



## WYOMING GAME AND FISH DEPARTMENT

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November 8, 2013

WER 12933.01  
Bureau of Land Management  
Casper Field Office  
Environmental Assessment  
Finding of No Significant Impact and Decision Record  
Forest Management on  
Casper Mountain, Negro Hill, and Banner Mountain  
Converse and Natrona Counties

Cindy Allen, Forester  
Bureau of Land Management  
Casper Field Office  
2987 Prospector Drive  
Casper, WY 82604-2968

Dear Ms. Allen:

The staff of the Wyoming Game and Fish Department has reviewed the Environmental Assessment, Decision Record and Finding of No Significant Impact documents concerning the Forest Management on Casper Mountain, Negro Hill, and Banner Mountain. We offer the following comments for your consideration.

#### *4.1.4 Wildlife*

As noted in this analysis, the project planning area contains significant acreage of the Natrona sage-grouse core area. Treatments in core area should comply with WY IM 2012-019, which corresponds with Executive Order 2011-5 and replaced WY IM 2010-012, as well as WGFD Protocols for Treating Sagebrush. If the treatment is located in suitable habitat, the Density/Disturbance Calculation Tool (DDCT) process should be completed according to WY IM 2013-035. Unsuitable habitat should be determined using updated (October 2012) Executive Order 2011-5 Appendix 1 suitability language (enclosed) and Attachment B Specific Stipulations #4. If the treatment is in unsuitable habitat, documentation of the pre-treatment habitat should be included in the project record.

#### *4.2 Mitigation Measures Considered*

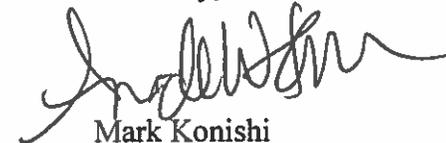
Process and stipulations for development as outlined in Executive Order 2011-5 should be considered as mitigation measures for treatment activity in sage-grouse core area.

Cindy Allen  
November 8, 2013  
Page 2 of 2 - WER 12933.01

In addition to inspecting trees for migratory bird nests prior to treatment, we recommend intensive raptor surveys are conducted in proposed treatment areas prior to activity.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Heather O'Brien, Casper Wildlife Biologist, at (307) 473-3411.

Sincerely,



Mark Konishi  
Deputy Director

MK/mf/gb

Enclosure

1) Appendix 1 Suitable Sage-Grouse Habitat Definition – FINAL (Oct. 2012)

cc: USFWS  
Heather O'Brien – WGFD, Casper Region  
Justin Binfet – WGFD, Casper Region

## Appendix 1 Suitable Sage-Grouse Habitat Definition - FINAL

Sage-grouse require somewhat different seasonal habitats distributed over large areas to complete their life cycle. All of these habitats consist of, are associated with, or are immediately adjacent to, sagebrush. If sage-grouse seasonal habitat use maps do not exist for the project site the following description of suitable habitat should be used to determine areas of unsuitable sage grouse habitat for development siting purposes. An abbreviated description of a complex system cannot incorporate all aspects of, or exceptions to, what habitats a local sage-grouse population may or may not utilize. Refer to the Bureau of Land Management's Sage-Grouse Habitat Assessment Framework for further information.

"Suitable" sage-grouse habitat (nesting, breeding, brood-rearing, or winter) is within the mapped occupied range of sage-grouse, and:

- 1) has 5% or greater sagebrush canopy cover (for nesting, brood-rearing and/or winter) as measured by the point intercept method. "Sagebrush" includes all species and sub-species of the genus *Artemisia* except the mat-forming sub-shrub species: *frigida* (fringed) and *pedatifida* (birdfoot); or
- 2) is riparian, wet meadow (native or introduced) or areas of alfalfa or other suitable forbs (brood rearing habitat) within 275 meters of sagebrush habitat with 5% or greater sagebrush canopy cover (for roosting/loafing); or
- 3) is reclaimed habitat containing at least 2 native grasses (at least one bunchgrass) and 2 native forbs (see "reclamation" in Attachment B) and no point within the grass/forb habitat is more than 60 meters from adjacent 5% or greater sagebrush cover; or
- 4) is "transitional" sage-grouse habitat which is land that has been treated or burned prior to 2011 resulting in < 5% sagebrush cover but is actively managed to meet a minimum of 5% sagebrush canopy cover with associated grasses and forbs by 2021 (as determined by analysis of local condition and trend) and may or may not be considered "disturbed". Land that doesn't meet the above vegetation criteria by 2021 should be considered disturbed.

Habitat treatments conducted after 2010 must meet the current Wyoming Game And Fish Department Protocols For Treating Sagebrush To Be Consistent With Wyoming Executive Order 2011-5; Greater Sage-Grouse Core Area Protection or the habitat treated will be considered disturbed. Following wildfire, lands shall be considered "disturbed" pending an implemented management plan with trend data showing the area returning to functional sage grouse habitat.

"Unsuitable" sage-grouse habitat<sup>1</sup> is land within the historic range of sage-grouse that did not, does not, nor will not provide sage-grouse habitat due to natural ecological

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<sup>1</sup> The BLM Habitat Assessment Framework (HAF) definition of "unsuitable" includes both "disturbed" and "unsuitable" habitats as defined above.

conditions such as badlands, canyons or forests. See "Specific Stipulation" number 4 in Attachment B for conditions under which less restrictive stipulations may be applied to unsuitable habitats.

"Disturbed" suitable sage-grouse habitat<sup>1</sup> is land that has been converted from formerly suitable habitat to grasslands, croplands, mined or otherwise physically disturbed areas. To evaluate the 5% disturbance cap per average 640 acres using the Disturbance/Density Calculation Tool (DDCT), suitable habitat is considered disturbed when it is removed and unavailable for immediate sage-grouse use. These areas may provide habitat at some time in the future through succession or restoration. Disturbed suitable habitats could also include those permanent disturbances such as major reservoirs and cities that once were considered suitable.

The following items are guidelines for determining disturbed habitat for the DDCT process:

- a. Long-term removal occurs when habitat is physically removed through activities that replace suitable habitat with long term occupancy of unsuitable habitat such as a road, well pad or active mine.
- b. Short-term removal occurs when vegetation is removed in small areas, but restored to suitable habitat within a few years of disturbance, such as a successfully reclaimed pipeline, or successfully reclaimed drill hole or pit.
- c. There may be additional suitable habitat considered disturbed between two or more long term (greater than 1 year) anthropogenic disturbance activities with a footprint greater than 10 acres each if the activities are located such that sage grouse use of the suitable habitat between these activities is significantly reduced due to the close proximity (less than 1.2 miles apart, 0.6 mile from each activity) and resulting cumulative effects of these large scale activities. Exceptions may be provided.
- d. Land in northeast Wyoming (Figure 1 of Attachment B) that has had sagebrush removed post-1994 (based on Orthophoto interpretation), and not recovered to suitable habitat will be considered disturbed when using the DDCT.



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## Fwd: Casper Mountain EA

1 message

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Mon, Dec 16, 2013 at 3:47 PM

From: **Bill McDowell** <[bmcdowell@natronacounty-wy.gov](mailto:bmcdowell@natronacounty-wy.gov)>  
Date: Wed, Oct 30, 2013 at 10:41 AM  
Subject: Casper Mountain EA  
To: [retzelmi@blm.gov](mailto:retzelmi@blm.gov), [jmeyer@blm.gov](mailto:jmeyer@blm.gov)  
Cc: Commissioners <[commissioners@natronacounty-wy.gov](mailto:commissioners@natronacounty-wy.gov)>

Rhen,

I Received the EA for Casper Mountain today, we will work hard to review prior to the deadline. I would ask you to review "finding of no significant impact" page 5, item 3 at the top of the page first sentence—"there are no known park lands .....". REFERS TO FEDERAL PARK LANDS AND NOT COUNTY PARK LANDS.

THANKS FOR YOUR REVIEW AND RESPONSE.

BILL

Bill McDowell

Natrona County Commissioner

307.235.9271

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