



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Wind River/Bighorn Basin District
101 South 23rd Street
Worland, Wyoming 82401-0119

IN REPLY REFER TO:
1610/1790 (WYR000)

Bighorn Basin LGCA
c/o Keith Grant
Big Horn County Commission
P.O. Box 31
Basin, WY 82410

NOV 10 2011

Dear Local Government Cooperating Agency,

We received your comments on the Draft Environmental Impact Statement (EIS) for the Bighorn Basin Resource Management Plan Revision Project (BB RMP), which was addressed to Caleb Hiner, RMP Project Lead. This letter serves as the required response under the Data Quality Act (DQA) and as a stepping stone to future communication.

A portion of your comments, specifically Appendix F, asserts several objections to data and information presented in the Draft EIS and alleges that the Bureau of Land Management (BLM) has not followed the DQA. The Data Quality Challenge (DQC) requires that complaints be specific, and your letter identifies four specific areas: 1) lands with wilderness characteristics inventory; 2) conflicting or incorrect acreage on nonnative annual bromes; 3) mule deer population and habitat quality and quantity declines and 4) apparent conflict between Geographic Information System (GIS) data and maps in the Draft EIS.

Inventory of Lands with Wilderness Characteristics

DQC: The LGCAs assert that the BLM was “remiss in not considering readily available in-house data and other readily available data sources for structures when designating their LWCs.”

Agency Response: Section 201 of Federal Land Policy Management Act (FLPMA) requires the BLM to maintain inventories of public land resources, including lands with wilderness characteristics. In accordance with this FLPMA mandate, the Worland and Cody field offices each initiated an inventory of lands with wilderness characteristics in 2009, utilizing an inventory process that had been successfully implemented by BLM Oregon field offices.

On July 26, 2011, while the Draft BB RMP EIS was undergoing public comment, BLM issued Instruction Memorandum (IM) 2011-154 which set forth BLM’s policy on the methods for conducting and maintaining wilderness characteristics inventories, as required under FLPMA

Section 201, and provided guidance on how to consider lands with wilderness characteristics in the land use planning process.

The BLM used “readily available data sources,” where appropriate, in developing its wilderness characteristics inventories for the Worland and Cody field offices. For example, the BLM staff relied on their professional knowledge of the naturalness of the area based on multiple years of observation through field work. In addition, multiple GIS data layers were used to augment staff recollections of field observations.

Some of the data sources identified in your comment are not appropriate for the inventory process, such as the Recreation Opportunity Spectrum (ROS). ROS is a management tool for the recreation program and does not necessarily reflect the on-the-ground characteristics, and is therefore not appropriate for the inventory process. Concerning miles of “roads” quite a bit of debate may continue to occur, but in several instances, the boundary of the LWC is a road. It appears the boundary roads were included as being part of the LWC in the data provided by the Local Government Cooperating Agencies (LGCAs). Further, the LGCAs assert there are several wells within the LWCs. Review of the GIS data indicates the wells within LWCs are either 1) plugged and abandoned 2) shut-in or 3) the permit has expired (i.e. the well was never drilled). Presence of range improvement projects, fences and small reservoirs does not preclude wilderness characteristics as noted in IM 2011-154:

Examples of human-made features that may be considered substantially unnoticeable in certain cases are: trails, trail signs, bridges, fire breaks, pit toilets, fisheries enhancement facilities, fire rings, historic properties, archaeological resources, hitching posts, snow gauges, water quantity and quality measuring devices, research monitoring markers and devices, minor radio repeater sites, air quality monitoring devices, fencing, spring developments, barely visible linear disturbances, and stock ponds.

Corrective Action: No corrective action is necessary. As part of the RMP revision process, BLM will review all public comments on the LWC management alternatives presented in the Draft RMP. BLM also will review field data collected by BLM staff in 2010 and 2011, as well as information about wilderness characteristics submitted by LGCAs and other members of the public, in order to continue to refine LWC inventories as new information may be obtained.

Point of Contact: Cody Field Manager (Mike Stewart) and Worland Field Manager (Karla Bird).

Anticipated corrected date: No corrective action is necessary. The Final EIS and Proposed BB RMP will rely on any updated inventory information available at that time.

Acres of nonnative annual bromes

DQC: The challenge notes that two estimated acreages are provided in the Draft RMP for nonnative annual bromes. One section of the Draft RMP refers to 57,000 acres of nonnative annual bromes within the planning area, whereas another refers to 37,505 acres for BLM surface estate and 46,875 for BLM mineral estate.

Agency Response: The nonnative annual brome acreage figures are from two different sources. Table 3-22 of the Draft EIS provides 37,505 acres for BLM surface estate and 46,875 for BLM mineral estate and cites the sources as Wyoming GAP Analysis Project, 2008. This Wyoming GAP data represents dominate vegetation types on a coarse scale. The data on annual bromes presented in Section 3.4.4 of the Draft EIS states an estimated 57,000 acres were infested in the Worland Field Office in 2007. The difference between these two data sources is scale and intensity. An area may be infested with annual brome and still be classified as some other plant community in the Wyoming GAP Analysis Project data.

Corrective Action: No corrective action is necessary. BLM notes that LANDFIRE, data on vegetation, was released in early 2011. The BLM will consider the pros and cons of using LANDFIRE data for the Final EIS.

Point of Contact: BB RMP Lead (Caleb Hiner)

Anticipated corrected date: No corrective action is necessary. The Final EIS and Proposed Plan will disclose all data sources used in the EIS.

Statements on declines in mule deer population and habitat quality and quantity

DQC: The challenge states it is unclear how the BLM can support the statement “mule deer are generally declining in numbers due to a decline in habitat quality and quantity.”

Agency Response: The statement does not claim that woody plant community condition is the only variable negatively affecting mule deer. Quality and quantity of habitats is not specific to just the vegetation community alone. Habitat disturbances, and disruptive activities, i.e. fragmentation, also affect habitat quality and quantity. In reference to the woody plant communities, using the same reference that the LGCA's used on this issue; Gill et al. (1999) reports "degradation of seral shrub communities as a result of fire suppression" as one of four principle agents of change operating on deer habitats in Colorado." Preceding this, Gill et al. states, "The performance of Colorado mule deer populations is inextricably linked to the amount and quality of habitat required to meet their needs to reproduce successfully and to survive. It is clear that habitats used by deer are changing. These changes, in turn, may explain the widely observed decline in the abundance, distribution and performance of deer populations."

Corrective Action: Appropriate references will be added to the final.

Point of Contact: BB RMP Lead (Caleb Hiner)

Anticipated corrected date: The Final EIS and Proposed BB RMP will provide supporting references.

GIS Maps

DQC: The challenge states that the Draft RMP and EIS maps are not reproducible from the BLM- provided data or appear to conflict with the BLM's GIS data.

Agency Response: BLM provided GIS data to the LGCAs in accordance with the Memorandum of Understanding governing the cooperating agency relationship. Should a qualified third party desire to reproduce this data, it would need to be reproduced through the compilation of various resource data layers and be correlated with the appropriate constraint. The BLM provided the intermediate data, containing both the resource data and the constraint, to assist the cooperating agencies in understanding the relationship between the resource data and the constraint.

Corrective Action: While no corrective action is necessary, the BLM will assist in clarifying and simplifying the GIS data for each resource or map. Further, a table of acreages and sources will be included with the Final EIS.

Point of Contact: BB RMP Lead (Caleb Hiner)

Anticipated corrected date: No corrective action is necessary. Simplified data will be provided for the Final EIS. The Final EIS and Proposed BB RMP will provide a table of acreages and sources.

We appreciate your interest in assuring the BB RMP provides the most accurate information available.

Sincerely,



Steve Dondero

District Manager

Wind River Bighorn Basin District