

WYOMING GAME AND FISH DEPARTMENT

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February 12, 2016

WER 7007.01i
Bureau of Land Management
Rock Springs Field Office
Rock Springs Resource Management Plan Revision

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

Dear Ms. Foster:

The Wyoming Game and Fish Department (Department) is submitting the following proposal to be considered as an alternative in the Rock Springs Resource Management Plan revision. During the development of this proposal, the Department has consulted with the Governor's Policy Office, Sweetwater County Commissioners, Sublette County Commissioners, the Coalition of Local Governments, Wyoming Stock Growers Association, Rock Springs Grazing Association, Little Sandy Grazing Association, Anadarko, several landowners and grazing permittees, the Greater Little Mountain Coalition and several non-governmental organizations.

In general, the Department used the following criteria in the development of recommendations:

- Consideration of large areas of continuous BLM surface ownership;
- Consideration of extremely important terrestrial wildlife and/or aquatic habitat, often with overlapping wildlife values for multiple species; and
- Consideration of valuable recreational areas for hunting and fishing.

If this proposal is incorporated into an alternative, we recognize that all existing leases are valid and are expected to be permitted per the existing lease stipulations. All timing stipulations (TLS) and controlled surface use (CSU) stipulations are valid on all existing leases. Any additional CSU stipulations would only apply to new leases after the revised Resource Management Plan (RMP) Record of Decision (ROD) is signed.

The Department's recommendation for additional CSUs, including no surface occupancy (NSO) applies to surface-disturbing activities associated with energy and wind development projects. The recommended CSUs would not preclude pipeline installations, habitat enhancement projects,

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recreation, hunting and fishing, wild fire suppression, and any type of activities associated with livestock grazing. NSO designation does not prevent the construction of projects within an RMP approved utility corridor.

It is the Department's understanding that within areas designated NSOs, the BLM can lease the area for oil and gas development and allow geophysical exploration. Big game timing stipulations will be maintained within the NSOs for all activities that are currently permitted under the existing RMP. In addition, a NSO can be removed with a RMP amendment.

As a general comment pertaining to any alternative in the RMP revision, the Department requests an opportunity to discuss changes to the interim reclamation standards.

We respectively request that a cooperators meeting be scheduled so that this proposal can be discussed.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Rick Huber, Staff Aquatic Biologist, at 307-777-4558.

Sincerely,

John Kennedy Deputy Director

John Unnudy

JK/mf/ns

cc:

William West, Rock Springs BLM, Planning and Environmental Coordinator Mark Snyder, Rock Springs BLM, Supervisory Wildlife Biologist Gavin Lovell, Rock Springs BLM, Assistant Field Manager-Resources Patrick Lionberger, BLM, Wildlife Biologist

Larry Claypool, BLM, Acting Associate State Director

Scott Smith, WGFD, Cheyenne

Jerimiah Rieman, Governor's Policy Office

Susan Child, OSLI, Deputy Director

Sweetwater County Commissioners

Mark Kot, Public Lands Planner, Sweetwater County

Sublette County Commissioners

Fremont County Commissioners

Don Schram, Rock Springs Grazing Association

Joy Bannon, Wyoming Wildlife Federation

Julia Stuble, Wyoming Outdoor Council

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Dan Smitherman, The Wilderness Society
Jim Magagna, Wyoming Stock Growers Association
Pete Arambel, Arambel Ranches
John Erramouspo, G&E Livestock, Inc.
John Hay, Rock Springs Grazing Association
Gary Zakotnik, G Z Livestock
Lincoln County Commissioners
Cathy Purves, Trout Unlimited
Ester Wagner, Petroleum Association of Wyoming
Nick Owens, Anadarko

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PROPOSAL TOTALS (Map 1)

Big Game Crucial Winter Range: No Stipulations	703,382 acres
Proposed NSO:	232,375 acres
Big Game Crucial Winter Range Stipulations Maintained:	403,262 acres
Approved Mitigation Plan CSU:	537,403 acres
Big Game Crucial Winter Range Timing Stipulations Maintained And Approved Mitigation Plan CSU:	54,872 acres
1/2 Mile Stream Buffer Semi-Closed Loop Drilling CSU, Outside Sage Grouse Core:	28.587acres

Map 1. Rock Springs RMP Proposal Legend Existing RMP No Lease/NSO Areas Historic Trail Proposed Mule Deer Migration Corridor Mitigation Plan CSU Cedar Nountain Master Development Plan Area Mule Deer Timing Stips Maintained & Mitigation Plan CSU BGCWR Timing Stipulations Maintained Cedar Mountain Management Area BGCWR Timing Stipulations Removed Golden Triangle Management Area 1/2 Mile Stream Buffer Sem i-Closed Loop Drilling CSU

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PROPOSALS

Big Game Crucial Winter Range: No Timing Stipulations (Map 2)	703,382 acres
Greater Little Mountain Complex (Map 3) Proposed NSO: BGCWR Timing Stipulations Maintained:	219,175 acres 6,980 acres
Sublette County including Golden Triangle Management Area (Map 4) Golden Triangle Management Area: Approved Mitigation Plan CSU within the Golden Triangle: Approved Mitigation Plan CSU within the Proposed Mule Deer	289,308 acres 179,246 acres
Migration Corridor:	110,062 acres
BGCWR Timing Stipulations Maintained: MDCWR Outside Golden Triangle Maintain Timing Stipulations and	284,825 acres
Approved Mitigation Plan CSU:	31,181 acres
Mule Deer Management Area (Map 5)	221,269 acres
Approved Mitigation Plan CSU: Mule Deer Crucial Winter Range Proposed NSO: MDCWR Timing Stipulations Maintained &	191,433 acres 6,145 acres
Approved Mitigation Plan CSU:	23,691 acres
Midget Faded Rattlesnake & N. Tree Lizard (Map 6) Proposed NSO:	7,055 acres
Stream Buffer (Map 7) ½ mile: semi-closed loop drilling CSU Outside SG Core:	28,587 acres
Cedar Mountain Management Area (Map 8) BGCRW Timing Stipulations Maintained: Cedar Mountain Development Plan Area: Approved Mitigation Plan CSU:	283,192 acres 111,457 acres 56,662 acres 56,662 acres

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Big Game Crucial Winter Range with Timing Stipulations Removed

The Department's proposal will remove big game crucial winter range stipulations on 703,382 acres that occurs within the Rock Springs Field office (Map 2). However, the RMP will still recognize these areas as big game crucial winter range.

Other timing stipulations such as sage grouse, raptors, BLM sensitive species may need to be applied.

Big Game Crucial Winter Range:

No Timing Stipulations but Occur within SG Core (Map 2a) 431,316 acres

Big Game Crucial Winter Range:

No Timing Stipulations but Outside SG Core (Map 2b) 272, 066 acres

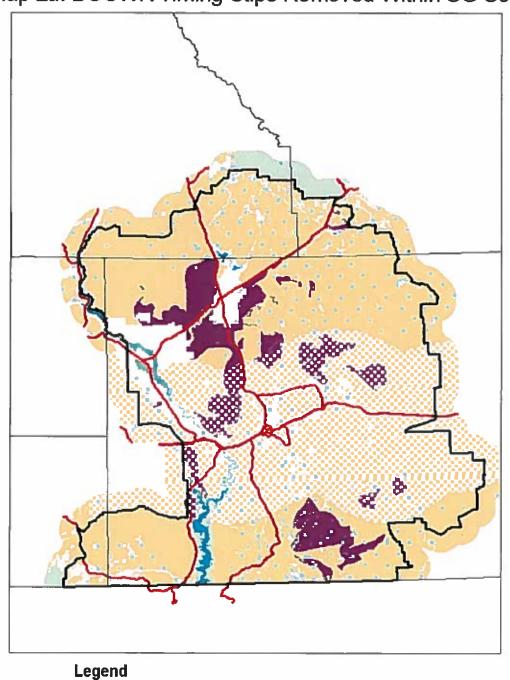
Map2. BGCWR Timing Stipulations Removed

Legend

----- Highways

Big Game Crucial Winter Range Timing Stipulations Removed

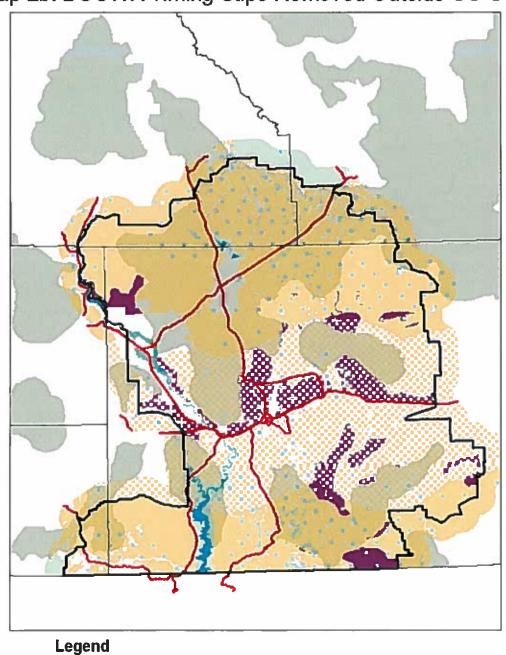
Map 2a. BGCWR Timing Stips Removed Within SG Core



Highways

Big Game Crucial Winter Range No Timing Stipulations WITHIN SG Core

Map 2b. BGCWR Timing Stips Removed Outside SG Core



egena — Highways

Sage Grouse Core v4

Big Game Crucial Winter Range No Timing Stipulations OUTSIDE SG Core

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Greater Little Mountain Complex

Current RMP Management:

Red Creek ACEC: Unavailable to O& G Development & ROW Exclusion: 67,775 acres
Currant Creek ACEC: Unavailable to O& G Development & ROW Exclusion: 30,220 acres

Proposed NSO: 219,175 acres

Maintain Big Game Crucial Winter Range Timing Stipulations: 6,980 acres

The Little Mountain Ecosystem is the "Crown-Jewel" of Sweetwater County. The majority of the local residents are deeply passionate for the outstanding wildlife resources and aesthetic values the ecosystem has to offer.

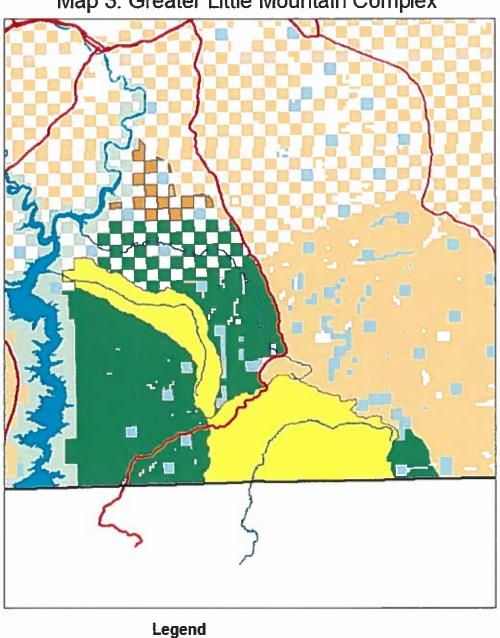
Gooseberry Creek, Currant Creek, Sage Creek, Trout Creek, Red Creek, and Little Red Creek are inhabited by Colorado River cutthroat trout.

The Department has partnered with the BLM, private landowners, and local and national conservation groups in the ongoing Little Mountain/Red Creek Watershed Enhancement Project over the past 24 years in comprehensive landscape restoration effort to improve the health and integrity of the Little Mountain ecosystem. An integrated watershed management approach, based on natural vegetative succession concepts, was adopted for habitat improvements planned and implemented in the landscape surrounding Little Mountain. Enhancement strategies are centered on the concept that healthy riparian areas are a product of sound upland habitat, and together function as a basin-wide ecosystem. A coordinated effort to manage the Little Mountain ecosystem for the conservation and enhancement of the basic soil, water, and vegetation resources has and will continue to improve habitat for all terrestrial and aquatic wildlife species using the area.

This is an extremely popular area for recreation, hunting, angling, wildlife viewing, and other outdoor experiences. Demand for big game permits in this area are extremely high, and drawing odds for both South Rock Springs deer (HA 102) and South Rock Springs elk permits (HAs 30, 31, and 32) are among the lowest in the state, further highlighting this area's popularity. Some of the Governor's Special Big Game Licenses are used in this area on an annual basis. The area is known for producing older-aged trophy quality bulls and bucks, and there is intense local, state, and national interest in maintaining conditions that support these populations in their present state.

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Flaming Gorge Reservoir supports an annual 10+ million-dollar recreational sport fishery. The reservoir supports a highly popular trophy lake trout and kokanee salmon fishery, which is considered to be one of the best in the western United States. Tributary streams entering the reservoir warrant protection from those from land use activities that accelerate heavy sediment and phosphorus loading causing euthrophic aquatic conditions, rapid sediment deposition that buries or degrades important underwater structural habitat features, and large scaled industrial chemical or petroleum spills that could negatively affect water quality and the fisheries in Flaming Gorge Reservoir.



Map 3. Greater Little Mountain Complex



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Sublette County including Golden Triangle Management Area

Current RMP Management:

Wind River Front SRMA Eastern Portion: Unavailable to O&G Leasing and	
ROW Exclusion:	86,384 acres
Golden Triangle Management Area:	289,308 acres
	•
Approved Mitigation Plan CSU within the Golden Triangle:	179,246 acres
Approved Mitigation Plan CSU within the Proposed Mule Deer	
Migration Corridor (see Map 5):	110,062 acres
BGCWR Timing Stipulations Maintained:	284,825 acres
MDCWR Outside Golden Triangle Maintain Timing Stipulations and	
Approved Mitigation Plan CSU:	31,181 acres

This area represents one of the largest "mostly intact" sagebrush steppe ecosystems west of the Continental Divide in Wyoming.

This area has the highest percentage of stopover areas for the Red Desert to Hoback mule deer migration corridor. This area provides of the greatest diversity of big game crucial habitat for antelope, mule deer, elk, and moose and numbers of wintering animals than any other large geographic area within the Rock Springs Field Office.

Extremely Important Watersheds that has Flannelmouth Sucker (FMS), Bluehead Sucker (BHS), and Roundtail Chub (RTC). Big Sandy River: FMS, BHS, & RTC, Sculpin Creek: FMS & BHS, and Little Sandy River: FMS & BHS.

A number of sagebrush obligates species inhabit this area seasonally or year-round and represents some of the largest populations remaining within Wyoming.

Map 4. Sublette Cty Including Golden Triangle Mngt Area

Legend



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Mule Deer Management Area (Map 5)

Mule Deer Management Area:

Proposed Mule Deer Migration Corridor Approved Mitigation Plan CSU:

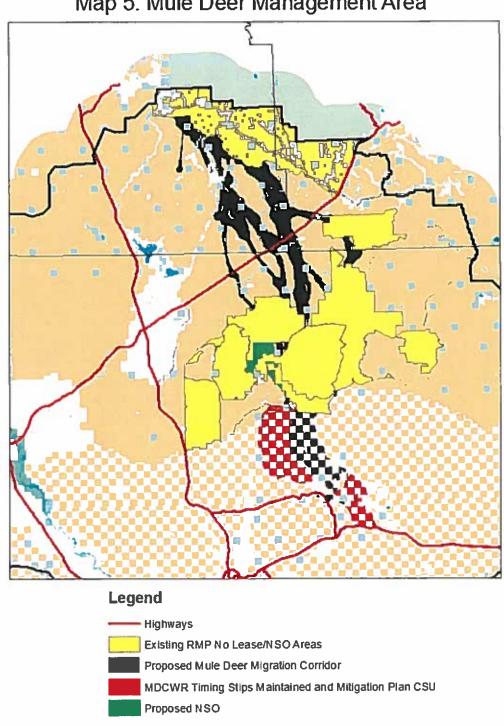
Mule Deer Crucial Winter Range Proposed NSO:

MDCWR Timing Stipulations Maintained & Approved Mitigation Plan CSU:

221,269 acres
191,433 acres
6,145 acres
23,691 acres

Mule deer from as far away as the upper Hoback River, the upper Snake River, and Granite Creek migrate annually to and from this area to winter on crucial winter range. This represents the longest documented ungulate migration in the lower 48 states. Development of these habitats could impede deer movements in a vital migration corridor.

Extremely Important Watershed for the flannelmouth sucker (Bitter Creek).



Map 5. Mule Deer Management Area

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Midget Faded Rattlesnake & Northern Tree Lizard Proposed NSO

Proposed NSO: 7,055 acres

The areas around Flaming Gorge Reservoir provide the only known habitat for midget faded rattlesnakes and northern tree lizards in Wyoming. Both the midget faded rattlesnake and the northern tree lizard are listed as Species of Greatest Conservation Need and ranked as Native Species Status 1 (highest ranking) Wyoming. This area contains 7 known den sites for midget faded rattlesnakes, with 7 additional known den sites just outside this area. The protection of these den sites and associated habitat for these two species will decrease the chance of a future ESA petition.

Legend

Map 6. Midget Faded Rattlesnake & N. Tree Lizard

- Highways Proposed NSO Kimberlee Foster February 12, 2016 Page 20 of 23 - WER 7007.01i

CSU Stipulations along the Green River, Blacks Fork River, and Bitter Creek

½ mile semi-closed loop drilling CSU Outside SG Core:

28,587 acres

To protect watersheds that contains flannelmouth sucker, bluehead sucker, and roundtail chub. Additional protections for municipal drinking supplies and the extremely important recreational fisheries in the Green River, Black Fork River, Fontenelle Reservoir and Flaming Gorge Reservoir.

Legend

1/2 Mile Semi-Closed Loop Drilling CSU Buffer

Map 7. Stream Buffer CSU

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Cedar Mountain Management Area

Existing RMP Management:

Twin Buttes & Devils Playground WSA:24,066 acresPine Springs ACEC outside WSAs:1,005 acresCherokee Trail:7,322 acres

Proposed Management Area: 283,192 acres
Big Game Crucial Winter Range Timing Stipulations maintained: 111,457 acres

Proposed Master Development Plan Area:

56,662 acres

Master Development Plan will be developed to minimize impacts to high value habitats. Additionally an approved mitigation plan CSU will be applied within the master development plan area. The Master development plan may allow year round drilling on big game crucial winter range in certain areas, if other areas are protected.

This area is adjacent to high level of development (Moxa Arch) and represents the best of what remains in this area for wintering wildlife. Meeting wildlife goals in this area relies upon maintaining blocks of areas with limited development and surface disturbance.

This area has big game crucial winter range for mule deer, moose, and antelope. The Uinta mule deer and pronghorn herd units are popular with sportsmen and provide a large number of recreation days annually, therefore has a high value for recreation and hunting opportunities.

Important headwater streams that flow into the Henry's Fork River which contain Colorado River cutthroat trout, bluehead sucker, and flannelmouth sucker.

10 Legend county_new Highways Historic Trail Existing RMP No Lease/NSO Areas Master Development Plan Area **BGCWR Timing Stipulations Maintained** Cedar Mountain Managment Area

Map 8. Cedar Mountain Management Area