

BLM

10-6-06

3241 Boxelder  
Cheyenne, WY 82002

Casper Field Office  
#987 Prosper Office  
Casper, WY. 82604

00024

Dear Sirs:

RE: Management Plan for 1.4 million acres  
of Public land in Natrona, Converse, Platte  
and Goshen Counties.

I understand you have just released your  
management plan for the above RE, and  
it calls for major degradation of the  
natural environment to appease the  
wants of the energy industry.  
The plan calls for disposal of all BLM public  
land in Platte and Goshen County, as well  
as the majority of public lands in Converse  
County. Lands adjacent to Guernsey State Park  
FT. Laramie National Historic Site, lands along the  
California, Oregon, Mormon and Pony Express trails,  
BLM lands adjacent to the Forest Service's Downs  
and La Bonte Canyon Roadless Areas, the table  
Mountain Wildlife Area, as well as lands along

the famous Pine Ridge are all slated for disposal.

In addition, the number of acres protected as Areas of Critical Environmental Concern, a special designation to protect environmentally sensitive lands, decreased from 217,253 in the existing plan to 19,999 acres in the proposed plan. Many deserving areas were not given ACEC protection including the Southern Big Horns / Red Wall, Muddy Mountain, Cedar Ridge, North Platte River, and the Black-Tailed Prairie Dog Complex.

Protections for the most sensitive wildlife habitats are symbolic; the BLM is still using zoning limitations that allow industrial development in sage grouse breeding and nesting habitats, big game winter ranges, and raptor nesting areas if it's done in the off-season. Even in the face of mounting scientific evidence that wildlife is declining when these measures are applied. At the very least, the BLM needs to desallow surface

occupancy of these areas.  
 In northern Natrona County there exists one of the best examples of mixed<sup>00824</sup> grass prairie remaining in North America. The BLM has failed to protect most of this area except for a small area just south of the Hole in the Wall. In addition a portion of the area known as the South Fork of the Powder River qualifies for wilderness, but the BLM failed to evaluate and protect this area.

I would like to see the BLM undertake the following regarding the above comments

1. a more thorough analysis of the tracts of land slated for disposal undertaken. Important historical sites, land adjacent to Forest Service holdings, and important wildlife and recreational lands should be retained in public ownership.

2. I would ask that the following areas join in Jackson Canyon and the Alcoa Fossil

Area as Areas of Critical Environmental <sup>14</sup>  
Concern:

a. Southern Bighorn / Red Wall, the <sup>00024</sup> entire  
372,872 acres for outstanding scenery  
and important grassland ecosystem.

b. Cedar Ridge - For cultural resources

c. Black-tailed Prairie Dog Complex because  
of the rarity of this species throughout  
the North American Prairie.

d. The North Platte River from Alcona  
Reservoir to Casper, for its outstanding  
fisheries, scenery, historical significance  
and recreation.

3. The South Fork of the Powder River to  
be proposed for wilderness designation.

4. More stringent controls on oil & gas  
leasing. It's important that wildlife  
habitat and environmentally sensitive  
areas be placed off-limits to oil & gas  
development.

Sincerely,  
Albert Richard Bitner - Biologist