

APPENDIX A

SUMMARY OF PUBLIC SCOPING COMMENTS

Appendix A provides a summary of scoping comments organized by revision topics. The comments in this appendix are not necessarily exact copies from the comment letters and forms, they are summaries of comments. Copies of the original comment letters and forms can be found in Appendix B. To ensure that all comments are addressed during alternative formulation, some comments are listed under multiple revision topics.

Air Quality

Letter #	Author	Comment
CSL-0013	State of Wyoming, Department of Environmental Quality	The RMP revision should address impacts of smoke from prescribed fire on public health, nuisance and visibility.
		The RMP should recognize State primacy for air quality under the Clean Air Act.
		Review air quality regulations relative to management actions.
CSL-0045	Wyoming Farm Bureau Federation	The RMP should encourage the BLM and State of Wyoming to work together on air quality issues.
		The RMP should recommend the use of prescribed fire, if a wildfire would produce larger impact to air quality.

Cultural Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Bureau of Land Management (BLM) should consult with the tribes indigenous to the Casper Planning Area
CSL-0002	Anadarko Petroleum Corp.	The existing Resource Management Plan (RMP) decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
CSL-0003	National Trust for Historic Preservation	Take greater responsibility for evaluating and protecting cultural resources.
		Survey land for cultural resources that have not been previously identified or evaluated.
		Develop proactive measures to protect cultural resources from mineral development.
		Incorporate specific cultural management plans into alternative development.
		Outline cultural issues and potential areas of interest at outset of RMP process.
		Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
		Integrate Section 110 of the National Historic Preservation Act (NHPA) into the RMP process by identifying, evaluating, and nominating properties to the National Register.
		Adopt specific measures to protect cultural resources from artifact collectors, looters, and vandals.
		Ensure that allowed uses within the area will not diminish BLM's ability to identify and protect historic properties in the future.
		Nominate the Cedar Ridge-Badwater Creek area to the National Register of Historic Places as a Traditional Cultural Property.

Cultural Resources (continued)

Letter #	Author	Comment
CSL-0003 (continued)	National Trust for Historic Preservation	Manage the Cedar Ridge-Badwater Creek area as a Special Management Area to ensure adequate protection.
		Adopt “No Surface Occupancy” restrictions and additional necessary stipulations for Leases, in order to avoid and minimize potential adverse effects on cultural and historic properties.
		Identify all threats to cultural resources and the natural condition of public lands (including off-road vehicle (ORV) and other recreational activities).
		Follow mandates in BLM’s Cultural Resource Management Plan (CRMP) manual.
		Establish as a goal the protection, conservation, and, where appropriate, restoration, of archeological and historic sites and landscapes in the Casper field area.
		Determine the sites or areas that are most vulnerable to current and future adverse impacts and adopt management actions necessary to protect, conserve, and restore cultural resources.
		Outline specific management actions, such as stabilization, fencing, signage, closures, or interpretative development, to protect, conserve and, where appropriate, restore cultural resources.
		BLM should comply with Section 106 of the NHPA prior to designating areas for ORV use.
		Restrict activities by applying No Surface Occupancy (NSO) restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0007	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	Special attention should be given to the protection—particularly viewshed protection—of historically important transportation corridors (e.g., trails, roads, railroads) and the Cedar Ridge Native American Traditional Cultural Property (TCP).
		Provide an in-depth overview and situational analysis of BLM-managed cultural resources in the Casper Planning Area.
CSL-0030	Joe D. Reddick	Protect historic Fort Fetterman and Little Medicine (Box Elder) Roads while allowing today’s uses.
		Protect pristine “ruts”/station sites of historic trails.
		Encourage public use of historic trails by marking routes.
		Encourage historical re-enactment.
CSL-0031	G. Eugene Hardy	It is a mistake to make the public aware of items or sites of interest (archeological/historic/cultural/etc.).

Fire Management

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should institute a big sagebrush natural fire policy in place of controlled burns.
CSL-0011	Wyoming Game and Fish Department	Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (Wyoming Game and Fish Department [WGFD] and Wyoming BLM 2002).
		Address past and future uses of fire and its proper implementation for specific purposes, as well as post-treatment management and monitoring.
CSL-0013	State of Wyoming, Department of Environmental Quality	Address impacts from using fire as a management tool.
		Identify where and under what conditions to use fire as a management tool including the identification of areas to be managed as full suppression, limited suppression and no suppression with regard to wildland fire management.
		Address impacts from fire (smoke, public health, etc.).
CSL-0025	Clyce McCulloch	Prescribe burn a larger area at a time.
CSL-0029	Facilitator Notes	BLM needs to react to prescriptions when window is offered.
		Address prescriptions in mahogany on a landscape base.
CSL-0039	Kenneth Small	Proceed with more prescribed burning.
CSL-0043	Robert, Rita and Jock Campbell	Prescribed fires as a management tool in our area would be questionable due to the risk of establishment or expansion of invasive non-native plant species.
CSL-0044	WGFD	Address pre-treatment and post-treatment (prescribed fire) management, which includes rest to build fuels prior to treatment and rest following treatment to facilitate vegetative recovery.
		Aspen should be specifically included as a resource that will benefit from the use of fire, and fire should be actively reintroduced back into the aspen community.
		Burned areas offer an excellent opportunity for establishment or expansion of non-native plant species. We recommend incorporating a provision into the fire program that will allow for the use of chemicals to prevent, reduce, and/or control the potential that exists for establishment and/or expansion of weed species. This provision should be programmatic in planning processes, including post-management activities following a wildland fire.
CSL-0045	Wyoming Farm Bureau Federation	Efforts to enhance range conditions by prescribed fires should be utilized as much as possible and the Agency needs to examine its prescribed fire protocols to ensure they don't serve as an impediment to fire use.

Fish and Wildlife

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should require adequate protection for sage grouse. The absolute minimum measure that should be emplaced is a NSO (and no vegetation treatments) within 2 miles of a sage grouse lek.
		The Casper RMP revision should require adequate protection for prairie dogs. Require NSO stipulations for all prairie dog colonies with a ½ mile buffer.
		The BLM should designate all Prairie Dog complexes larger than 3,000 acres as areas of critical environmental concern with additional protections such as moratorium on recreational shooting.
		The Casper RMP revision should adequately protect big game crucial ranges. Require NSO stipulations to be placed on all big game crucial ranges (crucial winter, winter yearlong, severe winter relief and calving ranges) with no opportunity for waiver.
		The Casper RMP revision should adequately protect raptor nesting habitat.
		Nesting mountain plover areas that are identified should be protected with NSO stipulations, with a minimum ½ mile NSO buffer.
		The Casper RMP revision should protect populations of rare native warmwater fishes.
		The Casper RMP revision should mandate directional drilling to reduce wildlife habitat impacts.
		The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
		The Casper RMP revision should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.
CSL-0002	Anadarko Petroleum Corp.	Discussion of potential stipulations regarding non-Endangered Species Act (ESA) species should recognize BLM's lack of authority to enforce the stipulations or studies on private property.
CSL-0004	WGFD	Incorporate Swift Fox conservation measures into RMP.
		Analyze the Swift Fox in the environmental impact statement (EIS).
		Include Swift Fox on BLM state list of sensitive species.
CSL-0005	Wyoming Department of Agriculture	Consider impacts to resources from wildlife and horses.
CSL-0011	WGFD	Evaluate action items from the 1985 RMP to help determine continuing issues and concerns for the new RMP.

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Review fence modifications to improve pronghorn movements and development of permanent water sites for pronghorn in 1985 plan.
		Review water development for mule deer from 1985 plan.
		Review status of wildlife management covered under the remaining segments of the Planning Decisions section in 1985 plan.
		Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan.
		Address declining shrub (mahogany and sagebrush) habitat conditions for wildlife.
		The RMP should consider the sensitivity ratings of various non-game fish in habitat management.
		Address impacts of the drought on wildlife habitat.
		Evaluate the impacts of OHV use on wildlife habitat and wildlife use of the habitat.
		Address the foreseeable level of oil and gas development and the probable impacts it has on wildlife and habitat.
		Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
		Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002).
		Encourage localized conservation efforts, such as the Bates Hole sage grouse conservation working group.
		Maintain and improve key wildlife habitats.
		Maintain and improve sagebrush important for maintaining wildlife habitats.
		Continuation of existing Habitat Management Plans (HMP) and formulation of necessary additional HMPs.
		Designate special management areas for key wildlife habitats.
		Implement seasonal stipulations to protect key wildlife habitats during important seasons of use.
		Address past and future uses of fire and its proper implementation for specific purposes, as well as post-treatment management and monitoring on habitat.
		Adequate habitat for sensitive species and prevention of future listings of these species. Reference WGFD plan for high priority nongame species for habitat management in key areas.

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
		The ability to implement habitat improvements on existing allotments. These actions could happen easier by temporarily relocating livestock on vacant allotments while the regular allotment is being treated.
		Address the effects of roads on wildlife and habitat loss and fragmentation, particularly in areas of intensive energy development.
		The lack of specific allotment planning is a concern particularly in key wildlife habitat areas.
		Address waterfowl nesting cover at Goldeneye Reservoir.
		Address the ability to move animals into or out of specific areas for the purposes of managing or re-establishing fish and wildlife populations.
		The ability to maintain and, where needed, improve crucial winter ranges is a concern. Assure that adequate forage is available to wildlife during the necessary seasons of use.
		Manage forest cover habitat to maintain and enhance habitat and thus wildlife diversity.
		Support the creation of new reservoirs that provide sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area. Would like to coordinate with BLM to develop Recreation Management Area Management Plan for the 33-mile area.
		Address protection of springs and seeps. Suggest protecting springs and seeps through fencing and adjacent water development.
Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.		
CSL-0030	Joe D. Reddick	Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
CSL-0033	Archie Bruner	Address domestic agriculture as a benefit to natural land uses.
CSL-044	WGFD	WGFD recommends the BLM maintain and/or improve the following HMPs: Bolton Creek, Ferris-Seminole, Grayrocks Reservoir, Laramie Peak Bighorn Sheep, Rawhide Wildlife Area, Springer/Bump-Sullivan Wildlife, Table Mountain Wildlife, and Goldeneye.

Fish and Wildlife (continued)

Letter #	Author	Comment
<p>CSL-044 (continued)</p>	<p>WGFD</p>	<p>WGFD recommends four additional 1-acre exclosures within the Table Mountain Wildlife Area, and proportionately manage livestock grazing animal unit months (AUM) to account for the existing and additional exclosures.</p>
		<p>WGFD recommends a Bates Hole HMP, which would incorporate the existing Bates Creek Aquatic HMP and Bates Creek Reservoir HMP.</p>
		<p>WGFD recommends a 33-mile HMP, which would incorporate the existing 33-Mile Reservoir HMP, Railroad Grade Reservoir, Bishop Waterfowl HMP, Camel Hump Reservoir Wildlife and Recreation Area, and Teal Marsh Reservoir.</p>
		<p>WGFD recommends the BLM evaluate the progress of HMP goals and objectives, on an annual basis, and provide a status report to those agencies with Cooperating Agency Status.</p>
		<p>WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.</p>
		<p>BLM take aquatic management issues and concerns into consideration when addressing riparian area management, road development and management, watershed health, etc.</p>
		<p>WGFD recommends the BLM allocate forage resources for wildlife in order to sustain WGFD big game population objectives and other wildlife populations.</p>
		<p>The BLM work collaboratively with WGFD in developing, funding and utilizing remote sensing (landscape level landcover classifications) as a basis for landscape level inventory, establishing wildlife habitat monitoring areas based upon inventories, and sharing previously collected wildlife habitat monitoring data.</p>
		<p>The BLM should review the status of lands withdrawn for stock driveway use, and consider creating grassbanks if the area of land would be large enough to facilitate grassbank activities. WGFD recommends that salt and mineral locations within each grazing allotment be placed a minimum of ½ mile away from any water source and/or riparian area.</p>
<p>CSL-0045</p>	<p>Wyoming Farm Bureau Federation</p>	<p>Too much emphasis has been given to wildlife management and more of a balance should occur in those areas where there are wildlife and livestock issues.</p>

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0045 (continued)	Wyoming Farm Bureau Federation	The lack of information relative to habitat needs of Threatened, Endangered, Candidate, and Sensitive species have lead the Agency to restrict other economic uses on federal lands in order to “be safe” even if the Agency is unsure. The Agency should be more aggressive in defending the multiple use mandate where habitat needs for listed or candidate and sensitive species is incomplete or lacking.

Lands and Realty

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should forbid industrial development on floodplains.
CSL-0009	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Encourage a balanced approach to the use of the area’s resources with minimal regulation when appropriate.
		Maintain access to state lands for mineral development.
CSL-0011	WGFD	Include and promote actions such as conservation easements and land exchanges to facilitate land management and public access.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
		Do not include lands within the boundaries of or adjoining Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) as lands targeted for disposal or mineral leasing.
		Do not dispose of federal land regardless of size which has legal access particularly BLM land adjacent to Glendo, Gurnsey, and Grayrocks reservoirs.
		The RMP should mitigate for development.
		WGFD recommends that the SW ¼ section of section 31, T34, R76 not be considered for disposal since it connects four state sections of river in an area that supports a trout fishery of 500 fish per mile greater than 6 inches and an uninterrupted riparian corridor for wildlife. Similarly, BLM properties in section 1, T24, R63, section 30, T25, R62, and section 25, T25, R63 are contiguous with the Rawhide Wildlife Habitat Management Area and WGFD asks that they not be disposed.
CSL-0014	Florenc Williamson	Manage for preservation of public lands (no development).
CSL-0015	Mahlon and Joan Frankhauser	Preserve public lands and scenic beauty.

Lands and Realty (continued)

Letter #	Author	Comment
CSL-0028	Tom Preuit	If land comes up for sale, he wants to have the first right of refusal.
CSL-0029	Facilitator Notes	Need land tenure adjustment for small isolated tracts.
		Need access across private land to reach public lands.
CSL-0030	Joe D. Reddick	Sell the lots in the Esterbrook townsite.
		Sell scattered isolated tracts of public lands because ineffective to manage.
		Only gravel all weather roads.
		Identify areas for land exchange.
CSL-0031	G. Eugene Hardy	Dispose of scattered parcels of BLM lands.
		No more land acquisition by BLM.
		Multiple uses of BLM lands must be maintained.
CSL-0033	Archie Bruner	Address resource conservation.
		Aggressive industry and human interference distract from the natural resources of the land.
		The fundamentals of nature should be the foundation of land use and economic development to protect air, water, soil, and future life.
CSL-0035	Natrona County Development Department	Natrona County would like to incorporate findings of the RMP into Natrona County land use planning documents.
CSL-0039	Kenneth Small	Possible land transfer. Our lease included a 40-acre parcel in the NE ¼, SE ¼ of sec 25, R70, 722. We would be interested in either purchasing this parcel or trading it to the BLM for a same sized tract that would be adjacent.
CSL-0044	WGFD	WGFD recommends the BLM not dispose of any public lands within and/or adjacent to Wyoming Game and Fish Commission Wildlife Habitat Management Areas, lands adjacent to the North Platte River, lands that are currently accessible to recreationists (i.e., hunters, anglers, etc.), and lands that facilitate access to larger blocks of public lands.
		WGFD requests the BLM target land acquisitions, trades, exchanges, and/or easements that facilitate increased public access to the North Platte River, access to adjacent public lands, grassbank creation, and management of crucial wildlife habitats.
		WGFD recommends the BLM not dispose of public lands where production has occurred simply because they have been developed (i.e., utilities and roads are present).

Lands and Realty (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD requests the public lands within Township 23 - 24 and Range 69 - 70 (Muleshoe Flats) remain intact and not be sold, traded and/or exchanged due to the valuable public access these lands provide for hunting opportunities. These lands should be actively managed for the purpose of maintaining and/or enhancing wildlife habitat and existing wildlife populations.
CSL-0045	Wyoming Farm Bureau Federation	In areas where land ownership can be adjusted, the BLM needs to pursue those options aggressively to address access issues.
		There are several management options which could help mitigate these misunderstandings. In areas where land ownership can be adjusted, the BLM needs to aggressively pursue these options if there is a willingness by the landowner to trade or purchase BLM lands.

Livestock Grazing

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.
CSL-0005	Wyoming Department of Agriculture	Discuss effects of BLM management actions on grazing activities.
		Discuss the economic effect of management actions on agricultural producers and local community.
		Discuss the cumulative impacts to ranchers.
		Work cooperatively with all grazing permittees and agriculture producers.
		Consider impacts to resources from wildlife and horses.
		Work cooperatively with public and interested stakeholders.
CSL-0011	WGFD	The ability to implement habitat improvements on existing allotments. These actions could happen easier by temporarily relocating livestock on vacant allotments while the regular allotment is being treated.
		Riparian area management is a concern and should consider fencing riparian areas to achieve objectives.
		Recommend RMP address grass banks.
		Need to evaluate action items from the 1985 RMP to help determine continuing issues and concerns. These include: Fence modifications; water development; and restoration of streambank cover.
		More water development on public lands to benefit livestock and wildlife.
		Protection of springs and seeps is an issue.

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Support the creation of new reservoirs that provide sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area.
		The RMP should assure that adequate forage is available to wildlife.
		The lack of specific allotment planning is a concern, particularly in key wildlife habitat areas.
		Address the ability to move animals into or out of specific areas for the purposes of managing or re-establishing fish and wildlife populations.
CSL-0023	Facilitator Notes	Reduce stress on range by reducing (managing) antelope herds.
CSL-0027	Bernard R. McGuire, Jr.	Would like management of public lands to remain the same.
CSL-0028	Tom Preuit	Wants his grazing lease to stay the way it is now.
CSL-0030	Joe D. Reddick	Use pasture size as a method to provide diversity of landscape.
		Set an average pasture size standard.
		Remove or limit electric fence use.
CSL-0031	G. Eugene Hardy	Encourage more water developments for livestock and wildlife.
CSL-0032	Jess Rodgers	Convert abandoned oil and gas wells to water wells for livestock and wildlife use.
CSL-0033	Archie Bruner	Address domestic agriculture as a benefit to natural land uses.
		Livestock should be tied to domestic agriculture.
		Wildlife is not the foundation of domestic agriculture.
CSL-0038	Jeanne Leske	Be more diligent in monitoring grazing allotments.
CSL-0041	Randy Shepperson	Grazing lands are set aside for stock trail use. These lands would make great landbanks or wildlife habitat if we did not graze after trail use. This would also leave feed on trail for winter trailing.
		Consider a more incentive oriented BLM Plan, for example members working with the BLM should get faster streamlined improvements.
		Those people in the BLM weed and pest Coordinated Resource Management should have a more understood feeding program so they can buy weed free hay without paying the extra 20 to 30 dollars for certified hay.
		RMP should incorporate incentive based management.
		The BLM is currently fencing out stock trail lands for camping spots. This opens the door for all to pull lands out of trail.
CSL-0043	Robert, Rita and Jock Campbell	The RMP should address access to maintain range improvements.
		Use spring developments to aid in achieving management objectives.

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0044	WGFD	<p>The BLM states that 47 allotments are classified as “I” (Improve Existing Resource Conditions), 65 are classified as “M” (Maintain Existing Resource Conditions, and 416 are classified as “C” (Custodial Management). The number of allotments in the “I” categories is a concern. WGFD recommends implementing management strategies that would improve 15 “I” classified allotments by the year 2010. WGFD also recommends that 20 percent of all grazing allotments have an allotment management plan by the year 2015.</p>
		<p>The BLM states that as of fiscal year 2003, 41 allotments had been evaluated for rangeland health, with 21 of these not meeting one or more of the rangeland health standards. WGFD recommends the RMP include provisions to monitor these specific guidelines, and use the results in active management efforts to improve rangeland conditions.</p>
		<p>The BLM should review the status of lands withdrawn for stock driveway use, and consider creating grassbanks if the area of land would be large enough to facilitate grassbank activities. WGFD recommends that salt and mineral locations within each grazing allotment be placed a minimum of ½ mile away from any water source and/or riparian area.</p>
		<p>WGFD recommends the BLM allocate forage resources for wildlife in order to sustain WGFD big game population objectives and other wildlife populations.</p>
		<p>WGFD recommends four additional 1-acre exclosures within the Table Mountain Wildlife Area, and proportionately manage livestock grazing AUMs to account for the existing and additional exclosures.</p>
		<p>WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.</p>
		<p>Have grassbanks been considered a key activity within the lands and realty program.</p>

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD is concerned about the BLM’s flexibility to do range improvements on active allotments. WGFD recommends grassbanks be included as a withdrawal action, and be incorporated into this program. Grassbanks set aside allotments and/or portions of allotments to facilitate vegetative restoration (range improvements) projects on existing active allotments (i.e., prescribed burns, wildland fire restoration, etc.).
CSL-0045	Wyoming Farm Bureau Federation	<p>Too much emphasis has been given to wildlife management and that more of a balance should occur in those areas where there are wildlife and livestock issues.</p> <p>Many livestock producers cannot utilize their leases or permits because of impediments created by Agency rules. An effort needs to be made by the Agency to become livestock friendly so that necessary changes to livestock operations can occur without the Agency being an impediment.</p>

Mineral Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	<p>The Casper RMP revision should mandate directional drilling to reduce wildlife habitat impacts.</p> <p>The Casper RMP revision should prohibit surface disposal of coal bed methane wastewater.</p> <p>The new RMP should forbid industrial development on floodplains.</p> <p>The Casper RMP revision should mandate the use of pitless drilling technology.</p>
CSL-0002	Anadarko Petroleum Corp.	<p>Ensure oil and gas resources are represented equally.</p> <p>Ensure the rights of private landowners are adequately accounted for.</p> <p>Rely on historic figures for determining average acreage disturbance per well location or mile of linear feet.</p> <p>Avoid undue delays in permitting oil and gas activities during RMP process.</p> <p>Resource monitoring must occur simultaneously with RMP to ensure that sufficient information is available to determine impacts.</p> <p>Allow development to occur during revisions of RMP.</p> <p>Prepare a “Statement of Adverse Energy Impact” for each alternative analyzed.</p> <p>Examine management options that would protect or enhance opportunities to explore for and develop oil and gas resources.</p> <p>Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.</p>

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0002 (continued)	Anadarko Petroleum Corp.	Discussion of potential stipulations regarding non-ESA species should recognize BLM’s lack of authority to enforce the stipulations or studies on private property.
		Allowance for application of new information, technology or economic conditions on lands with unknown, low and moderate oil and gas potential.
		Effects on opportunities to lease explore and develop oil and gas resources resulting from restrictive surface management decisions.
		Limiting stipulations that remain in effect after application of standard lease terms and conditions.
		When surface disturbance is determined in the RMP the “net effect of disturbance” should be used to calculate impacts.
		The effect of surface resource management decisions on future subsurface development opportunities and activities.
		Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry’s financial contributions to Wyoming schools, local, state and federal treasuries.
		Use “net acreage of disturbance” for impact analysis instead of RFD scenario.
		BLM must not make assumptions that industry can directional drill in any situation.
		Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
		The revised RMP must include a program to monitor the effectiveness of stipulations and conditions of approval.
		Specify in the RMP if and how valid existing lease rights could be impacted by the new leasing decisions.
		It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
		CSL-0009
CSL-0011	WGFD	Address the foreseeable level of oil and gas development and the probable impacts it has on wildlife and habitat.
		Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address the issue of roads in the floodplain.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
		Do not include lands within the boundaries of or adjoining Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) as lands targeted for disposal or mineral leasing.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
CSL-0014	Florenc Williamson	Manage for preservation of public lands (no development).
CSL-0017	Bjork, Lindley, Little, PC	Incorporate the Energy Policy and Conservation Act inventory results into the plan decision.
		Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
		Recommend that the reasonably foreseeable development (RFD) scenario analyze sufficient potential development.
CSL-0030	Joe D. Reddick	Identify those areas where mineral resources exist - focusing on coal, oil and gas, and uranium.
		Only gravel all weather roads.
		Facilitate mineral development.
		Coordinate mineral development with other resources.
		Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
		Do not allow any "pits" for oil and gas production.
		Require appropriate reclamation at the end of projects (oil and gas, etc.) to restoring "vastness."
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
CSL-0032	Jess Rodgers	We suggest coalbed methane discharge be piped to the Platte River near Glenrock for replacing water "owed" to Nebraska.
		Convert abandoned oil and gas wells to water wells for livestock and wildlife use.
CSL-0040	Antelope Coal Company	If more stringent standards were to be proposed with the RMP they could restrict future coal mining in Converse County.

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0044	WGFD	WGFD recommends no leasing on WGFD Wildlife Habitat Management Areas, that BLM add a lease stipulation that pad spacing be no less than 80 acres within crucial wildlife habitats, and no more than 10 percent of the cumulative area in crucial habitats be disturbed at any point in time. WGFD recommends no more than 20 percent loss within a vegetative community (habitat type) to development, no surface disturbance within 1/2 mile of existing open water and/or riparian areas, and that directional drilling be encouraged within crucial wildlife habitats.
		WGFD requests the oil and gas program require mitigation of impacts, including off-site mitigation when necessary, and also require rehabilitation of production and adjacent areas to pre-development conditions.
		WGFD recommends the BLM not dispose of public lands where production has occurred simply because they have been developed (i.e., utilities and roads are present).
		WGFD believes the BLM's cumulative effects analysis of development (oil, gas, coal, etc.) has been inadequate in the past in individual environmental assessments (EA) and EISs. Cumulative effects of increased development are having a substantial impact on wildlife populations. The RMP should include a detailed description of the process that will be used for determining cumulative effects of projects during the life of the RMP.
CSL-0045	Wyoming Farm Bureau Federation	In areas where mineral development occurs on split estate lands, the Agency should ensure proper protections have been required of the mineral developer for the surface estate.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

National Historic Trails

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
CSL-0003	National Trust for Historic Preservation	Ensure adequate viewshed protection (e.g., buffer zone) for the Oregon/Mormon National Historic Trail within the RMP area.
		To protect National Historic Trails, attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.

National Historic Trails (continued)

Letter #	Author	Comment
CSL-0003 (continued)	National Trust for Historic Preservation	Attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0030	Joe D. Reddick	Maintain visual and physical integrity of historic trails.
		Be specific about compatible uses for historic trails.
		Protect pristine “ruts”/station sites of historic trails.
		Encourage public use of historic trails by marking routes.
		Provide recreational opportunity related to historic trails.
		Allow stratified use of trails (foot, horse, vehicle).
		Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.

Off-Highway Vehicles

Letter #	Author	Comment
CSL-0003	National Trust for Historic Preservation	BLM should comply with Section 106 of the NHPA prior to designating areas for off-road vehicle use.
CSL-0008	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Establish a current inventory of roads and trails for OHV use in Wyoming.
		Identify roads to be included in Wyoming ORV program.
		Address appropriate use of existing and future OHV use on public lands.
CSL-0011	WGFD	Evaluate impacts of off-highway vehicle use on wildlife habitat and wildlife’s use of habitat.
		The RMP should specifically address transportation planning that includes off-road use and its probable increase in the future.
CSL-0022	Billie Donovan	Close all-terrain vehicle (ATV) areas periodically.
CSL-0030	Joe D. Reddick	Minimize the number of roads.
		Allow stratified use of historic trails.
		Prohibit off road vehicle use except in designated areas including grazing areas.
		Provide ATV off road areas.
		Set noise limits on ATVs.
CSL-0031	G. Eugene Hardy	Restrict as much as possible the use of motorized vehicles (ATV) in particular, on BLM lands except on established trails and roads.
CSL-0036	Daniel Straka	There are adjacent BLM parcels west of the current boundaries that can be utilized to add an additional 80-240 acres to the area of the Poison Spider Park.

Off-Highway Vehicles (continued)

Letter #	Author	Comment
CSL-0036 (continued)	Daniel Straka	Another parcel of BLM land should be designated for OHV use so the user community has another destination choice.
		Poison Spider ORV Park should be renamed to Poison Spider OHV Park.
		Expand Poison Spider ORV Park.
		Poison Spider Park is over used; safety is an issue.
CSL-0037	Keith Parmely	Is there any other land available for another off-highway vehicle park in addition to Poison Spider?
		Are places like Deer Creek, Esterbrook, Bates Creek and such available for designated trails?
		Will the proceeds from the sales of the OHV stickers be used to establish new trails for OHV use?
		Make land available for off-highway vehicle use.
CSL-0038	Jeanne Leske	Be more diligent in monitoring ORV use.
		Do much more education so people understand what OHV use does to the land.
CSL-0042	J.R. Riggins	Create an additional OHV park similar to the Poison Spider Park within the Casper district. I'm not sure of a site and there may not be one that is suitable. The Poison Spider Park gets more and more use.
		Create a looping ATV trail system in areas that we know are frequented by off-road enthusiasts. Some of these areas are Muddy Mountain/Casper Mountain; Deer Creek; Esterbrook; Glendo.
		It's important to include in the RMP the ability for this district to accommodate the OHV recreational user under the new plan.

Recreation

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
CSL-0011	WGFD	The North Platte River provides a quarter million angling days per year. Access to North Platte River remains a critical issue.
		Support the creation of new reservoirs that provides sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area. Would like to coordinate with BLM to develop Recreation Management Area Management Plan for the 33-mile area.
CSL-0022	Billie Donovan	Hunt area 25 season is too long and the area is too big to manage.
CSL-0030	Joe D. Reddick	Provide horseback riding opportunities within 1 hour of Casper.
		Require a permit for all signs on public lands and remove the ones on public lands that imply private ownership.

Recreation (continued)

Letter #	Author	Comment
CSL-0030 (continued)	Joe D. Reddick	Provide access points signs and identify property lines so that public land visitors may more effectively use public lands.
		Encourage historical re-enactment.
		Provide recreational opportunity related to historic trails.
		Coordinate with other agencies to create a trail people can ride from Crow Agency, MT to Casper, WY.
		Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.
		Continue to emphasize the recreational opportunity of backcountry byways.
		Make Pine Ridge north of Glenrock available to public.
		Prohibit recreation events that are not related to the natural resources (e.g., motorcycle races, endurance horse races, paramilitary events).
		Provide the recreational opportunity of prairie dog shooting.
CSL-0038	Jeanne Leske	Advertise Muddy Mountain as it is very underutilized by the general public.
CSL-0041	Randy Shepperson	The BLM is currently fencing out stock trail lands for camping spots. This opens the door for all to pull lands out of trail.
CSL-0044	WGFD	WGFD recommends evaluation of the North Platte River corridor for additional access site developments, and develop and publish a North Platte River float guide in collaboration with WGFD personnel. WGFD recommends the BLM improve the road on the east side of Pathfinder Reservoir, which would include a crossing on Canyon Creek. The WGFD would like to collaboratively develop a recreational plan for the 33-Mile reservoirs.
		WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.
		WGFD recommends the BLM maintain all public lands adjacent to Rawhide and Table Mountain Wildlife Habitat Management Areas as accessible areas for public use for wildlife recreation activities, and purchase, trade, and/or exchange isolated parcels of public land to augment the existing parcels that border these Wildlife Habitat Management Areas to provide additional recreational opportunities.

Renewable Energy

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Prepare a “Statement of Adverse Energy Impact” for each alternative analyzed.
CSL-0018	Department of Energy	Department of Energy evaluating the feasibility of constructing a wind farm at Teapot Dome.

Social and Economic Conditions

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry’s financial contributions to Wyoming schools, local, state and federal treasuries.
		Address the costs of stipulations, mitigating measures and restrictive policies impose on industry projects, along with the economic impact to the state of Wyoming and local governments of reduced revenues.
		Address impacts on employment, delays in bringing production on line, and added costs for facilities as a result of BLM management policies as a result of BLM management policies.
CSL-0005	Wyoming Department of Agriculture	Consider the specific socioeconomic effect of all alternatives.
CSL-0011	WGFD	Consider the contribution of fishing and hunting, and estimates of the value of nonconsumptive wildlife uses, to the local and state economy.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
CSL-0013	State of Wyoming, Department of Environmental Quality	Address impacts from fire (smoke, public health, etc.).
CSL-0017	Bjork, Lindley, Little, PC	Recommend that the RFD scenario analyze sufficient potential development.
CSL-0033	Archie Bruner	The fundamentals of nature should be the foundation of land use and economic development to protect air, water, soil, and future life.
CSL-0035	Natrona County Development Department	Address impacts to Natrona County from wind energy, coal bed methane, and carbon dioxide production (such as the Anadarko project) in EIS.

Soil

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should forbid industrial development on floodplains.
CSL-0002	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.
		Use “net acreage of disturbance” for impact analysis instead of RFD scenario.
		The effect of surface resource management decisions on future subsurface development opportunities and activities.
CSL-0011	WGFD	Address the issue of roads in the floodplain.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
CSL-0017	Bjork, Lindley, Little, PC	Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
CSL-0044	WGFD	WGFD recommends no leasing on WGFD Wildlife Habitat Management Areas, that BLM add a lease stipulation that pad spacing be no less than 80 acres within crucial wildlife habitats, and no more than 10 percent of the cumulative area in crucial habitats be disturbed at any point in time. WGFD recommends no more than 20 percent loss within a vegetative community (habitat type) to development, no surface disturbance within ½ mile of existing open water and/or riparian areas, and that directional drilling be encouraged within crucial wildlife habitats.
CSL-0045	Wyoming Farm Bureau Federation	In areas where mineral development occurs on split estate lands, the Agency should ensure proper protections have been required of the mineral developer for the surface estate.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

Special Designations

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should survey for, identify, and protect lands of wilderness quality, including but not limited to South Fork of the Powder Roadless Area of Notches Dome.
		The BLM should designate all Prairie Dog complexes larger than 3,000 acres as areas of critical environmental concern with additional protections such as moratorium on recreational shooting.
CSL-0003	National Trust for Historic Preservation	Manage the Cedar Ridge-Badwater Creek area as a Special Management Area (SMA) to ensure adequate protection.

Special Designations (continued)

Letter #	Author	Comment
CSL-0011	WGFD	Designate special management areas for key wildlife habitats.
		Address the possibility and ramifications of nominating the North Platt River as an ACEC.
CSL-0012	Sierra Club	The Sierra Club would like to nominate the North Platte River Corridor area for ACEC designation.
		The Sierra Club would like to nominate the Casper Sand Dunes for ACEC designation.
		The Sierra Club would like to nominate Hole in the Wall/Red Wall for ACEC designation.
		The Sierra Club would like to nominate Muddy Mountain Environmental Education Center for ACEC designation.
		The Sierra Club would like to nominate South Fork of the Powder River Watershed for ACEC designation.
		The Sierra Club would like to nominate Emigrant Trails for ACEC designation.
		The Sierra Club would like to nominate Teapot Dome for ACEC designation.
		The Sierra Club would like to nominate the Pterodactyl Track area for ACEC designation.
		The Sierra Club would like to nominate the Table Mountain area for ACEC designation.
CSL-0030	Joe D. Reddick	Consider Little Medicine Falls for an ACEC.
CSL-0044	WGFD	WGFD recommends the BLM maintain all active Areas of Critical Environmental Concern, SMAs, and Recreation Management Areas.

Special Status Species

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should require adequate protection for sage grouse.
		The Casper RMP revision should require adequate protection for prairie dogs.
		The Casper RMP revision should adequately protect big game crucial ranges.
		The Casper RMP revision should adequately protect raptor nesting habitat.
		The Casper RMP revision should identify and protect mountain plover nesting habitat.
CSL-0004	WGFD	Incorporate Swift Fox conservation measures into RMP.
		Analyze the Swift Fox in EIS.
		Include Swift Fox on BLM state list of sensitive species.
CSL-0011	WGFD	The RMP should consider the sensitivity ratings of various non-game fish in habitat management.
		Designate special management areas for key wildlife habitats.

Special Status Species (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Implement seasonal stipulations to protect key wildlife habitats during important seasons of use.
		Adequate habitat for sensitive species and prevention of future listings of these species. Reference WGFD plan for high priority nongame species for habitat management in key areas.
CSL-0030	Joe D. Reddick	Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
CSL-0044	WGFD	WGFD recommends the BLM incorporate the following list of sensitive species into the RMP, in addition to the current lists. Native Species Status (NSS) 1: Hornyhead chub, Surgeon chub, Suckermouth minnow, Western Silvery minnow; NSS2: Plains topminnow; NSS3: Black bullhead; Common shiner; Flathead chub; Lake chub; Mountain sucker; Plains minnow; NSS4: Bigmouth shiner, Central stoneroller, Channel catfish, Iowa darter, Longnose sucker, Quillback, River carpsucker, Shorthead redhorse, Stonecat, Boreal chorus frog, Bullfrog, Great Basin spadefoot, Great Plains toad, Leopard frog, Plains spadefoot, Tiger salamander, Woodhouse toad; NSS5: Creek chub; NSS6: Brassy minnow, Fathead minnow, Plains killifish; NSS7: Johnny darter, Longnose dace, Red shiner, Sand shiner, White sucker.
CSL-0045	Wyoming Farm Bureau Federation	The lack of information relative to habitat needs of Threatened, Endangered, Candidate, and Sensitive species have lead the Agency to restrict other economic uses on federal lands in order to “be safe” even if the Agency is unsure. The Agency should be more aggressive in defending the multiple use mandate where habitat needs for listed or candidate and sensitive species is incomplete or lacking.

Transportation and Access

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
CSL-0009	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Maintain access to state lands for mineral development.
CSL-0011	WGFD	The RMP should specifically address transportation planning that includes off-road use and its probable increase in the future.
		Include and promote actions such as conservation easements and land exchanges to accomplish easy management and access.
		Consider access for anglers and hunters in realty actions.
		The North Platte River provides a quarter million angling days per year. Access to North Platte River remains a critical issue.

Transportation and Access (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address the effects of roads on wildlife and habitat, particularly in areas of intensive energy development.
		Address road management, particularly in reference to habitat fragmentation, habitat losses, and wildlife disturbance.
		Address the issue of roads in the floodplain.
CSL-0019	Edward J. Birgenheier	Access to and transportation on BLM lands needs to include equestrian use as an acceptable means of transportation and recreation use on all BLM land.
CSL-0022	Billie Donovan	Provide access to BLM land northeast of Casper in Area 25.
		Annoyed with subleasing rules. The State's policy is far more fair.
		Address people trespassing on private land.
CSL-0029	Facilitator Notes	Need access across private land to reach public lands.
CSL-0030	Joe D. Reddick	Minimize the number of roads.
		Require a permit for all signs on public lands and remove the ones on public lands that imply private ownership.
		Only gravel all weather roads.
		Protect historic Fort Fetterman and Little Medicine (Box Elder) Roads while allowing today's uses.
		Provide access points signs and identify property lines so that public land visitors may more effectively use public lands.
CSL-0030	Joe D. Reddick	Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.
CSL-0044	WGFD	WGFD requests the BLM target land acquisitions, trades, exchanges, and/or easements that facilitate increased public access to the North Platte River, access to adjacent public lands, grassbank creation, and management of crucial wildlife habitats.
		WGFD recommends evaluation of the North Platte River corridor for additional access site developments, and develop and publish a North Platte River float guide in collaboration with WGFD personnel. WGFD recommends the BLM improve the road on the east side of Pathfinder Reservoir, which would include a crossing on Canyon Creek. The WGFD would like to collaboratively develop a recreational plan for the 33-Mile reservoirs.
		WGFD recommends the BLM maintain all public lands adjacent to Rawhide and Table Mountain Wildlife Habitat Management Areas as accessible areas for public use for wildlife recreation activities, and purchase, trade, and/or exchange isolated parcels of public land to augment the existing parcels that border these Wildlife Habitat Management Areas to provide additional recreational opportunities.

Transportation and Access (continued)

Letter #	Author	Comment
CSD-0044 (continued)	WGFD	WGFD recommends the BLM consider the following: not create any new roads within crucial big game habitats, remove the “necessary tasks” statement (i.e., may go off-road to retrieve big game), maintain all public fishing access area roads a minimum of 2 times per year (includes borrow pits, culverts, crossings, etc.), develop erosion control measures when constructing new roads and/or maintaining existing roads, control non-native, invasive plant species along existing and/or new roads, evaluate existing roads to determine impacts to crucial and important wildlife habitats, close and rehabilitate unsuitable roads, and not permit construction of new roads in floodplains.
CSL-0045	Wyoming Farm Bureau Federation	Management problems have occurred because of misunderstandings by the public as to which lands are public and which are private.

Utility and Communication Corridors

Letter #	Author	Comment
CSL-0030	Joe D. Reddick	Do not allow above ground powerlines greater than 33 kv. Be specific about what are compatible uses for historic trails. Where roads have overlaid trails, don’t disallow utility corridor.

Vegetation

Letter #	Author	Comment
CSL-0011	WGFD	Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan. Address declining shrub (mahogany and sagebrush) habitat conditions for wildlife. Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002). In some areas a return to a more historical fire regime may be desirable. This comment pertains to state and management of communities. Maintain and improve key wildlife habitats. This includes improving sagebrush communities. BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives. Discuss management of riparian areas in an arid climate. The RMP should especially address Proper Functioning Condition (PFC). Riparian fencing needs to be constructed.

Vegetation (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address waterfowl nesting cover at Goldeneye Reservoir.
		Management of forest communities to maintain and enhance wildlife habitat is a concern.
		Address adequate management of non-native invasive plant species (e.g., cheatgrass, knapweed, etc.).
		Aspen habitat management will need specific attention.
		Manage forest cover habitat to maintain and enhance habitat and thus wildlife diversity.
		Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.
CSL-0024	Clyce McColloch	Become more aggressive with biological control of noxious weeds.
CSL-0029	Facilitator Notes	BLM should get more aggressive with biological control of noxious weeds.
		BLM needs to react to prescriptions when window is offered.
		Address prescriptions in mahogany on a landscape base.
CSL-0030	Joe D. Reddick	Use pasture size as a method to provide diversity of landscape.
CSL-0031	G. Eugene Hardy	Better invasive weed control is a must.
CSL-0033	Archie Bruner	Problem plants should be controlled.
CSL-0043	Robert, Rita and Jock Campbell	It is in the best interest to continue the cooperative agreements with relevant weed and pest control districts.
		Adjacent surface owners need to have an interest in any integrated weed management program.
CSL-0044	WGFD	Aspen should be specifically included as a resource that will benefit from the use of fire, and fire should be actively reintroduced back into the aspen community.
		Incorporate a provision into the fire program that will allow for the use of chemicals to prevent, reduce, and/or control the potential that exists for establishment and/or expansion of weed species. This provision should be programmatic in planning processes, including post-management activities following a wildland fire.
		WGFD is concerned about the BLM's flexibility to do range improvements on active allotments. WGFD recommends grassbanks be included as a withdrawal action, and be incorporated into this program. Grassbanks set aside allotments and/or portions of allotments to facilitate vegetative restoration (range improvements) projects on existing active allotments (i.e., prescribed burns, wildland fire restoration, etc.).
		Have grassbanks be considered a key activity within the lands and realty program.

Vegetation (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD recommends the BLM manage vegetative communities for Potential Natural Community, which includes a diversity of grasses and forbs and uneven age classes of shrubs, and that management goals be based on a watershed level.
		WGFD recommends the BLM add a section to include aspen management. Aspen inventories should be promoted and on a regular basis, using adequate sampling methodologies. We request the BLM actively manage aspen stands to increase the amount of aspen acres by 80 percent by the year 2010, treat a minimum of 400 acres of aspen and/or potential aspen sites every 3 years, and conduct monitoring strategies to measure success of the treatments.
		WGFD recommends the BLM actively restore vegetation in those areas where past management activities have removed native vegetation (i.e., big sagebrush spray areas, wildfires, disturbed areas, etc.). We recommend the BLM actively manage big sagebrush/grassland communities to move 30 percent of this community toward Potential Natural Community by the year 2010, with an emphasis on the watershed level.
		WGFD requests the BLM change riparian area management designations from PFC to Potential Natural Community. This change in management would remove some, if not all, of the subjectivity that currently occurs within the PFC rating system.
		WGFD requests 95 percent of riparian areas within the Casper Planning Area meet Potential Natural Community by the year 2015. This would require monitoring progress on WGFD priority areas every 3 years in cooperation with WGFD personnel and permittees, using collaboratively developed processes. We recommend utilization levels on preferred herbaceous species not exceed 40 percent during the growing season (hot season), and utilization levels on preferred browse (woody) species not exceed 30 percent leader use annually. Stubble height on upland areas at the end of the grazing season should be a minimum of 6 inches, and greater than 6 inches along streams with critical fisheries habitats and/or easily eroded streambanks. Placement of livestock salt and mineral facilities should be a minimum of ½ mile from a water source and/or riparian area.
		WGFD recommends the BLM change the designation from noxious weed to non-native, invasive plant species. Facilitate management of non-native plants not designated on the state noxious weed list.
CSL-0045	Wyoming Farm Bureau Federation	The BLM should aggressively treat weed infestations with the most cost effective means at their disposal.

Visual Resources

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	BLM should make it clear that visual resource management (VRM) decisions are on an equal footing with other resource considerations.
		Management decisions for the various VRM inventory classification must give consideration to other factors such as recreational user days, mineral development potential, management and presence of other existing resource uses.
CSL-0003	National Trust for Historic Preservation	Provide adequate buffer zones to ensure that surface activities will not adversely impact the viewshed for National Historic Trails.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0011	WGFD	Timber harvest on private lands bordering BLM lands in some areas increases the concern for landscape considerations on BLM lands.
CSL-0015	Mahlon and Joan Frankhauser	Preserve public lands and scenic beauty.
CSL-0030	Joe D. Reddick	Maintain visual and physical integrity of historic trails.
		Develop visual mitigation measures for protecting the feeling of vastness.
		Develop road density standards to protect scenic vastness of area.
		Require appropriate reclamation at the end of projects (oil and gas, etc.) to restoring “vastness.”

Water Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should prohibit surface disposal of coal bed methane wastewater.
		The new RMP should forbid industrial development on floodplains.
CSL-0002	Anadarko Petroleum Corp.	Ensure that all possible methods for handling coal bed methane produced water are addressed.
CSL-0010	State of Wyoming, Department of Environmental Quality	Address discharge and handling of produced water from the oil and gas industry.
CSL-0011	WGFD	Support the creation of new reservoirs and development plan that provides sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area.
		Address protection of springs and seeps.
		Suggest protecting springs and seeps through fencing and adjacent water development.
		Address the issue of roads in the floodplain.

Water Resources (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of the crossing.
		Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan.
CSL-0021	Unknown	Add more water development on public lands to benefit livestock and wildlife.
CSL-0030	Joe D. Reddick	Do not allow anyone to hold livestock water rights except citizens of the United States of America.
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
		Encourage more water developments for livestock and wildlife.
CSL-0032	Jess Rodgers	Address coal bed methane discharge water.
		We suggest coal bed methane discharge be piped to the Platte River near Glenrock for replacing water “owed” to Nebraska.
		Convert abandoned wells to water wells to support greater number of AUMs and wildlife.
CSL-0043	Robert, Rita and Jock Campbell	Spring developments with watering facility such as storage tanks would aid in more available water for livestock and wildlife and would help achieve management objectives.
CSL-0044	WGFD	WGFD requests the BLM evaluate each reservoir for multiple uses, including fisheries, waterfowl, wildlife, and livestock grazing management. WGFD requests the design of these reservoirs be such that the upper areas provide shallow water habitat (maximum of 2 feet deep), which includes emergent vegetation for waterfowl habitat.
CSL-0045	Wyoming Farm Bureau Federation	Inventories and assessments of water bodies on BLM land should occur in accordance with state of Wyoming criteria and closely coordinated with the state of Wyoming.

RMP Revision Process

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The BLM should consult with the tribes indigenous to the Casper Field Office.
CSL-0003	National Trust for Historic Preservation	Outline cultural issues and potential areas of interest at outset of RMP process.
		Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Follow mandates in BLM’s CRMP manual.
CSL-0005	Wyoming Department of Agriculture	Coordinate with ranchers.
		Work cooperatively with public and interested stakeholders.

RMP Revision Process (continued)

Letter #	Author	Comment
CSL-0008	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Mitigation measures need to be included in RMP EIS.
CSL-0011	WGFD	BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives. With increasing intensity of land uses (energy development, recreation) the need for increased cumulative analysis of effects at the local and regional scale is a concern.
CSL-0041	Randy Shepperson	Consider a more incentive oriented BLM Plan, for example members working with the BLM should get faster streamlined improvements.

Mitigation Measures

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access. The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP. Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
CSL-0011	WGFD	Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction. Riparian fencing needs to be constructed. Suggest protecting springs and seeps through fencing and adjacent water development. Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of the crossing. The RMP should mitigate for development. Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.
CSL-0032	Jess Rodgers	We suggest coal bed methane discharge be piped to the Platte River near Glenrock for replacing water “owed” to Nebraska. Convert abandoned wells to water wells to support greater number of AUMs and wildlife.

Mitigation Measures (continued)

Letter #	Author	Comment
CSL-0044	WGFD	WGFD requests the oil and gas program require mitigation of impacts, including off-site mitigation when necessary, and also require rehabilitation of production and adjacent areas to pre-development conditions.
CSL-0045	Wyoming Farm Bureau Federation	There are several management options which could help mitigate these misunderstandings. In areas where land ownership can be adjusted, the BLM needs to aggressively pursue these options if there is a willingness by the landowner to trade or purchase BLM lands.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

Cumulative Impacts

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
CSL-0002	Anadarko Petroleum Corp.	The effect of surface resource management decisions on future subsurface development opportunities and activities should be considered.
CSL-0005	Wyoming Department of Agriculture	Discuss the cumulative impacts to ranchers.
CSL-0011	WGFD	Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.
		Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002).
		With increasing intensity of land uses (energy development, recreation) the need for increased cumulative analysis of effects at the local and regional scale is a concern.
CSL-0018	Department of Energy	Department of Energy is evaluating the feasibility of constructing a wind farm at Teapot Dome.
CSL-0044	WGFD	WGFD believes the BLM's cumulative effects analysis of development (oil, gas, coal, etc.) has been inadequate in the past in individual EAs and EISs. Cumulative effects of increased development are having a substantial impact on wildlife populations. The RMP should include a detailed description of the process that will be used for determining cumulative effects of projects during the life of the RMP.

Regulatory Compliance

Letter #	Author	Comment
CSL-0003	National Trust for Historic Preservation	Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
		Integrate Section 110 of the NHPA into the RMP process by identifying, evaluating, and nominating properties to the National Register.
		Adequately integrate FLPMA's multiple use mandates into RMP process.
		BLM should comply with Section 106 of the NHPA prior to designating areas for off-road vehicle use.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.
CSL-0005	Wyoming Department of Agriculture	Follow all regulations and guidelines.
CSL-0007	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	Follow regulatory guidelines for cultural resources.
CSL-0013	State of Wyoming, Department of Environmental Quality	Review air quality regulations relative to their management regulations.
CSL-0031	G. Eugene Hardy	It is a mistake to make the public aware of items or sites of interest (archeological/historic/cultural/etc.).

Valid Existing Management to be Carried Forward Comments

Letter #	Author	Comment
CSL-0011	WGFD	Several good initiatives were presented in the previous RMP that we would like to see continued in the upcoming revision, and an increased implementation of them.
CSL-0026	Joe Johnson	Likes things just like they are.
CSL-0027	Bernard McGuire, Jr.	The BLM is running the public lands as well as it can be. Would like to see it remain the same.
CSL-0028	Tom Preuit	Wants his grazing lease to stay the way it is now.
CSL-0030	Joe D. Reddick	Continue to emphasize the recreational opportunity of backcountry byways.