



April 4, 2011

*Sent via email to RockSpringsRMP\_WY@blm.gov*

Vera-Lynn Harrison  
Rock Springs RMP Project Manager  
280 Highway 191 North  
Rock Springs, WY

**RE: Rock Springs Resource Management Plan Revision Scoping Comments**

Dear Ms. Harrison,

Thank you for the opportunity to provide scoping comments on the Rock Springs Field Office's (RSFO) Resource Management Plan (RMP) revision. The Greater Little Mountain Coalition (Coalition) offers these scoping comments in an effort to identify issues and provide solutions for the new resource management plan.

The Coalition is made up of local, statewide and national groups representing sportsmen and women including: Wyoming Wildlife Federation, Trout Unlimited, Muley Fanatic Chapter of the Mule Deer Foundation, Theodore Roosevelt Conservation Partnership, Bowhunters of Wyoming, Sportsmen for Responsible Energy Development and United Steelworkers Local 13214. All of these groups and their members are concerned for the long-term viability of wildlife, fisheries and outdoor recreation within the Greater Little Mountain Area, which makes up about a half million acres of the RSFO focus area.

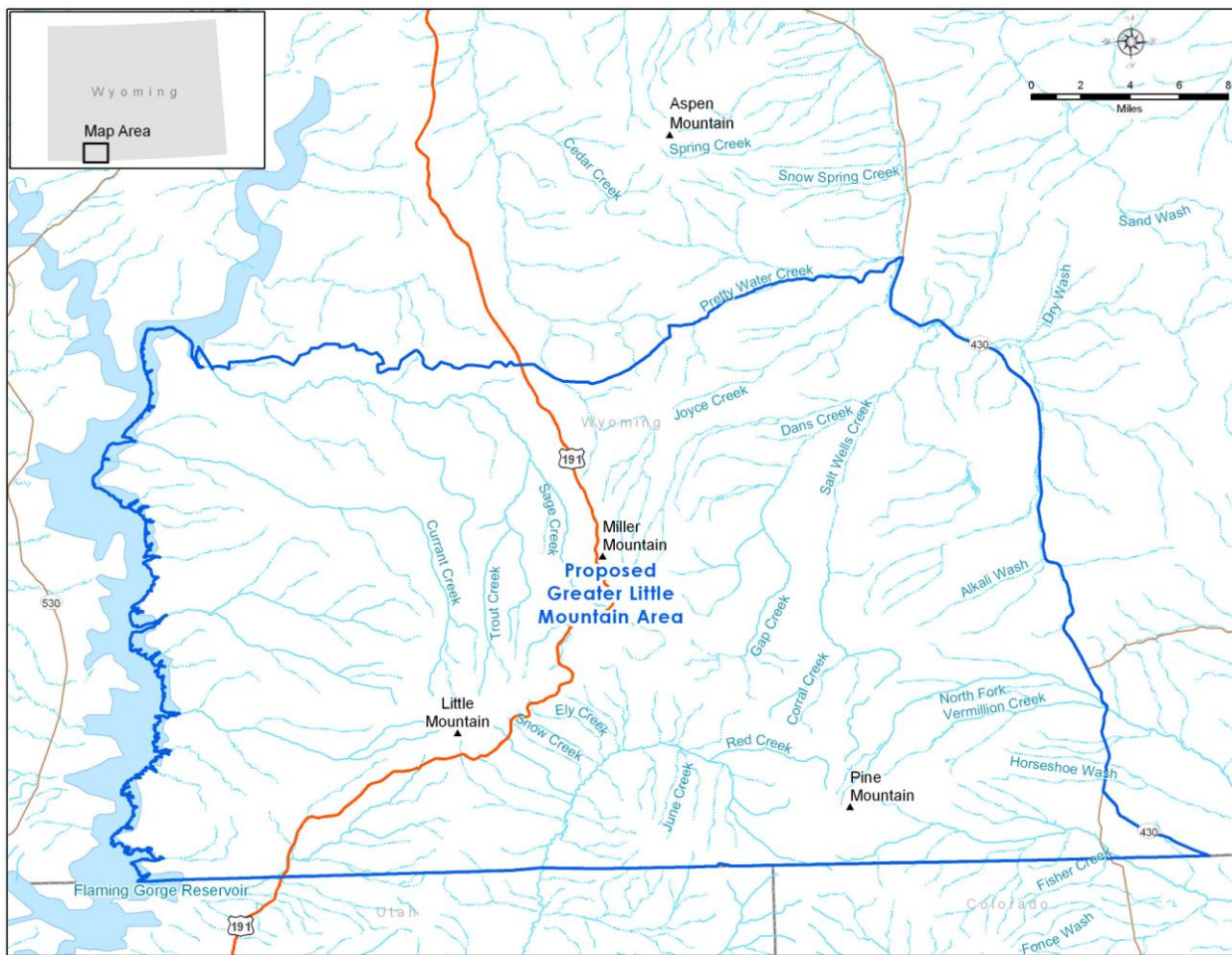
For the last three years, the Greater Little Mountain Coalition has worked with state and federal agencies, local citizens, ranchers, businesses, and other non-profits to conserve the natural and sporting heritage that makes up Wyoming's unique Little Mountain area. The Coalition supports multiple use management and seeks to find balanced solutions that ensure the areas great hunting and fishing is preserved for future generations. Our principal area of focus is energy development in the Greater Little Mountain Area. Our scoping comments seek to raise issues and provide options for how responsible energy development can occur while maintaining fish and wildlife habitat. Additionally, the Coalition seeks to protect traditional land uses, such as livestock grazing, hunting and fishing.

Members of our Coalition have also engaged in the Little Mountain Task Group meetings, at the

request of former Governor Freudenthal. We are very supportive of efforts that engage multiple stakeholder groups and would like to continue working collaboratively with the BLM and other stakeholders throughout the RMP revision process.

### **Greater Little Mountain Area**

The Greater Little Mountain Coalition defines the Greater Little Mountain Area as east of Flaming Gorge Reservoir, west of Highway 430, north of the Wyoming border and south of Pretty Water Creek and the Sage Creek Road (see map A). This area totals 522,236 acres. As a point of mention, the Coalition’s boundary does include a small portion of checkerboard as it is within the Sage Creek Area of Critical Environmental Concern. However, the Coalition is not interested in delivering management suggestions within the checkerboard of private and public land.



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

### **Importance of the GLMA**

For generations the Greater Little Mountain Area (GLMA) has served as a hunting, fishing and recreational paradise for Wyoming sportsmen. For serious hunters drawing a deer or elk tag in the GLMA is a once in a lifetime opportunity to hunt some of the best populations of trophy mule deer and elk in Wyoming. The GLMA contains antelope, mule deer and elk crucial range

along with big game migration corridors for all of those species. “Crucial habitats have the highest biological values, which should be protected and managed to maintain healthy, viable populations of terrestrial and aquatic wildlife.” (Wyoming Game and Fish Department (WGFD) Strategic Habitat Plan, 2009) Thus, these habitats and features are essential to big game population survival. The WGFD recommends no loss in habitat function to ensure these habitats retain their capability to sustain populations, species or diversity over time.

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

The GLMA is also home to 37 terrestrial species identified as SGCN by the WGFD. (WGFD, 2005, A Comprehensive Wildlife Conservation Strategy for Wyoming, Cheyenne, WY). Specifically the area contains sensitive populations of Midget Faded rattle snake, which is extremely rare and found only in the Flaming Gorge region, as wells the Pygmy rabbit, whose limited range includes sagebrush habitat in the GLMA. Overall, the region possesses large intact tracts of prime fish and wildlife habitat that is valuable in its own right and translates directly into opportunity for hunters and anglers.

Recognizing the importance of this area, from 1990 about \$3 million has been spent on habitat improvement. A majority of those funds came from the BLM, with the remainder coming from the WGFD, Grazing Board and Permittees, Bureau of Reclamation and Sportsmen’s Groups. Over the last two decades, improvements such as watershed enhancements (particularly within the Currant Creek watershed), fencing, burns, tree planting, and wildlife habitat recovery have been conducted throughout this unique ecosystem. These efforts have lead to significant improvements such as increasing wildlife productivity and landscape health. Given the significant investment in this area it is important to make future management decisions that further the good work that has been done and that we do not engage in actions that result in a backslide of current and past efforts.

### **Management for the GLMA**

The Coalition is especially concerned with the fate of big game, Greater sage grouse, Colorado River Cutthroat trout and the recreation opportunities they provide thousands of sportsmen and women in southern Wyoming. Without comprehensive habitat management planning, closely coordinated with the Wyoming Game and Fish Department, leasing and development of energy resources within critical fish and wildlife habitat can have a devastating impact on those wildlife resources and hunting opportunities they afford. The status quo for managing energy

development within the GLMA has been to analyze that development on a project-by-project basis and not analyze how each project can impact the other or how they cumulatively impact the other multiple uses. Comprehensive analysis that incorporates current resource science and management scenarios, along with a landscape scale look at this special area is needed when revising the RS RMP. Specifically, we think the following actions should be reviewed and considered when developing draft alternatives for the RMP.

1. The Red Creek ACEC (Area of Critical Environmental Concern) portion of the Greater Red Creek ACEC and the Red Creek Wilderness Study Area (WSA) will remain off limits for energy leasing and development.
2. The Currant Creek ACEC of the Greater Red Creek ACEC remains No Surface Occupancy (NSO).
3. No new leasing of contiguous blocks of land, identified in December 1, 2009 letter from BLM to Governor Freudenthal, that fall within the Currant Creek ACEC and Sage Creek ACEC. Allow for retirement of expiring leases that are adjacent to these contiguous blocks.
4. All perennial streams containing CRCT or with the potential for CRCT introduction shall have a 1/2mile NSO buffer.
5. No new leasing of areas that have multiple species overlap of critical big game habitat.
6. Standard timing stipulations for all wildlife should be mandatory for energy development. Exceptions granted for wildlife stipulations should only be granted in extreme circumstance.
7. The Best Management Practices as outlined in the BLMs “Gold Book” should be mandatory requirements for energy development.
8. The regions of Miller Mountain, Potter Mountain, Elk Butte, and the Salt Wells Creek drainage above Titsworth Gap should be reviewed for increased protections, due to crucial wildlife ranges, steep slopes, and high recreational hunting values for elk and mule deer.
9. A review of cumulative impacts in the GLMA from wind development rights of way, mineral leases, and pipeline proposals should take place before further leasing and permitting continues to best protect traditional land uses.
10. A review of all existing roads and well pads in the GLMA should be completed to consider use of existing infrastructure when developing leases.
11. Noxious weeds and invasive plant species can have a substantial negative impact on native vegetation and associated wildlife habitat. There should be specific measures developed to minimize the introduction and dispersal of these plants.
12. Much of the GLMA is within Wyoming’s Greater sage grouse core population area. When developing management protocols, use the State of Wyoming’s Executive Order 2010-4 for guidance and inclusion within the RS RMP.
13. Avoid impacts to crucial winter habitat, migration corridors, and sensitive riparian habitat.
14. When avoidance isn’t possible, mitigation thresholds should be decided upon upfront and solutions determined.
15. Before development of any kind is allowed, baseline information for terrestrial and aquatic species is needed. Vegetation data would also prove beneficial to have before any development ensues.

## **Conclusion**

We appreciate this opportunity to offer our comments on the BLM’s Rock Springs Field Office RMP Revision. We hope that these are constructive for the Planning Team as draft alternatives

are developed. If the Planning Team has any questions or would like to discuss these comments with the Greater Little Mountain Coalition please contact us using the information provided below.

Sincerely,

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