin Special Management Area—No Surface Occupancy*

The importance of the Sugarloaf Basin Special Management Area (SMA) to trout and other fish has increased over the years due to sensitivity of the Marsh Creeks watershed to soil erosion. The Marsh Creeks flow directly to Flaming Gorge Reservoir, and could be a significant contributor to the increasing levels of siltation and sedimentation to the reservoir if surface impacts are not avoided. In addition, the SMA is a known groundwater recharge area, providing local aquifers important water supplies for plants, springs and streams in the area. The addition of roads (from energy development activities) can create hard surfaces that prevent rain and snow from soaking back into the ground and replenishing these valuable groundwater recharge zones.

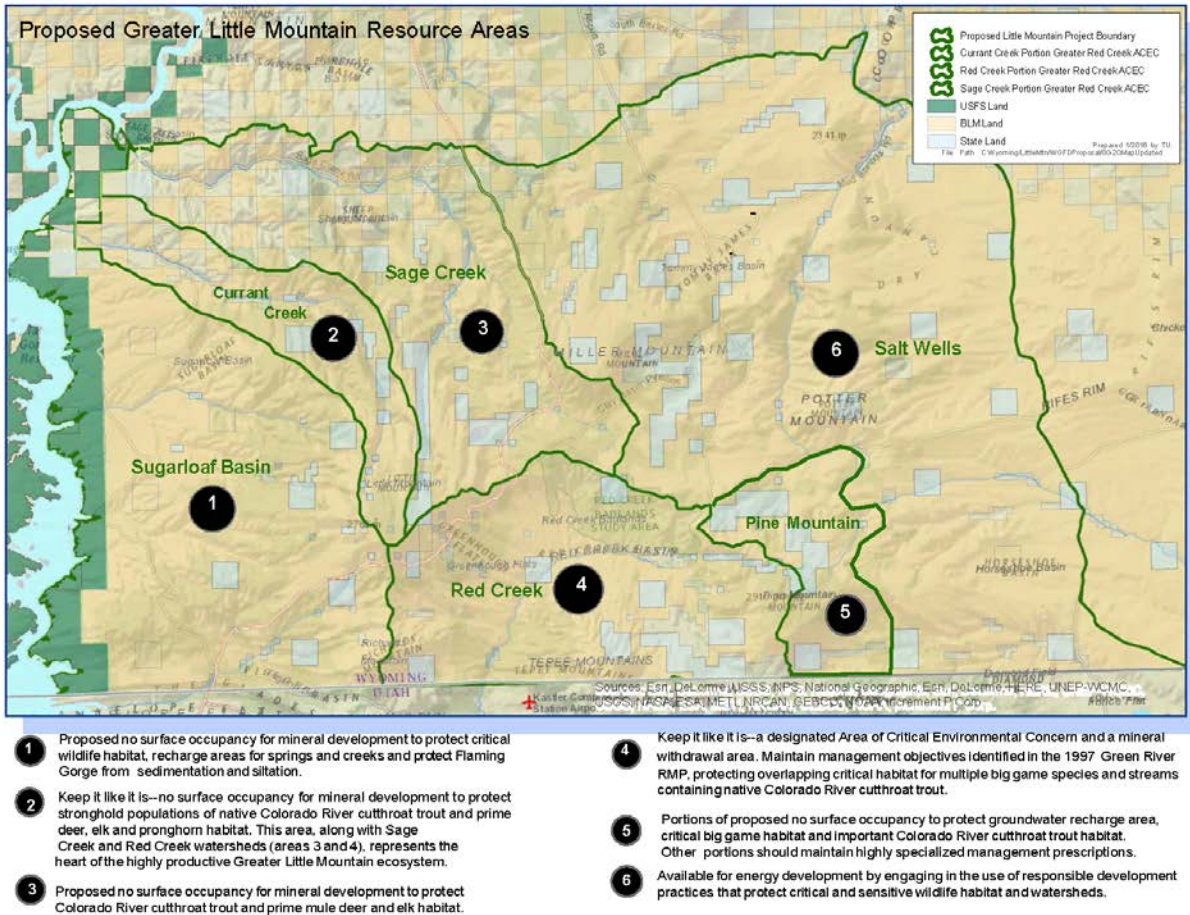
The Marsh Creeks complex is a series of short, first order perennial streams that flow directly into Flaming Gorge Reservoir. We recommend NSO in the area to prevent surface disturbance (through roads, well pads, heavy vehicle use, etc.) that creates and thus conveys large amounts of sediment into Flaming Gorge. Incorporating more restrictive management options will minimize the amount of cumulative phosphorus loading and eutrophic conditions in the reservoir and help to protect the important and popular recreational fishery. In addition, the short distance each of the Marsh Creeks travel before entering the Gorge heightens the vulnerability of these watersheds, not just to sediment loading, but real significant threats of a petroleum spill escaping and reaching the reservoir before being noticed or contained. These potential issues could have direct impacts on the Gorge's salmonids and other sport fish populations.

The Sugarloaf Basin SMA also provides crucial winter-yearlong habitat for mule deer, elk and pronghorn antelope. In addition, a portion of the SMA is designated Greater sage-grouse core habitat while other portions contain habitat for midget-faded rattlesnakes, a sensitive species in Wyoming. Finally, the SMA provides a significant Utah juniper habitat complex, supporting an assemblage of juniper-obligate mammal and bird species.

Because of the important reasons described above, the Coalition is proposing NSO for mineral development in the SMA to protect critical wildlife habitat, groundwater recharge areas for springs and creeks and the Flaming Gorge Reservoir from sedimentation and siltation.

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<sup>4</sup> Economics and harvest data for the GLMA and Sweetwater County compiled by Trout Unlimited using BLM, Wyoming Game and Fish Department and Sweetwater County data.



Map B. Greater Little Mountain resource areas depicting proposed alternative for consideration in the Rock Springs BLM Draft Resource Management Plan.

Currant Creek Portion of the Red Creek ACEC – Maintain Existing Management

The Current Creek watershed is currently managed as NSO under the current GRRMP and is part of the Greater Red Creek ACEC (Area of Critical Environmental Concern). The Coalition recommends this management objective (for mineral development) be maintained. Currant Creek is one of the numerous streams in the GLMA that provides an important stronghold for conservation populations of native Colorado River cutthroat trout (CRCT) as these populations are located in one of the driest regions of CRCT’s historic range and are the only remaining population that still occupies this semi-arid zone<sup>5</sup>. Considerable habitat work has occurred in this watershed to improve and stabilize this sensitive stream. In addition, the area contains critical big game habitat for elk, mule deer and pronghorn antelope. Maintaining current management will result in the continued improvement of healthy fish and wildlife habitat.

Sage Creek Portion of the Red Creek ACEC – No Surface Occupancy

The Sage Creek portion of the Greater Red Creek ACEC should be managed as NSO for mineral development in order to protect sensitive CRCT habitat and elk and mule deer crucial winter and parturition areas. Due to the highly erodible nature of the soils in this area, surface disturbing activities

<sup>5</sup> Trout Unlimited. 2009. Internal white paper titled “Analysis of the Potential Impacts of BLM Proposed Oil and Gas Development Leases on Colorado River cutthroat trout in the Little Mountain Area of Wyoming.” Amy L. Haak. January 2009.

will increase the sedimentation problem the drainage is currently experiencing. Under the Coalition’s proposal, the Sage Creek management area would be strengthened from the current level of management objectives identified in the GRRMP by increasing protective measures for critical habitat for CRCT and big game species.

#### Red Creek ACEC—Maintain Existing Management

The Red Creek watershed and entire landscape is a designated ACEC and a mineral withdrawal area. The Coalition supports maintaining the continued management objectives for this unique place due to its importance of overlapping crucial habitat for multiple big game species and streams containing conservation populations of CRCT.

#### Pine Mountain Management Area—Part NSO-Part Special Management Guidelines

The Pine Mountain Management Area is a designated management area in the GRRMP because of its significant fish and wildlife habitat. The Coalition recommends that a portion of the Pine Mountain MA be designated NSO in order to protect groundwater recharge areas, crucial big game habitat and important CRCT habitat. Outside of the proposed NSO, the Coalition supports mineral leasing with specialized management prescriptions such as CSU stipulations, utilization of mandatory best management practices, potential implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department’s “Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat.”<sup>6</sup>

#### Salt Wells Resource Area—Responsible Energy Development Practices

Engaging in the use of responsible development practices that protect crucial and sensitive wildlife habitat and watersheds should remain at the forefront of any current or proposed management actions and objectives. The Salt Wells Resource Area contains crucial wildlife ranges, steep erodible slopes and high recreational value for elk and mule deer hunting. The area is also important to existing and future oil and gas production in Sweetwater County. Based on a specific scientific review of the GLMA, the Coalition supports removing big game timing stipulations on development in the Salt Wells Resource Area so long as NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area, and a portion of Pine Mountain, and the management prescriptions for Sage Creek and Red Creek remain the same.

Development proposals should be vetted through the Wyoming Game and Fish Department to determine best placement for well pads and associated structures. The BLM should highlight the need for industry to use gold book standards for reclamation and maintenance of native vegetation.

### **Summary**

The GLMA continues to provide some of the best hunting and angling for residents and non-residents alike, offer abundant opportunities for outdoor recreation, is an important contributor for livestock operations, a significant economic engine for outdoor recreation in the County and provides energy development opportunities for a variety of energy resources. Like many landscapes in the West, research is proving that increased development of our valuable natural resources impacts fish and wildlife habitats. Much of the GLMA is leased and the Coalition believes development can be completed responsibly in identified areas using a Master Leasing Plan component. With the application of new technologies, impacts to our waters and landscapes can be minimized. However, there are places that should be

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<sup>6</sup> Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

conserved and protected that provide the life support essential for fish and wildlife. For these reasons, we ask that the BLM apply NSO stipulations to Sugarloaf Basin, Sage Creek and portions of Pine Mountain and maintain existing management in Red Creek and Currant Creek. To help strike a balance, we would then support relaxation of timing stipulations in the Salt Wells area.

The Coalition requests that our proposed recommendations be included in the proposed action and preferred alternative currently being formulated for the Draft RMP. We look forward to working with the BLM on this important resource document.

Sincerely,

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Josh Coursey  
Muley Fanatic Foundation

Steve Martin  
Bowhunters of Wyoming

Nick Dobric  
Theodore Roosevelt Conservation Partnership

Attached in pdf: GLM Coalition 2010 Letter to the BLM on MLPs in the Greater Little Mountain Area



June 10, 2011

Don Simpson  
State Director, Bureau of Land Management  
Wyoming State Office  
5353 Yellowstone Road P.O. Box 1828  
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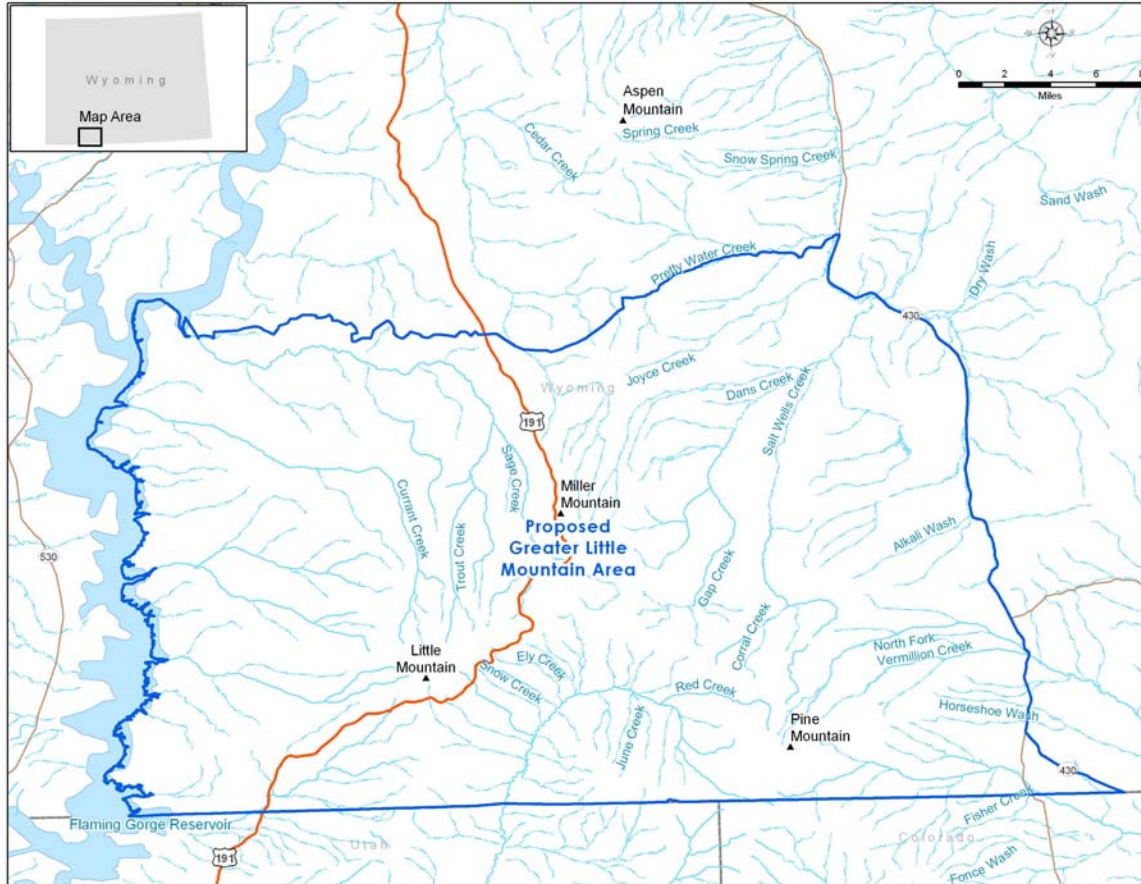
RE: April 1, 2011 response letter to MLP recommendations

Dear Mr. Simpson,

On behalf of the Greater Little Mountain Coalition we thank you and your staff for responding to our Master Leasing Plan Proposal for the Greater Little Mountain Area (GLMA). We appreciate the time and energy that was spent analyzing our proposal as well as others throughout the state. Based on your response letter and reading the Wyoming Oil and Gas Leasing Reform Implementation Plan we understand that you “expect” to incorporate MLP analysis of the Greater Little Mountain Area into the RMP revision process.

We understand that this is a new process for all of us and wanted to take this opportunity to express our willingness to work collaboratively with the BLM, and other stakeholders, to ensure that this becomes a useful part of the land use planning process. Since the BLM first created the MLP concept we felt it could be an effective way to reduce stakeholder conflict and to manage the GLMA on a landscape scale for the benefit of all.

Since we are identified as the MLP proponents for the GLMA in the Leasing Reform Implementation Plan we wanted to make a couple of clarifications regarding our proposal and the implementation plan. Of greatest significance the implementation plan uses two different maps for the Greater Little Mountain boundary. The first map is contained in the executive summary under “Wyoming Category 2 Nominations” and this boundary is consistent with the boundary map submitted in our MLP proposal (Map A). The second map is figure 15 on page 42 of the implementation plan and is not the same map we submitted with our proposal. The difference in these two maps has the following ramifications.



**A. MLP boundary proposed by Greater Little Mountain Coalition**

The map on page 42 contains all of the checkerboard land south of I-80, to the border and between Flaming Gorge and Highway 430. The map submitted by the Greater Little Mountain Coalition uses the same West, East and Southern boundaries but uses the bottom of the checkerboard for the Northern boundary. The checkerboard area in question falls outside the area of focus for the Coalition. For this reason we would like to clarify that we are not proposing an MLP analysis for the portions of checkerboard contained within the map on page 42 of the Leasing Reform Implementation Plan.

Additionally, the map on page 42 was used in the Leasing Reform Plan for all of the analysis of the Greater Little Mountain MLP. This resulted in data that is drastically different than what was presented in our proposal and potentially how it has been considered. For example, when using the map on page 42, that includes the checkerboard, to determine if the GLMA meets the MLP criteria in IM 2010-117, you are correct in saying that only 24 percent of the acreage is unleased (Leasing Implementation Plan p.41). However, when you use the map we submitted and that you use in your executive summary, 47 percent of the area is unleased. These percentages paint a different picture of how the area fits within the criteria. While determining if the area meets the MLP criteria may be a mute point at this time we feel it is important to note that there are distinct differences in how each map relates to the criteria. It was our belief that when using the map on page 42 the area was not well suited to a MLP analysis, but that when the checkerboard is removed the area is well suited to a MLP analysis. As you move forward implementing MLP analysis for the GLMA we recommend that you clarify which boundary will be used.

We would also like to offer our support in developing a plan for implementing the MLP analysis for the GLMA and would appreciate if you would inform us of any plans for how this process might occur. For instance, timelines, communication strategies, how the MLP will be wrapped into the RMP process and how the public will be involved are examples of information that interest the Coalition. Through continued collaboration we hope to be a positive partner in implementing a MLP for the GLMA that will result in greater certainty for stakeholders and ensuring that the areas multiple resources are managed in a balanced manner.

Thank you for your time and consideration.

Respectfully representing the Greater Little Mountain Coalition,

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cc: Bob Abbey, BLM Director  
Larry Claypool, Deputy State Director, Minerals and Lands  
John Ruhs, Wyoming BLM High Desert District Manager  
Lance Porter, Wyoming BLM Rock Springs Field Office Manager  
Trisha Cartmell, Petroleum Engineer, Rock Springs BLM  
Vera-Lynn Harrison, Project Manager, Rock Springs RMP





July 15, 2010

Mr. Don Simpson, Wyoming State Director  
Bureau of Land Management  
5353 Yellowstone Road  
P.O. Box 1828  
Cheyenne, Wyoming 82003

**Re: Master Leasing Plan Proposal for Greater Little Mountain Area in southwest Wyoming**

Dear Mr. Simpson:

The Greater Little Mountain Coalition applauds the recent energy policy revisions pertaining to the Onshore Oil and Gas Leasing Reforms (Instruction Memorandum No. 2010-117). These reforms bring some much needed balance back to our oil and gas leasing and development programs. As these reforms are implemented within each state office, it is imperative to ensure that these concepts are put into action.

With this in mind, the Greater Little Mountain Coalition (referred to as Coalition) would like to be an active participant in developing ideas to aid in the implementation of these leasing reforms. We are particularly interested in the Master Leasing Plan (MLP) concept as it is a strong mechanism that incorporates the needed balance by identifying areas that would benefit from further evaluation, scientific analysis, and updated management actions. Our letter to you today offers a proposal for consideration of a pilot project using the MLP concept.

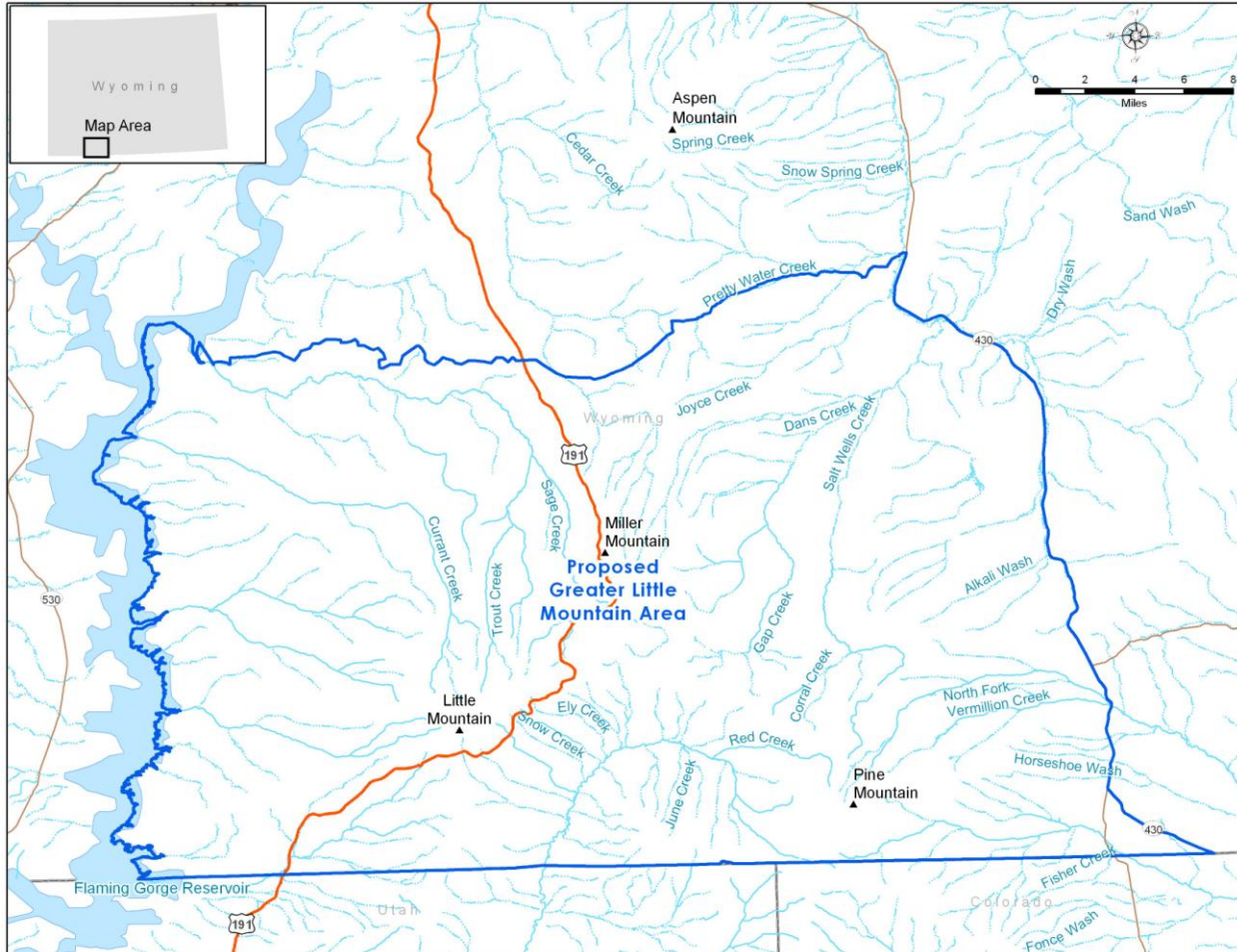
Our Coalition believes the Greater Little Mountain Area (GLMA) is a perfect place to showcase the MLP process. The GLMA is a unique landscape of BLM lands in southwest Wyoming that not only meets the criteria for an MLP, as described in the IM, it also has a number of other unique circumstances that make it a prime candidate for a MLP designation. This concept will serve as a proactive solution to create balanced multiple use management, reducing stakeholder conflict over time.

For the last three years, our Coalition of sportsmen groups, labor union members, local anglers and hunters, citizens and businesses have been working to advocate for responsible energy development in the GLMA. Additionally, the Governor of Wyoming, local, county and city government, industry and more traditional interests like livestock operators have all voiced a desire for a balanced multiple use solution in the GLMA. This combination of interests are coming together in a way which presents an opportunity for delineating areas where energy development is not appropriate, areas where specified stipulations dictate how development will occur, and areas that use responsible energy development practices.

It is clear that the existing Green River Resource Management Plan (GRRMP) for the Rock Springs BLM office is outdated, having been completed in 1997. However, the field office just received funding to revise the plan. A public notice is said to be released in November of 2010. If an MLP is initiated for the GLMA, it could be combined with the GRRMP revision rather than as an RMP amendment. Without comprehensive analysis that incorporates current resource science and management scenarios, along with a landscape scale look at this special area, we feel that the GLMA will be placed in jeopardy. It is our recommendation that the GLMA be considered for a Master Leasing Plan.

**PURPOSE:** The MLP concept represents a great opportunity to take a landscape scale approach to leasing and development of oil and gas resources in important natural resource areas prior to an area being leased. It is our belief that the GLMA in southwest Wyoming (Map A) meets the MLP criteria set forth by IM No. 2010-117 and would be a great place to showcase this concept.

The Coalition believes this mechanism could resolve or greatly reduce future public land management conflicts among the numerous stakeholders. A landscape scale review that accounts for cumulative impacts followed by a balanced multiple use strategy for the region will consider the multitude of energy activities that have the potential to impact this area. With natural gas drilling activities up by more than 900 rigs, compared to this time last year, it seems obvious that there is increased interest in developing natural gas. In addition, with increased interest in developing wind energy and other resources in the GLMA, a more proactive management scenario suggests that the MLP would be a prudent course of action. Increases in energy development in this area could potentially mimic the conflict among various stakeholders (i.e., ranchers, hunters, anglers, community, wildlife advocates, and businesses) within the Pinedale, Wyoming resource area, such as loss of wildlife habitat, loss of animal unit months (AUM) for ranchers, big game population declines, sage grouse impacts, and water and air quality concerns. By implementing a MLP in the GLMA prior to further development, stakeholders will have increased buy-in in the long-term management of the area, and hopefully avoid many of the conflicts we have seen in other areas of Wyoming.



**Map A. Greater Little Mountain Area Boundary Map**

**CRITERIA:** Below are the BLM’s four criteria for the preparation of a MLP and our supportive rationale for a MLP in the GLMA. In addition, the following information can aid the Wyoming BLM office in writing their Implementation Plan and timeline for accomplishing those tasks outlined in the IM and due August 16, 2010 to the Washington office.

**Criteria 1:** *A substantial portion of the area to be analyzed in the MLP is not currently leased.*

The GLMA includes lands north of the Colorado and Utah border, east of the Flaming Gorge Reservoir, west of highway 430 and south of the checkerboard (Map A). To be more specific, the GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased and of that 74,585 acres (14%) are held in production. The IM does not define “substantial” and the Coalition would like to suggest that this first criterion be given some broad leeway. This terminology becomes more unclear when, under Criteria 2, the word "majority" is used to describe how much federal mineral interest is held in an area. Using the word “substantial” in Criteria 1 shows a clear intent to set a lower threshold for the standard used

when applied to the area leased. When compared to “majority” this means that a “substantial” threshold could be met with less than 50% of the area being un-leased.

As Director of this state’s BLM agency, you are very aware that a majority of BLM lands in Wyoming and most of the West have been leased during the last ten-year period. However, not all have been developed. In addition, a significant portion of the leased parcels within the GLMA have expired this spring or are due to expire over the next few years. These expiring leases will increase the percentage of un-leased lands over time. We understand that not all of these leases will necessarily expire. However, given that many leases in the area have expired in the past couple of years we feel it is an important statistic that adds to our case that a “substantial” portion of the area is un-leased. We are not advocating a particular outcome for these leased areas but simply providing reasoning for why the GLMA meets the MLP criteria. For clarification, a BLM primary lease term is 10 years and will continue beyond that primary term if oil and gas is produced in paying quantities. The following data in Table 1 represent leases projected to expire in the coming years within the GLMA. Note that many of these leased acreages lie within sensitive and critical fish and wildlife habitat, highlighting our interest in these particular leases.

<b>Year</b>	<b>Projected Acres Expiring</b>	<b>Percent of Projected Acres Expiring based on GLMA total acreage</b>	<b>Percent of Projected Acres Leased within GLMA</b>
<b>2010</b>	<b>49,191 acres</b>	<b>9%</b>	<b>Leaving 44% of the GLMA leased</b>
<b>2011</b>	<b>40,387 acres</b>	<b>7%</b>	<b>Leaving 37% of the GLMA leased</b>
<b>2012</b>	<b>1,989 acres</b>	<b>0.3%</b>	<b>Leaving 37% of the GLMA leased</b>
<b>2013</b>	<b>46,204 acres</b>	<b>8.8%</b>	<b>Leaving 28.2% of the GLMA leased</b>

**Table 1. Oil and Gas Lease Parcels Projected to Expire**

While there has been significant leasing in this area, there has been relatively little development. Since 2008, just one well has been drilled within the boundaries of the GLMA, creating a further need for a comprehensive leasing and development plan that the MLP concept would provide.

The following table (Table 2) illustrates the amount of acreage under lease within several of the highly sensitive fish and wildlife areas in the GLMA. These areas have been identified as special designated areas in the GRRMP of 1997. Our interest includes those acreages in the Sage Creek ACEC, the Currant Creek ACEC, the Red Creek ACEC, Pine Mountain SMA, and the Sugarloaf Basin SMA, which totals 275,820 of Federal GIS acres. Many lease parcels within the identified areas are currently under review by the BLM and according to the IM it is entirely appropriate to apply this new policy to such parcels.

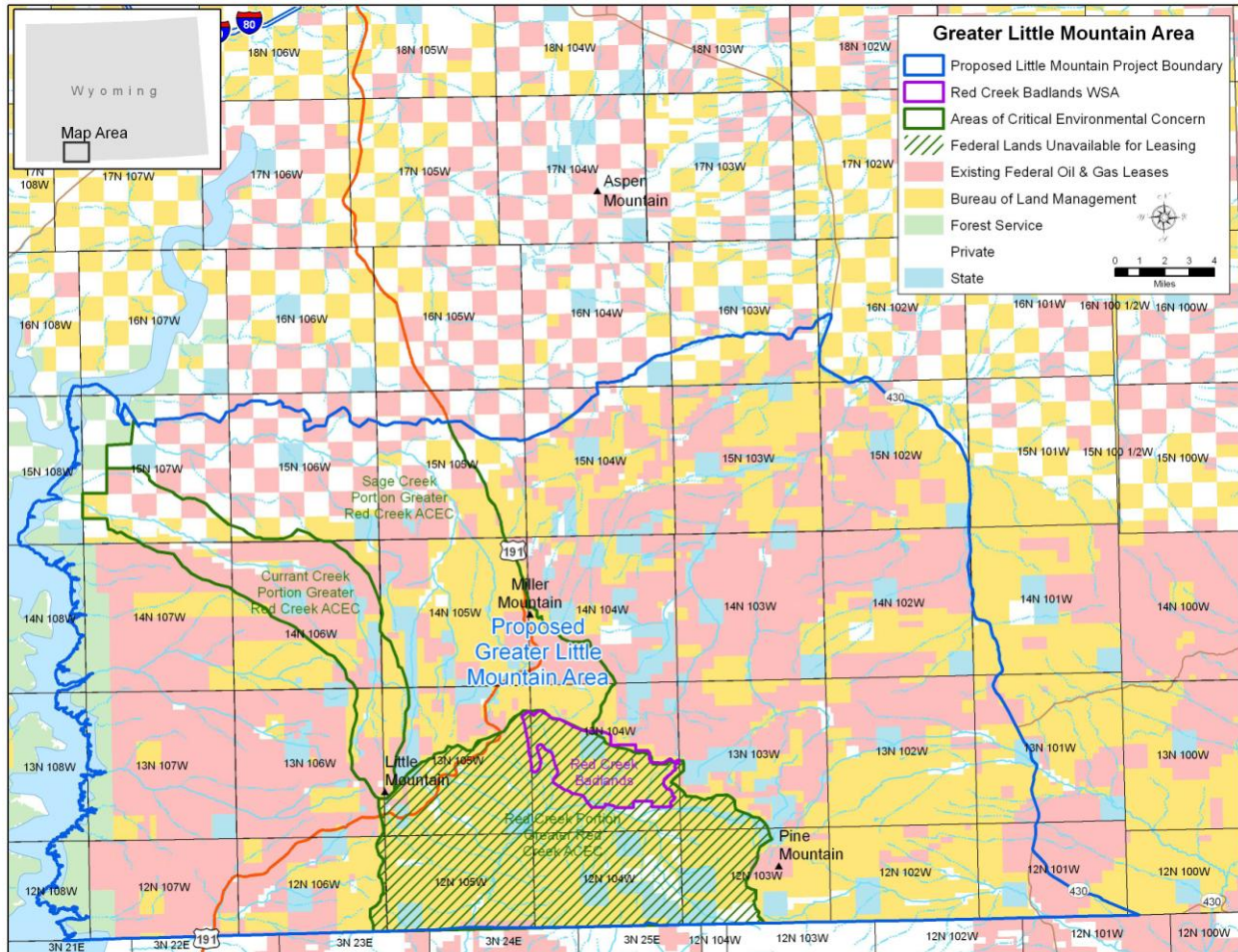
	<b>Federal Acres (GIS)</b>	<b>GR RMP Acres (plats)</b>	<b>No O&amp;G Leasing Areas</b>	<b>NSO Acres</b>	<b>CSU Acres</b>	<b>Acres Leased to Oil and Gas</b>	<b>% Acres Leased</b>	<b>Comments</b>
<b>Red Creek Wilderness Study Area</b>	<b>8,051</b>	<b>8,020</b>	<b>8,051</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0</b>	
<b>Sage Creek Portion of the Greater Red Creek ACEC</b>	<b>52,199</b>	<b>52,270</b>	<b>-</b>	<b>-</b>	<b>52,199</b>	<b>31,698</b>	<b>61%</b>	<b>Northern Portion is within checkerboard</b>
<b>Current Creek Portion of the Greater Red Creek ACEC</b>	<b>25,924</b>	<b>23,740</b>	<b>-</b>	<b>25,924</b>	<b>-</b>	<b>17,171</b>	<b>66%</b>	<b>Northern Portion is within checkerboard</b>
<b>Red Creek Portion of the Greater Red Creek ACEC</b>	<b>47,696</b>	<b>55,880</b>	<b>46,226</b>	<b>-</b>	<b>-</b>	<b>1,470</b>	<b>3.10%</b>	<b>Leases pre-date WSA</b>
<b>Pine Mountain Special Management Area</b>	<b>62,758</b>	<b>64,200</b>	<b>-</b>	<b>-</b>	<b>62,758</b>	<b>56,007</b>	<b>89%</b>	<b>-</b>
<b>Sugarloaf Special Management Area</b>	<b>87,243</b>	<b>85,880</b>	<b>-</b>	<b>1,600</b>	<b>85,643</b>	<b>74,896</b>	<b>86%</b>	<b>-</b>
<b>Remaining BLM Lands within GLMA</b>	<b>150,601</b>	<b>144,482</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>97,069</b>		
<b>State and Private Lands within GLMA</b>	<b>87,764</b>	<b>87,764</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>		
<b>Total</b>	<b>522,236</b>	<b>522,236</b>	<b>54,277</b>	<b>27,524</b>	<b>200,600</b>	<b>278,311</b>		

**Table 2. Greater Little Mountain Area Acreage**

*\*The acreages presented above are subject to slight variations due to differences in GIS layers.*

**Criteria 2: *There is a majority Federal mineral interest.***

The BLM manages a majority of the GLMA (83%) and nearly all of the mineral interests in this area are federally owned. The GRRMP FEIS, Map B, shows this ownership. Our Coalition has also created a map (Map B) to view mineral interest designation.



**Map B. GLMA Mineral Interest Designation**

**Criteria 3: *The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the area.***

The GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased by oil and gas companies and of that 74,585 acres (14%) are held in production. From January 2008 through January 2010, five BLM WY Oil and Gas Competitive Lease Sales have included parcels within the sensitive areas of the GLMA. Due to protests from sporting groups, conservation organizations, citizens and the Governor, parcels within the GLMA were deferred from issuance in three of those five sales until further environmental analysis could be completed. In addition, the upcoming lease sale on August 3, 2010 is offering four leases totaling

6,361 acres (of which 6,161 acres are within the GLMA boundary) near the Potter Mountain Elk Butte region of the GLMA. We request that the BLM reevaluate the adequacy and environmental analysis, including the new lease parcel review process and issuance of leases for this August 2010 lease sale. This would provide a case example for which you could include in your Implementation Plan to the Washington office.

Also since 2008, the BLM has approved Devon Energy's Baxter Natural Gas Drilling proposal (EA FONSI), the Rubicon 3D Seismic Survey proposal (also Devon's) (EA FONSI), the Horseshoe Basin 3D Seismic Survey proposal (EA FONSI), and is in the process of writing the final environmental assessment for the North Dutch John 2D Seismic Survey proposal (Azalea Oil Co.). All of these projects are located within the GLMA. Finally, Devon Energy had approval to drill two exploratory wells in their Baxter Natural Gas southern platform in late 2008. Devon drilled one well in 2008 with a result of both oil and gas deposits in significant quantities. Devon Energy has yet to drill the second well that was approved within the Trout Creek drainage.

**Criteria 4: *Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are the following:***

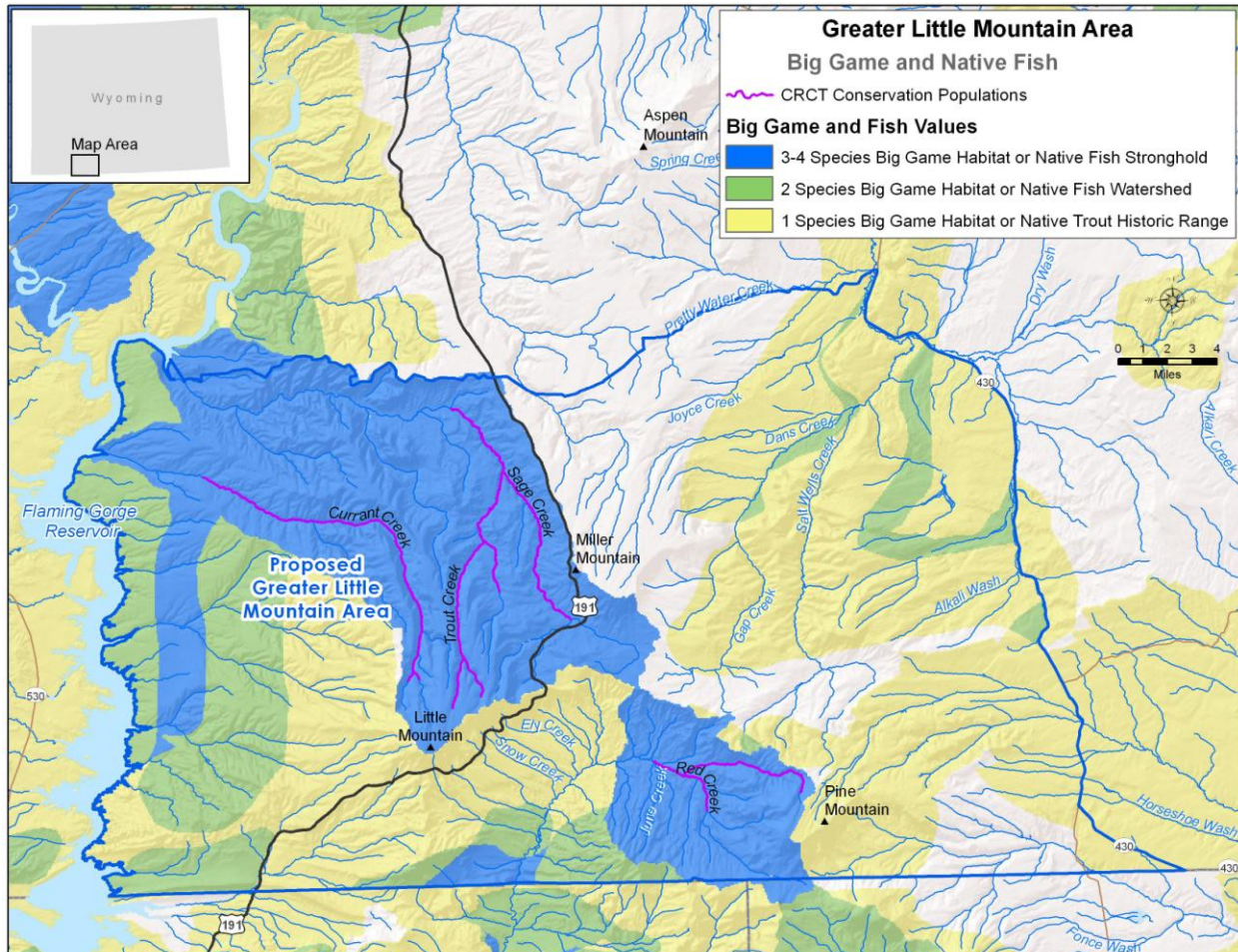
- ***Multiple-use or natural/cultural resource conflicts***

Both the Wyoming Game and Fish Department and the Governor of Wyoming have been very vocal in their opposition to further lease sales and oil and gas projects in sensitive fish and wildlife habitats within the GLMA. Indeed, the BLM has long recognized the outstanding fish and wildlife resource values of this area as described in the GRRMP and evidenced by the over \$2 million worth of habitat improvement projects that have been initiated here since 1990. The BLM contributed the largest amount at \$1,652,814 and the Wyoming Game and Fish Department spent the second largest amount at \$341,174, while other contributors interested in protecting and improving this area included Trout Unlimited, Rocky Mountain Elk Foundation, National Fish and Wildlife Foundation, Bowhunters of Wyoming, local donors, and others.

The GRRMP of 1997 recognized the significance of the valuable resources in this area. Establishments of No Surface Occupancy (NSO) stipulations, Controlled Surface Use (CSU) areas, no lease areas, and rights-of-way exclusion and avoidance areas exist in the GRRMP for large portions of this landscape. As earlier described, the BLM designated several Areas of Critical Environmental Concern (ACEC) containing important watersheds and wildlife habitat (Carrant Creek, Sage Creek and Red Creek ACEC's). Additionally, the Red Creek Badlands Wilderness Study Area (WSA), the Pine Mountain Special Management Area (SMA), and the Sugarloaf Basin Special Management Area also exist within the GLMA.

The GLMA is a biologically rich landscape with abundant and diverse terrestrial and aquatic species. Some of the species include: elk, mule deer, antelope, sage grouse, mountain lion, black bear, numerous raptors (such as the Bald Eagle and the Ferruginous Hawk), and waterfowl. Overlapping critical winter habitat for elk, mule deer, pronghorn, along with yearlong big game habitat, exist in significant quantities (Map C). Migration routes for big game crisscross the GLMA and important breeding and rearing habitat for sage grouse exist. Portions of the

landscape are within Wyoming's Sage Grouse Core Area designated by Governor Freudenthal's Sage Grouse Implementation Team. And the entire area is within the Rock Springs BLM Field Office that is involved in the National Environmental Policy Act (NEPA) process for Instruction Memorandum (IM) 2010-012 and 2010-013 to revise sage grouse and sagebrush management direction in their resource management plans.



**Map C. GLMA Big Game and Native Fish Strongholds**

Colorado River cutthroat trout (identified as a Sensitive Species and a Species of Greatest Concern by the State of Wyoming and the BLM) are located within Upper Sage Creek, Curreant Creek, Trout Creek, Red Creek, Gooseberry Creek, and Little Red Creek within the GLMA. Map C illustrates the significance of the specific high value fish and wildlife areas in the GLMA. Highly fragile and sensitive soils, subject to erosion, sedimentation, and washouts from sudden event storms, natural or manmade fires, or from heavy road traffic occur in this area. Current and past sedimentation and erosion events have impacted both the streams and riparian areas in addition to Flaming Gorge itself. This directly impacts future population survival of Colorado River cutthroat trout. The hydrology in this area represents an important groundwater recharge



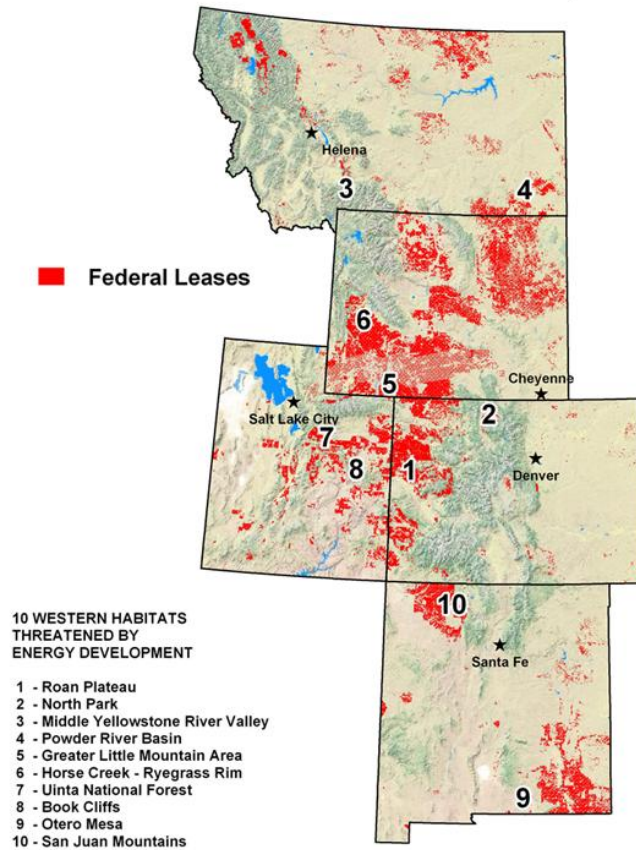
area for the numerous springs and coldwater streams in addition to providing the much needed water for wildlife in this high desert environment.

The GLMA also includes unique habitat for other state and federally recognized sensitive and threatened or endangered wildlife species such as the Pygmy Rabbit and the Midget-faded rattlesnake. Because of the contrasting aspen mountain community, juniper woodland and high desert sagebrush steppes, several raptor species occupy the GLMA that are considered as special status species, which include the Ferruginous Hawk, Golden Eagle, and the Bald Eagle.

The GLMA is a significant source for hunting and fishing opportunities for the public and simultaneously provides a vital role in contributing to the economic diversity for communities within this region. Flaming Gorge borders the western portion of the GLMA and is one of the largest reservoirs in the state. Obtaining the highly prized limited quota big game licenses in this area is often a life-long pursuit by the residents of Sweetwater County and the state. In fact, the GLMA is one of three most popular elk hunting spots in the state, the most popular deer area for both non-resident and resident hunters, and is an outstanding outdoor and backcountry recreation area.

In 2009, Sportsmen for Responsible Energy Development (SFRED) designated the GLMA as one of their top 10 western habitats threatened by energy development (Map D). It was chosen because of the area's ecologically balanced components, world class wildlife (both aquatic and terrestrial) that inhabit the GLMA. Conversely, this area is also valuable from a minerals perspective and as earlier discussed, more than 50% of the area is leased to oil and gas companies that have the right to develop those parcels. This combination leads to a natural/cultural resource conflict and calls for a plan that will mitigate this conflict. To date, leasing and development in this area have taken a case-by-case approach and a large landscape scale analysis has not been performed to address the likely cumulative impacts.

Public Land Leased for Oil and Gas Development



**Map D. Top 10 Western habitats on public lands threatened by oil and gas development (SFRED map 2009).**

- ***Impacts to air quality.***

The GLMA is composed of Class II, III, and IV visual airsheds. None of the recently approved projects within the GLMA were thoroughly evaluated for future air or greenhouse gas emissions or climate change impacts. New NEPA guidance will require this evaluation and the establishment of environmental mitigation commitments will need to be implemented. For this region of Wyoming, significant air quality issues exist with airsheds being compromised. Quantification of cumulative emissions over the life of the projects proposed for this area need to be considered and completed.

- ***Impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or Impacts another specially designated areas.***

As mentioned earlier, the GLMA contains three ACEC's, two SMA's and one WSA. Impacts to these special areas from oil and gas development and other cumulative impacts could be significant and would include air quality, water quality, and surface impacts.

## **OTHER CIRCUMSTANCES:**

### ***A. Identifying and Evaluating Potential Resource Conflicts in a MLP***

The following provides a non-exhaustive list of potential resource conflicts that should be considered when developing an MLP. All of the items listed under Section A, page 2 of IM 2010-117 are of concern for the GLMA. We have attempted to illustrate many of those in the previous discussion above. Potential resource conflicts that are not mentioned, but should be, include alternate and renewable energy development within the area.

This section of Wyoming has been identified as a significant area for oil shale development. It is also being considered for carbon sequestration projects, a water pipeline project from the Green River to the Colorado's front range, and has significant wind development opportunities. These potentially conflicting resource development issues need to be addressed. The impacts from numerous energy development projects on the surface and subsurface areas significantly increase the potential impacts to fish and wildlife.

### ***B. Potential MLP Decisions.***

The following examples identified in Section B on page 2 of IM 2010-117 include other planning decisions that may be made through the MLP process with supporting NEPA analysis. The approach and outcomes described in the IM mirror the type of analysis and approach we have been advocating for in the GLMA. The IM calls for resource protections identified through the MLP to be addressed as new or modified plan decisions that may include lease stipulations for new leases and/or closing certain areas to leasing. The GLMA recognizes that the 1997 GRRMP has designated specific stipulations for much of the GLMA that include NSO, Timing Limitations, Controlled Surface Use, planned unitization, and the implementation of best management practices in certain cases. Despite these fairly restrictive stipulations in recognition of the high value of this area, leasing of the lands occurred in these sensitive areas anyway.

However, the GRRMP is outdated in its energy resource information, lacks detailed discussion for phased leasing and development, as well as any requirements for the capture or reduction of air emissions, liquid gathering systems, multiple well installation, or caps on new surface disturbances. These items all represent recent management efforts at mitigation on federal lands in the West. The Coalition feels that by implementing the MLP in the GLMA, these planning decisions can be incorporated.

**SUMMARY:** The GLMA is uniquely positioned to utilize the Master Leasing Plan concept. An MLP in this area will serve as a positive solution which can guide energy development in a balanced manner for years to come. By strengthening guidelines for development of areas where no leasing and/or surface occupancy is appropriate, areas where stipulations and best management practices are appropriate, and areas where responsible energy development practices are acceptable, we can cooperatively create a strategy that will manage the numerous valuable resources of the GLMA while allowing for responsible energy development.

We thank you for this opportunity to present our reasoning for implementing a Master Leasing Plan in the Greater Little Mountain Area. We are available for any further assistance or involvement.

Respectfully representing the Greater Little Mountain Coalition,

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