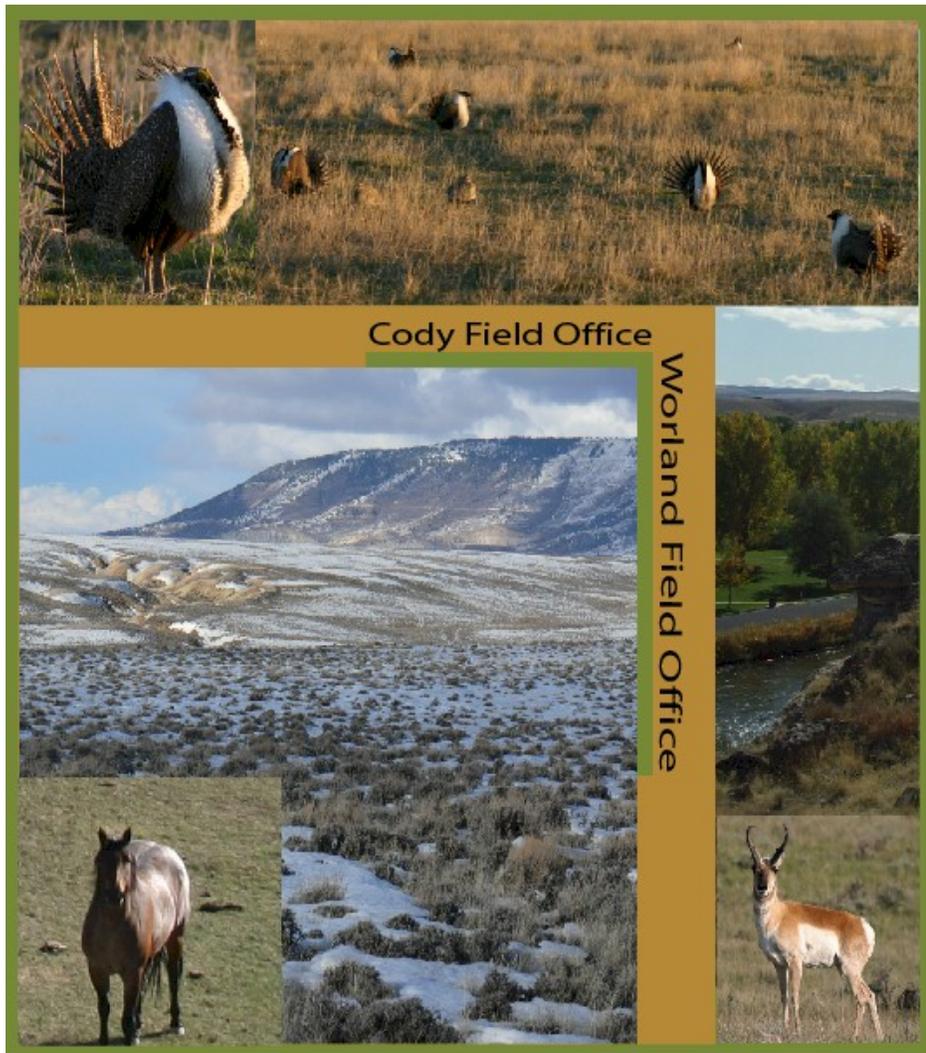


Scoping Report Bighorn Basin Resource Management Plan Revision Project



Wyoming State Office

March 20, 2009



It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

SCOPING REPORT

BIGHORN BASIN RESOURCE MANAGEMENT PLAN REVISION PROJECT



**United States Department of the Interior
Bureau of Land Management
Cody Field Office, Wyoming
Worland Field Office, Wyoming**

March 20, 2009

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ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
AMS	Analysis of Management Situation
AUM	Animal unit month
BB RMP	Bighorn Basin Resource Management Plan
BLM	Bureau of Land Management
CBNG	Coalbed Natural Gas
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CYFO	Cody Field Office
DOI	U.S. Department of the Interior
EIS	Environmental impact statement
EPA	Environmental Protection Agency
FLPMA	Federal Land Policy and Management Act
GIS	Geographic Information Systems
IMP	Interim Management Policy for Lands under Wilderness Review
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NSO	No Surface Occupancy
OHV	Off-highway vehicle
RFA	Reasonably Foreseeable Action or Activity
RMP	Resource Management Plan
U.S.	United States
WFO	Worland Field Office
WSA	Wilderness Study Area
WSR	Wild and Scenic River

1.0 INTRODUCTION

1.1 Project Overview

The United States (U.S.) Department of the Interior (DOI), Bureau of Land Management (BLM) issued a Notice of Intent (NOI) on October 17, 2008 to prepare the Bighorn Basin Resource Management Plan (BB RMP) Revision and associated Environmental Impact Statement (EIS). The BB RMP Revision Project is a combined effort revising the Resource Management Plans (RMPs) for both the BLM Cody Field Office (CYFO) and BLM Worland Field Office (WFO) in Wyoming. For the purpose of this document, the combined CYFO and WFO planning areas will be called the Planning Area. Public lands within the Planning Area are currently managed according to three RMPs: the Cody RMP (1990) for the CYFO; and the Washakie RMP (1988) and Grass Creek RMP (1998) for the WFO. The revisions of these three plans will be managed as a single project collectively referred to as the Bighorn Basin RMP Revision Project with a single EIS. Each field office will issue a Record of Decision and an RMP for its jurisdictional area at the end of the planning process. The BB RMP project is scheduled for completion by September 2011.

The RMP and EIS will address management for BLM-administered lands including surface lands and federal mineral estate in the Planning Area. The Planning Area includes all of Big Horn, Park, and Washakie Counties, and most of Hot Springs County in north-western Wyoming (**Figure 1**).

1.1.1 Purpose and Need for the Plan Revision

An RMP is a land use plan that provides broad multiple-use direction for managing public lands administered by the BLM. The Federal Land Policy and Management Act (FLPMA) directs the BLM to develop such land use plans to provide for appropriate uses of public land. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. The RMP establishes goals and objectives (desired outcomes) for resource management and the measures needed to achieve them. These measures are expressed as management actions and allowable uses (i.e., lands that are open or available for certain uses [including any applicable restrictions] and lands that are closed to certain uses).

The Cody RMP (1990), the Washakie RMP (1988), and Grass Creek RMP (1998), which currently address the BLM's land management activities in the Bighorn Basin, do not address all of the new and emerging issues in the Planning Area. Laws, regulations, policies, and issues regarding management of these public lands have changed during the life of the each of the three plans. The BLM is developing a new RMP to ensure compliance with current mandates and to address current issues in the Planning Area. During the revision process, decisions in the existing RMPs that are determined to still be valid may be brought forward in the BB RMP. When completed, the revised RMP will replace the existing RMPs.

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, federal agencies are required to consider the environmental impacts of their proposed actions before implementing these actions. Major federal actions are subject to NEPA. The BB RMP is

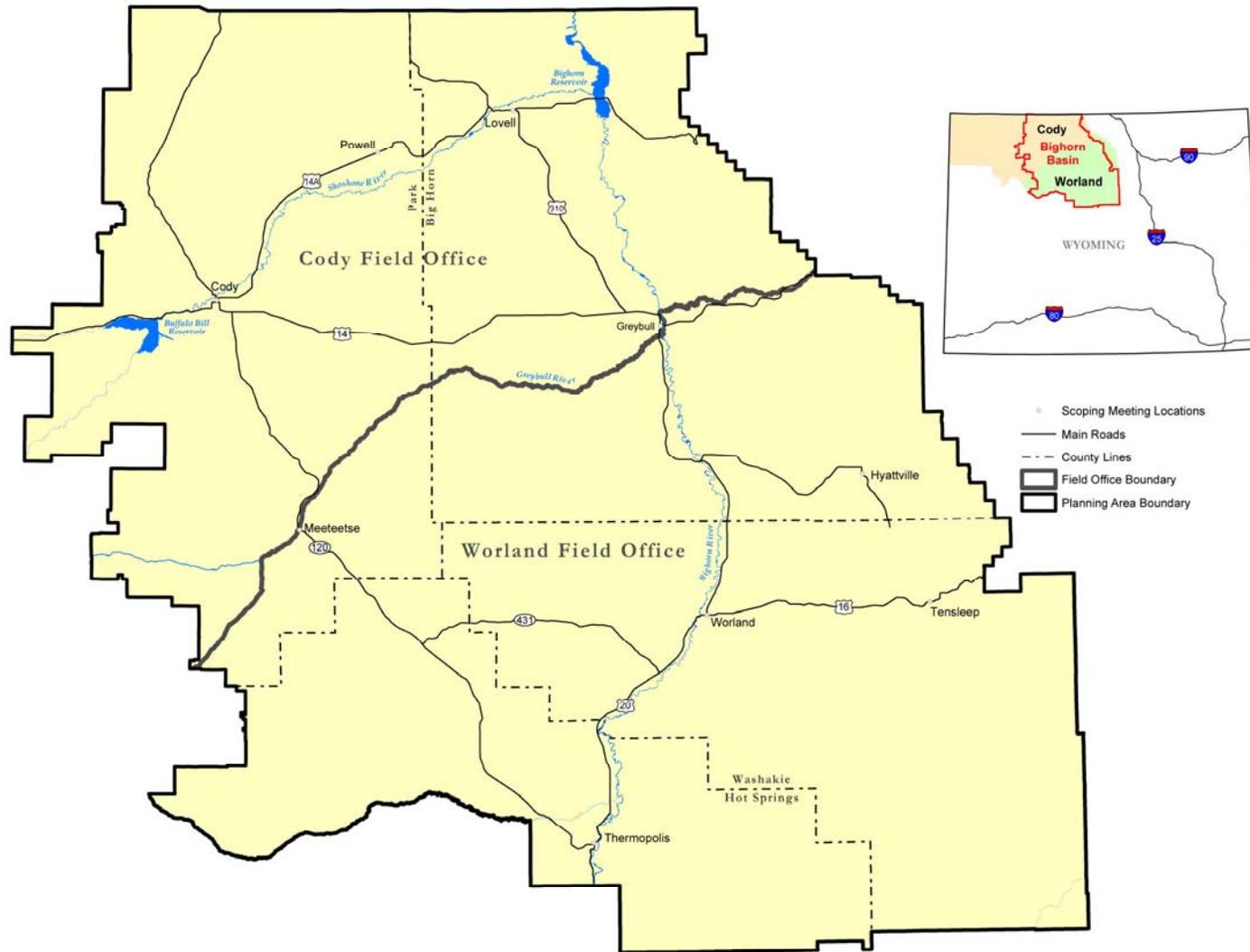


Figure 1. Bighorn Basin Planning Area

considered a major federal action and is subject to the requirements of NEPA. Therefore, the BLM will prepare an EIS that provides a comprehensive evaluation of the environmental issues and impacts. In addition, NEPA requires the BLM to consider a reasonable range of alternatives and to analyze and disclose the potential environmental impacts of those alternatives. In this case, each alternative represents an alternative RMP. The NEPA process also provides opportunities for participation by the public, other federal agencies, state and local governments, and tribal governments during the RMP revision process.

1.1.2 Project and Planning Area Description

The Planning Area covers approximately 5.6 million acres of federal, state, and private land in four counties. Of the total area, approximately 3.1 million acres are BLM-administered surface lands and approximately 4.2 million acres are federal mineral estate (**Table 1**). The CYFO extends west beyond the Bighorn Basin, but these lands and the associated mineral estate are generally managed by the U.S. Forest Service and the National Park Service and will not be considered in detail in the BB RMP Revision Project.

Table 1. BLM-administered Surface Lands and Federal Mineral Estate in the Bighorn Basin Planning Area

County	BLM-administered Surface (acres)			Federal Mineral Estate ¹ (acres)		
	Cody Field Office	Worland Field Office	Total	Cody Field Office	Worland Field Office	Total
Big Horn	565,363	595,243	1,160,606	650,740	641,588	1,292,328
Park	522,578	102,567	625,145	872,071	178,627	1,050,698
Washakie	N/A	918,875	918,875	N/A	1,147,312	1,147,312
Hot Springs	N/A	484,657	484,657	N/A	719,041	719,041

¹ The acreages listed for federal mineral estate do not include Forest Service, Bureau of Reclamation, National Park Service, or other federal lands.

1.1.3 Public Involvement in the Plan Revision

Public involvement, which includes the scoping process, is a vital component of FLPMA and NEPA. Through the public involvement process, the public is able to participate in the planning process. NEPA requirements for public involvement are set forth in CEQ regulations 40 Code of Federal Regulations (CFR) 1500–1508. Additional BLM guidance and direction for public involvement is provided in the BLM Land Use Planning Handbook (BLM Handbook H-1601-1) and the BLM NEPA Handbook (BLM Handbook H-1790-1).

1.2 Scoping Process

The purpose of the public scoping process is to identify issues and planning criteria that should be considered in the RMP and EIS and to initiate public participation in the planning process. The BLM follows the public involvement requirements according to the CEQ regulations set forth in 40 CFR 1501.7, which states, “there should be an early and open process for determining the scope of issues to be addressed and for identifying the process for determining the scope of issues to be addressed during the planning process.” During the scoping process,

the BLM solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then distills the comments to identify the issues, which are called planning issues or significant issues, that need to be addressed during the planning process. The BLM and cooperating agencies consider comments provided during scoping and refine the issues and planning criteria, formulate alternatives, and run impact analyses.

Scoping for the BB RMP Revision Project took place from October 17, 2008 to November 24, 2008. The scoping period was originally scheduled to end November 17, 2008, but was extended due to high levels of public interest and attendance at public scoping meetings. The BLM issued a news release announcing the extension of the scoping period. Under CEQ regulations, the public comment period must last for at least 30 days. Although the formal comment period has ended, the BLM will continue to review all comments received during the RMP process to ensure no key issues or concerns have been missed.

1.2.1 Federal Register Notice of Intent and Preliminary Planning Criteria

The scoping process for the BB RMP Revision Project began with the publication of the NOI (Appendix A) in the Federal Register on October 17, 2008. The BLM posted the NOI on the project website (available via www.wy.blm.gov). The NOI served to notify the public of the BLM's intent to revise the RMP for the Bighorn Basin Planning Area, provide the location of the public scoping meetings, and identify the preliminary issues and preliminary planning criteria to be utilized in the RMP revision process.

Preliminary Planning Criteria

Planning criteria are based on laws and regulations, guidance provided by the BLM Wyoming State Director, results of consultation and coordination with the public, input from other agencies and governmental entities, Native American tribes, analysis of information pertinent to the Planning Area, public input, and professional judgment.

Planning criteria are the constraints or ground rules that are developed to guide and direct the revision of the RMP. The planning criteria serve to: ensure the planning effort is consistent with and incorporates legal requirements; provide for management of all resource uses in the Planning Area; focus on the issues; identify the scope and parameters of the planning effort; inform the public of what to expect from the planning effort; and help ensure the RMP revision process is accomplished efficiently.

The BLM published the preliminary planning criteria in the NOI; the planning criteria below reflect the changes made to these planning criteria by the BLM and cooperating agencies since publication of the NOI.

1. The revised RMP will recognize valid existing rights.
2. Decisions in the revised RMP will comply with all applicable laws and regulations. Decisions will comply, as appropriate, with policy and guidance.
3. Impacts from the management alternatives considered in the revised RMP will be analyzed in an EIS developed in accordance with regulations at 43 CFR 1610 and 40 CFR 1500.

4. The planning process will follow the stages of an EIS-level planning process: conduct scoping, develop a Management Situation Analysis report, formulate alternatives, analyze the alternatives' effects, select a preferred alternative, publish a Draft RMP/EIS, provide a 90-day public comment period for the Draft, prepare and publish a Proposed Plan/Final EIS, provide a 30-day public protest period, and prepare a Record of Decision. For specific information, please see the Land Use Planning Handbook, H-1601-1.
5. Lands covered in the RMP will be public land and split estates managed by BLM. No decisions will be made relative to non-BLM-administered lands.
6. BLM decisions will not apply to private land with private mineral estate, federal lands administered by other federal agencies, or federal mineral estate administered by other federal agencies.
7. The impact analysis will include all lands that may affect, or be affected by, management occurring on BLM-administered public lands in the Planning Area.
8. For program specific guidance of land use planning level decisions, the process will follow the Land Use Planning Manual 1601 and Handbook H-1601-1, Appendix C.
9. The RMP planning effort will be collaborative and multi-jurisdictional in nature. The BLM will strive to ensure that its management decisions are complementary to its planning jurisdictions and adjoining properties within the boundaries described by law and regulation.
10. Broad-based public participation will be an integral part of the planning and EIS process.
11. Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, federal, and tribal agencies as long as the decisions are consistent with the purposes, policies, and programs of federal law, and regulations applicable to public lands.
12. The planning team will work cooperatively and collaboratively with cooperating agencies and all other interested groups, agencies, and individuals.
13. The BLM and cooperating agencies will jointly develop alternatives for resolution of resource management issues and management concerns.
14. The planning process will use the Wyoming BLM Mitigation Guidelines to develop management options and alternatives and analyze their impacts, and as part of the planning criteria for developing the options and alternatives and for determining mitigation requirements.

15. Planning and management direction will be focused on the relative values of resources, not on the combination of uses that will give the greatest economic return or economic output.
16. All proposed management actions will be based upon current scientific information, research and technology, as well as existing inventory and monitoring information.
17. The Standards for Healthy Rangelands and Guidance for Livestock Grazing Management for the Public Lands Administered by the BLM in the State of Wyoming will apply to all activities and uses.
18. The BLM will provide for public safety and welfare relative to fire, hazardous materials, and abandoned mine lands.
19. Visual resource management class designations will be analyzed and modified to reflect present conditions and future needs.
20. The BLM will consider current and potential future uses of the public lands through the development of reasonable foreseeable future development and activity scenarios based on technical analysis of historical, existing, and projected levels of use.
21. Reasonably Foreseeable Action or Activity (RFA) scenarios for all land and resource uses (including minerals) will be developed and portrayed based on historical, existing, and projected levels for all programs. Existing endangered species recovery plans, including plans for reintroduction of endangered and other species, will be considered.
22. The planning process will involve American Indian Tribal governments and will provide strategies for the protection of recognized traditional uses.
23. Planning decisions will comply with the Endangered Species Act and BLM interagency agreements with the U.S. Fish and Wildlife Service.
24. The National Sage-grouse Habitat Conservation Strategy requires that impacts to sagebrush habitat and sagebrush-dependent wildlife species be analyzed and considered in BLM land use planning efforts for public lands with sagebrush habitat in the Planning Area.
25. The relevance and importance criteria for Areas of Critical Environmental Concern (ACEC) designation, found in BLM Manual 1613, were applied to BLM-administered public lands in the Planning Area to identify areas that have the potential for ACEC designation. An ACEC designation alone does not change the allowed uses of public lands involved (FLPMA Section 201(a) and 43 CFR §1601.0-5a). In addition, protective measures for ACECs are not applied or required simply because of the designation. Any protective measures applied to ACECs are based on what is necessary to protect the relevance and importance criteria for which the ACEC was designated. The only

automatic requirement associated with an ACEC designation is that a plan of operations must be submitted for any mining claim development in the area [43 CFR §3809.11(c)(3)].

26. During the preparation of the Analysis of Management Situation (AMS) for this Planning Area, free-flowing streams were evaluated under the criteria established by the Wild and Scenic Rivers Act of 1968 to determine their eligibility and suitability for inclusion in the National Wild and Scenic Rivers System. BLM developed interim management prescriptions for those stream segments passing through public lands deemed eligible and suitable. To provide a clear basis for comparisons, the No Action Alternative will not consider or include any of the stream segments evaluated in association with preparing the AMS for the revision of the RMP.
27. Off-highway vehicle (OHV) use management decisions in the revised RMP will be consistent with the BLM's 2001 National OHV Strategy.
28. Wilderness Study Areas (WSA) will continue to be managed under the Interim Management Policy for Lands under Wilderness Review (IMP) until Congress either designates all or portions of the WSA as wilderness or releases the lands from further wilderness consideration. It is no longer the policy of the BLM to make formal determinations regarding wilderness character, to designate additional WSAs through the RMP process, or to manage any lands other than existing WSAs in accordance with the non-impairment standard prescribed in the IMP.
29. Forest management strategies will be consistent with the Healthy Forests Restoration Act.
30. Fire management strategies will be consistent with the May 2004 Fire Management Plan for Wyoming Northern Zone.
31. Geographic Information Systems (GIS) and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed.
32. The RMP will include adaptive management criteria and protocol to deal with future issues.

1.2.2 Public Notification of Scoping

News Release

The BLM issued a news release (Appendix D) to local media on October 14, 2008, describing the upcoming NOI and listing the time, date, and location of the public scoping meetings. Copies of the news release went out to numerous radio stations and newspapers within and outside the

Planning Area (see **Table 2**). The news release was also posted on the BB RMP Revision Project website.

Table 2. Media Distribution List for Media Release

Media Outlet	Region
Newspapers	
Northern Wyoming Daily News	Worland, WY
Independent Record	Thermopolis, WY
Greybull Standard Tribune	Greybull, WY
Basin Republican Rustler	Basin, WY
Cody Enterprise	Cody, WY
Powell Tribune	Powell, WY
Lovell Chronicle	Lovell, WY
Billings Gazette	Billings, MT
Wyoming Livestock Roundup	Casper, WY
Associated Press	Billings, MT
Casper Star Tribune	Casper, WY
Wyoming Conservation Alliance	Cheyenne, WY
Riverton Ranger	Riverton, WY
Radio	
Big Horn Radio Network: KODI/KZMQ/KTAG/KKLX/KWOR	Cody AM and FM
KPOW/KLZY	Powell AM and FM
KTHE	Thermopolis AM
KWOR/KKLX	Worland AM and FM
KVOW/KTAK	Riverton AM and FM

Post Card

Another means of outreach prior to the public scoping meetings included a postcard mailing announcing the scoping meetings. The BLM mailed the post cards to cooperating agencies, individuals and organizations on the project mailing list (see the following section, Scoping Meetings), as well as P.O. Box holders in the Planning Area. The BLM mailed 2,679 postcards on October 21, 2008, and more than 2,500 were successfully delivered. The postcard is included in Appendix C.

Additional Sources of Public Information about the Scoping Process

In addition to news releases and other notifications from the BLM regarding the scoping process, some members of the public received notification from other sources. More than 15 articles and news bulletins regarding some aspect of the RMP process have been published in newspapers, both within and outside the Planning Area (Appendix D). Many of the articles listed the dates for the scoping period and the dates, times, and locations of public scoping meetings. Most of the articles provided some background regarding the purpose of the RMP revision and information about the process. The County Commissioners for the counties within the Planning Area, all of whom are cooperating agencies, also contacted county residents and

interest groups. The County Commissioners from Park County used an automated phone system, emails, and radio to contact thousands of county residents and invite them to attend the public meetings and participate in the scoping process. Big Horn, Washakie, and Hot Springs Counties performed similar outreach efforts including contacting country residents, posting flyers, and taking part in radio outreach.

Website

On October 17, 2008 the BB RMP Revision website came online. The website provides background information on the project, a description of the scoping process and meeting locations, instructions on how to submit comments, a map of the Planning Area, and copies of public information documents such as the NOI and the Preparation Plan. The website is one of the methods used to communicate project news and updates to the public. The website can be accessed at www.wy.blm.gov.

1.2.3 Scoping Meetings

The BLM hosted six scoping meetings to provide the public with an opportunity to learn and ask questions about the project and the planning process and to submit their issues and concerns to the BLM. As previously described, the times and locations of public scoping meetings were advertised to the public using a variety of outreach methods.

During the weeks of November 3, 2008 and November 10, 2008, the BLM hosted scoping meetings in six locations across the Planning Area. All meetings ran from 3:00 p.m. until 8:00 p.m. **Table 3** lists the scoping meeting locations, dates, and the number of people in attendance. The BLM chose an open house format over a more formal public meeting format to encourage broader participation, to allow attendees to learn about the project at their own pace, and to enable attendees to ask questions of BLM representatives in an informal one-on-one setting.

The November 13, 2008 meeting, scheduled for the America's Best Value Inn in Powell, Wyoming was moved to a larger space at the Park County Fairgrounds. The BLM changed the location because of high turnout at previous meetings and concerns regarding the original room's compliance with the Americans with Disabilities Act. To inform the public of the location change, the BLM contacted six local radio stations and submitted public service announcements, placed a notice describing the location change on the project website, posted a large sign with directions to the new meeting space on the door to the original meeting space and in the hotel's lobby, and placed explanatory flyers with directions in dozens of businesses and public buildings in the town of Powell. In addition, a project team member was posted at the original meeting location in a vehicle marked with a sign reading "BLM Public Meeting Information" to answer questions and distribute flyers with directions to the new meeting location. A member of the project team was stationed at the original meeting space from 30 minutes before the scheduled start of the meeting until 8:00 p.m. The Powell scoping meeting change of location flyer is included in Appendix C.

Table 3. Schedule of Public Scoping Meetings

Date and Time	Location	Number of Attendees
Wednesday, November 5, 2008 3:00 p.m. – 8:00 p.m.	Holiday Inn, Conference Room 115 East Park Street Thermopolis, WY 82443	33
Thursday, November 6, 2008 3:00 p.m. – 8:00 p.m.	Community Center, Conference Room 1200 Culbertson Avenue Worland, WY 82401	42
Friday, November 7, 2008 3:00 p.m. – 8:00 p.m.	Big Horn Federal Savings Bank, The Paint Brush Room 33 North 6 th Street Greybull, WY 82426	26
Wednesday, November 12, 2008 3:00 p.m. – 8:00 p.m.	Big Horn Federal Savings Bank, Community Room 1701 Stampede Avenue Cody, WY 82414	163
Thursday, November 13, 2008 3:00 p.m. – 8:00 p.m.	Park County Fairgrounds, General Exhibit Hall ¹ 655 E 5th Street Powell, WY 82435	73
Friday, November 14, 2008 3:00 p.m. – 8:00 p.m.	Lovell Community Center 1925 US Hwy 310 Lovell, WY 82431	44

¹This public meeting was originally scheduled to occur at the America’s Best Value Inn Conference Room 777 East 2nd Street, Powell, WY 82435.

In addition to members of the BLM interdisciplinary team, a total of 381 people attended the scoping meetings. The BLM provided four handouts (Appendix C) and a series of four display boards at each scoping meeting (Appendix C). BLM resource specialists also brought maps, photographs, pamphlets, and other visual aids to the meetings for use when speaking with the public.

The BLM encouraged meeting attendees to comment by submitting written comment forms (either at the meetings or via mail) or by sending an email. Comment sheets were available to attendees at all meetings (Appendix B), as was a computer station where the public could type and submit their comments.

Meeting Handouts

The BLM distributed four meeting handouts (Appendix C) to all people attending the six scoping meetings. The handouts provided the following:

- A description of the scoping meeting and guidelines for submitting comments.
- An explanation of the NEPA process and a brief project description.
- A preliminary list of issues and concerns for consideration in the RMP revision.
- A comment sheet containing conventional mail and email addresses for submitting comments.

Attendees to the November 14th public meeting received a notification of the extension of the scoping period until November 24, 2008 (Appendix C). At the November 12th through November 14th meetings, attendees also received a survey from the County Commissioners.

Displays

Four, three-panel tabletop display boards (Appendix C) guided meeting participants visually through the EIS process, action, and issues. The first display board contained a summary of the NEPA process, a flowchart of the EIS timeline, potential resource areas to analyze, and a general project description. The remaining three boards contained explanations of the current status and potential issues related to recreation, wildlife, and mineral resources in the Planning Area.

Project Mailing List

The BLM compiled a list of 158 individuals, agencies, and organizations that participated in past BLM projects or requested to be on the general mailing list. The BLM mailed the initial postcard (previously described) to each individual on this list. In addition to those on the general mailing list, the BLM purchased a mailing list covering the entire Bighorn Basin (over 16,000 addresses) and mailed postcards to P.O. Box addresses included in this basin-wide list (2,485 addresses). Visitors to the scoping meetings were asked to sign in and provide their mailing address so that they could also be added to the mailing list. Other additions to the mailing list include those individuals who have submitted requests to be added to the list. Duplicate entries, changes of address, and return-to-sender mailings are deleted from the official project mailing list as they are identified. Through this process, the general mailing list was revised to approximately 230 entries. Requests to be added to or to remain on the official mailing list will continue to be accepted throughout the planning process.

1.3 Collaborative Involvement Process

1.3.1 Cooperating Agencies

A cooperating agency is any federal, state, or local government agency or native American tribe that enters into a formal agreement with the lead federal agency to help develop an environmental analysis. More specifically, it is stated in the BLM Land Use Planning Handbook (H-1601-1) that cooperating agencies “work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks.”

The benefits of enhanced collaboration among agencies in preparing NEPA analyses include disclosing relevant information early in the analytical process; applying available technical expertise and staff support; avoiding duplication with other federal, state, tribal, and local procedures; and establishing a mechanism for addressing intergovernmental issues.

The BLM invited local, state, federal, and tribal representatives to participate as cooperating agencies on the BB RMP Revision Project. As of December 15, 2008, the following agencies have all been contacted regarding cooperating agency status, and most have signed a Memorandum of Understanding.

Counties

- Big Horn County Commission
- Hot Springs County Commission
- Park County Commission
- Washakie County Commission

Conservation Districts

- Cody Conservation District
- Hot Springs Conservation District
- Powell-Clarks Fork Conservation District
- Meeteetse Conservation District
- Shoshone Conservation District
- South Big Horn Conservation District
- Washakie County Conservation District

Wyoming State Agencies

- Office of the Governor
- Department of Agriculture
- Department of Environmental Quality
- Game and Fish Department
- Office of Lands and Investments
- Oil and Gas Conservation Commission
- State Engineer's Office
- State Geological Survey
- State Historic Preservation Office

Federal Agencies

- U.S. Environmental Protection Agency (EPA), Region 8
- U.S. Forest Service – Shoshone National Forest/Wapati Ranger District
- U.S. Forest Service – Bighorn Ranger District

Tribes

- Northern Cheyenne Tribe Tribal Historic Preservation Office
- Crow
- Rosebud Sioux

As of December 2008, the BLM has conducted four meetings with the cooperating agencies. Cooperating agencies were also encouraged to attend the scoping meetings and provide comments as part of the scoping process. Cooperating agencies will be engaged throughout the process, including during alternatives development. Meetings held to date include:

- Planning Concepts and Planning Nuts and Bolts (Spring 2008)
- Project Kickoff held in Greybull, Wyoming (October 8, 2008)
- BLM's Cooperating Agency Training held in Worland, Wyoming (October 15th and 16th 2008)
- Socioeconomic Workshop held in Worland, Wyoming (October 15, 2008)
- Collaboration and Outreach Meeting held in Worland, Wyoming and via teleconference (October 31, 2008)

1.3.2 Consultation with Tribes

The BLM has formally initiated its consultation with tribal governments. Government-to-government consultation with the tribes will continue throughout the RMP process. The following 11 tribes were sent letters on October 10, 2008 requesting consultation:

- Blackfeet
- Cheyenne River Sioux
- Crow
- Eastern Shoshone
- Nez Perce
- Northern Arapahoe
- Northern Cheyenne
- Oglala Sioux
- Rosebud Sioux
- Salish & Kootenai
- Shoshone Bannock

On December 17, 2008 the BLM met with tribal representatives in Rapid City, South Dakota to discuss the RMP revision.

2.0 COMMENT SUMMARY

2.1 Comment Collection

The official scoping period ended on November 24, 2008, and all comments postmarked by that date are included in this report. The issues identified in this report will be considered in alternative formulation and the effects analysis. All comments received during the RMP process will be reviewed to ensure no key issues or concerns have been missed.

The BLM received a total of 291 unique written comment documents and 3,076 form letters (2,976 via e-mail and 100 via standard mail). Comments were delivered in person, submitted via email, or mailed to the field offices. A list of commenters is included in Appendix E. All unique comment letters, each form letter containing additional unique material, and an example of all of the form letters can be viewed in Appendix F. The most commonly used method of comment submission was e-mail. The method of comment submission for all comments received is shown in **Table 4**.

Table 4. Number of Comments Received by Document Type

Comment Document Format	Number of Comment Documents
Standard Mail	195 (Including 100 form letters)
E-mail	3,133 (including 2,976 form letters)
Public Scoping Meetings ²	39
Total Comment Documents Received During Scoping ¹ :	3,367

¹Includes the 3,076 form letters received during the scoping period.

²Includes comments entered via the computer at the scoping meetings and the scoping meeting comment form.

The complete list of the comment documents by commenter, organization, and date of submittal is provided in Appendix E; this information can be used to locate specific comment documents in Appendix F. The scoping comment documents resulted in approximately 1,060 separate comments; most comment documents contained multiple comments.

Comment documents were tracked upon receipt to assure all relevant comments were captured. First, comment documents were logged, given a unique identifier (referred to as a document number), and scanned into an electronic file. Individual comments from within each comment document were then identified. Finally, issues and concerns within the comment excerpts were placed into an issue category based on the topic of the comment. To assist with the analysis, the BLM entered comments into a spreadsheet and organized them by planning issue categories, geographical location of the commenter, and affiliation of the commenter.

2.2 Summary of Public Comments

2.2.1 Submissions by Affiliation

Table 5 shows the affiliation of each entity that submitted comments during the scoping period. Individuals who did not identify an affiliation provided the largest number of total comment documents, submitting 3,295 comment documents during the scoping period. No comments

were received from tribal governments. A list of all commenters and their affiliations can be viewed in Appendix E.

Table 5. Number of Comment Documents by Affiliation

Commenter Affiliation	Number of Comment Documents
No Affiliation Indicated	3,295 (3,069 form letters)
Federal Agency	3
State Agency	3
County Government	7
City Government	2
County Conservation District	4
Elected Official	1
Private Organization	34 (7 form letters)
Business	18
Tribal Government	0
Total	3,367 ¹

¹Includes the 3,076 form letters received during the scoping period.

2.2.2 Submissions by Geographical Area

Table 6 shows the number of submissions received from locations in and out of the Planning Area. Comments from residents within the Planning Area were submitted primarily by individuals and those who did not identify an affiliation. Only those commenters who supplied their address are included, and therefore, the totals shown here do not match the total number of comments received.

Table 6. Number of Comment Documents Received by Geographic Location

City and State	Zip Code	Number of Comment Documents
Locations Within the Planning Area		
Worland, WY	82401	13
Basin, WY	82410	8
Burlington, WY	82411	0
Cody, WY	82414	76
Deaver, WY	82421	0
Greybull, WY	82426	9
Hyattville, WY	82428	1
Lovell, WY	82431	11
Manderson, WY	82432	1
Meeteetse, WY	82433	5
Otto, WY	82434	0

Table 6. Number of Comment Documents Received by Geographic Location

City and State	Zip Code	Number of Comment Documents
Powell, WY	82435	38
Shell, WY	82441	2
Ten Sleep, WY	82442	2
Thermopolis, WY	82443	8
Ralston, WY	82440	1
Cowley, WY	82420	2
Emblem, WY	82422	1
Wapiti, WY	82450	1
Locations Outside the Planning Area- Other Areas in Wyoming		
City and State	Number of Comment Documents	
Big Horn, WY	1	
Casper, WY	11	
Cheyenne, WY	12	
Dayton, WY	1	
Douglas, WY	1	
Gillette, WY	4	
Jackson, WY	2	
Lander, WY	7	
Laramie, WY	10	
Moran, WY	1	
Ranchester, WY	1	
Rock Springs, WY	1	
Sheridan, WY	6	
Locations Outside the Planning Area- Outside of Wyoming		
State	Number of Comment Documents	
Arizona	1	
California	9	
Colorado	6	
District of Columbia	1	
Georgia	1	
Idaho	1	
Maryland	4	
Massachusetts	1	
Michigan	2	
Minnesota	8	
Missouri	1	
Montana	7	
New Mexico	2	

Table 6. Number of Comment Documents Received by Geographic Location

State	Number of Comment Documents
New York	1
North Carolina	1
North Dakota	1
Oklahoma	3
Oregon	1
South Dakota	2
Utah	3
Washington	5
Wisconsin	3

2.2.3 Comments by Planning Issue Category

The BLM received a total of 1,060 unique comments related to RMP planning issues. In addition, the BLM received a number of comments on topics that will not be addressed in the RMP, including: requests for changes to regulations and policies, issues outside the scope of the planning process, comments that were too vague, and comments on how the planning or public involvement process should work. Comments that will not be addressed in the RMP are discussed in greater detail in Section 3.4. The 1,060 comments were categorized into 15 planning issue categories. **Table 7** shows the number of comments received for each planning issue. For form letters, the BLM bracketed all comments from a single form letter the BLM selected to represent that particular form letter, known as a “Master Form Letter”, but did not bracket identical comments that appeared in subsequent submittals of that same form letter. If subsequent form letters contained additional, unique comments that did not appear in the “Master Form Letter”, these comments were bracketed and are represented in the comment counts shown in **Table 7**. Section 3.3, provides a basic summary of the unique comments received for each category. Full comment documents are available in Appendix F.

The comment count by planning issue category in **Table 7** provides an estimate for the number of comments received for each topic. However, because of the unstructured nature of the comment process (i.e., commenters were not answering specific questions but rather speaking to their concerns), the BLM often received comments that touched on multiple issue categories. In these cases, the comment was placed into the category where it seemed most appropriate. It is important to note that while comments of this type were not coded into multiple categories, the issue statements in Section 3.2 do represent all of the comments relevant to that planning topic, regardless of the issue category where the comment was grouped.

Table 7. Number of Individual Comments by Planning Issue Category

Planning Issue Category	Number of Individual Comments
Climate Change	9
Watershed and Air Management	68
Energy and Minerals Management	237
Fire and Fuels Management	28
Invasive and/or Noxious Species	31
Fish, Wildlife, and Special Status Species	153
Wild Horses	47
Cultural and Paleontological Resources	66
Visual Resources	27
Lands and Realty	55
Comprehensive Trails and Travel Management, and OHV	121
Recreation and Visitor Use	30
Livestock Grazing	78
Special Designation Management	74
Socioeconomic Resources	36
Total	1,060

3.0 ISSUE SUMMARY

Issue identification is the first step in the RMP planning process. Planning issues are controversies or concerns about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues may include public concerns or needs to be considered in the planning process. Planning issues may result from changed circumstances from the previous planning process or new data that was previously unavailable.

3.1 Planning Issue Development

The BLM used a multi-step process to categorize and distill the issues identified in the RMP scoping comments:

1. Comments were bracketed and reviewed for content.
2. Comments were assigned to a resource category based on the topic of the comment. These resource categories include resource-specific topics such as water quality, wildlife habitat, special status species management, soil, fire management, and others.

3. Related resource categories were then collapsed into broader issue categories. For example, the resource categories of wildlife habitat and special status species management were collapsed into the issue category Fish, Wildlife, and Special Status Species.
4. Planning issue statements were written to encapsulate the issues raised by the comments in each issue category.

The planning issue statements are presented in section 3.2 and are designed to highlight the key issues as described in comments received during the scoping process. Because they are meant to encapsulate the issues and concerns raised by the public, as well as the cooperating agencies and the BLM during preliminary and internal scoping, each of the broad planning issue statements incorporates a number of closely related, but more specific, RMP-related issues. A more detailed look at individual issues and their relationship to the planning issue statements is provided in section 6 of this document.

3.2 Issues Identified During Scoping

A planning issue statement (written in the form of a question) has been developed for each of the 15 planning issue categories that arose out of the scoping process. These planning issue statements encapsulate the issues and concerns raised by the public during the scoping process. Adjustments to the planning issues will continue to be made as needed during the planning process as the BLM receives additional input from the public and cooperators. The 15 planning issue statements are identified below for each of the planning issue categories.

Climate Change

- How can the BLM incorporate climate change into its land management practices?

Watershed and Air Management

- How can the BLM manage use of public lands while protecting watershed and air quality?

Energy and Minerals Management

- Which areas should be open to mineral and energy development, and how should BLM manage such development while protecting human health as well as natural and cultural resources?

Fire and Fuels Management

- How can the BLM manage fire and fuels to protect public safety as well as natural and cultural resources?

Invasive and/or Noxious Species

- How can the BLM manage the spread of and mitigate impacts associated with invasive species and/or noxious weeds?

Fish, Wildlife, and Special Status Species

- How can the BLM manage public land use while maintaining and improving terrestrial and aquatic habitats?

Wild Horses

- How can the BLM manage wild horses on public lands while also protecting natural and cultural resources?

Cultural and Paleontological Resources

- How can the BLM manage paleontological, cultural, and traditional resources to provide both resource protection and opportunities for public education and study?

Visual Resources

- How can the BLM manage public lands for visual qualities?

Lands and Realty

- What land tenure and management adjustments are needed to meet access and development needs, while also protecting natural and cultural resources?

Comprehensive Trails and Travel Management, and OHV

- How can the BLM manage travel on public lands?

Recreation and Visitor Use

- How can the BLM provide recreational opportunities on public lands while protecting public safety, and natural and cultural resources?

Livestock Grazing

- How can the BLM manage livestock use on public lands while also protecting natural and cultural resources?

Special Designation Management

- How can the BLM manage areas that contain unique or sensitive resources?

Socioeconomic Resources

- How can the BLM manage public land use with the preservation of local tradition and local economies that rely upon BLM-administered land?

3.3 Summaries of Public Comments by Planning Issue Category

This section provides summaries of the public comments received during the public scoping process for each planning issue category. As discussed previously, the BLM received and reviewed approximately 3,367 comments (291 unique comment letters and form letters with unique information and 3,076 identical form letters) during the scoping period. In the issue category summaries below, the BLM has attempted to capture the primary needs, uses, and concerns presented in these comments. With the exception of form letters, all written submissions have been reproduced in their entirety in Appendix F.

Climate Change

The BLM received nine comments related to climate change. Several commenters questioned climate change or the ability to predict the result of such change. One commenter saw it as a strategy to limit development in the Planning Area, while another stated addressing greenhouse gas emissions should be a secondary concern for the BLM behind managing for multiple use and sustained yield, and the socioeconomic stability of local communities. A commenter asked the BLM to not characterize livestock as major sources of greenhouse gasses. Several other commenters requested the BLM incorporate climate change and greenhouse gas reduction policies into the RMP revision, and another asked for a cumulative impacts analysis. One commenter asked that the BLM proactively identify areas that could serve as refuges for certain species, based on projected changes in climate, and protect those areas. Another commenter suggested that the RMP assess various models for future climate change and environmental issues.

Watershed and Air Management

The BLM received 68 comments concerning the management of watersheds and air quality in the Planning Area.

Wetland/Riparian Areas

Commenters requested that wetlands and riparian areas be protected from roads, trails, vehicle travel, pollutants, incompatible grazing practices, industry, and mineral extraction, while the BLM continues to monitor riparian area function. One commenter asked that the BLM reduce stream and stormwater runoff, as well as sedimentation impacts in the higher reaches of watersheds to protect downstream users. Concerns were raised about sedimentation in the Bighorn Lake, which could impact fisheries, recreation, and other resources. Commenters asked that the RMP address non-point source pollution, such as removed groundcover, roads and road crossings, irrigation diversion, and other surface-disturbing activities. Commenters also asked the BLM to reassess grazing allotments that contain riparian areas functioning at risk or that are non-functioning to address existing grazing strategies or to set new protection measures. Another commenter stated that riparian areas with high biological concern should be managed to achieve Proper Functioning Condition. Additionally, it was requested that the BLM maintain water flow through riparian areas.

Many commenters requested that the BLM protect wetlands and wetland functions within the Planning Area. A commenter requested the RMP state how the BLM would identify, avoid, or mitigate wetlands in the Planning Area for varying types of surface land and mineral estate ownership situations. The commenter also asked the BLM to adopt and require a series of mitigation and avoidance measures for wetlands and riparian areas. One commenter asked that future structures be allowed only on BLM-administered land if they do not adversely impact wetland functions and another commenter recommended wetland protection through closing certain lands to leasing or the use of No Surface Occupancy (NSO) stipulations.

Water Quality

Commenters suggested that the RMP revision should discuss the existing conditions in the perennial streams and associated riparian zones within the Planning Area, compare them to the conditions from the former RMP, and outline continuing restoration plans. Commenters asked that the analysis identify the proportion of water quality impairment due to natural processes versus BLM management practices, disclose the impact of cumulative effects on water quality parameters, and discuss ways to comply with applicable standards. To protect fisheries, commenters asked the BLM to consider bank stabilization, riparian buffers in agricultural areas, erosion control, produced water management, and other best management practices for streams.

Commenters asked that the BLM protect groundwater, drinking water, and irrigation water from contamination, particularly related to oil and gas activity, and maintain groundwater availability. These comments asked that water resources be protected from contamination or substantial hydrologic changes by industrial activities. A commenter asked that mitigation outside of BLM jurisdiction be identified to protect water quality. The commenter also recommended NSO lease stipulations and best management practices or mitigation to protect drinking water.

Some commenters asked the BLM to protect water quality and identify priority areas for water source development, avoidance, or rehabilitation. One commenter requested the Absaroka Front headwaters of Owl Creek, Cottonwood Creek, Grass Creek, tributaries of Greybull River, Dry Creek, and Gooseberry Creek be made off-limits to new industrialization in order to protect water quality. Multiple commenters supported construction of new reservoirs on BLM-administered land, such as Nowood River dam and various Wyoming Water Development Commission projects, to provide additional watering opportunities for livestock and wildlife and to increase recreation and tourism opportunities. One commenter suggested that the BLM develop more detention ponds to limit erosion and increase water availability. Another commenter stated that the BLM should not permit activities that could affect stream flow or retard flooding, while others requested rigorous standards for future water diversion to preserve flow rates for aquatic species.

Air Quality

Multiple commenters expressed concern about air quality, or the deterioration of air quality, in the Planning Area as a result of activities on BLM-administered lands. Several comments related to the adverse effects of oil and gas development on air quality. There were many comments that suggested the BLM should take a more proactive approach to managing air quality by gathering baseline air quality data, increasing air quality monitoring, setting aggressive standards, and halting activities that have caused standards to be exceeded. One commenter requested the baseline air quality data be incorporated into the RMP prior to any type of development activity. Ozone was of particular concern to many commenters who requested the BLM take steps to reduce the risk of ozone in the Planning Area. One commenter suggested the BLM restrict certain activities during wind or storms to mitigate dust.

Energy and Minerals Management

The BLM received 237 comments related to energy and minerals management. The majority of these comments were on the topic of oil and gas development, with fewer comments on the topics of mineral leasing, mining, renewable energy, and geothermal development.

Energy and Mineral Production

The BLM received a number of comments supportive of mineral and energy development in the Planning Area, often requesting no additional or reduced restrictions on mining activities and practices. These comments cited the need for increased energy independence, developer's track records on environmental issues in existing use areas, and the economic benefits of extractive uses. Several commenters also requested streamlining the leasing process, while another requested greater transparency in the permitting process. One commenter requested BLM evaluate the impacts of surface management constraints on the availability of lands for subsurface activities.

The BLM received comments expressing opposition to mineral extraction and oil and gas development, or requesting additional restrictions be placed on these activities. Some commenters requested some special areas be off limits to development, or subject to timing or NSO requirements. Some of these commenters expressed concern over activities in or near specially designated management areas (such as the McCullough Peaks Area, WSAs, and ACECs), while others were concerned about drilling near sage-grouse and other crucial wildlife habitat. Multiple commenters expressed general disapproval of development due to resource impacts, or supported phased leasing of lands in the Bighorn Basin or restriction of these activities to a few appropriate areas. Other commenters urged the BLM to require that oil and gas procedures include specific techniques and technologies to limit potential environmental impacts, including but not limited to: reinjection of produced water, directional drilling, reduced/modified drilling pads, clustered wells, limited road construction, impervious secondary containment around facilities, protection against hydraulic fracturing impacts on groundwater, and visual impact mitigation measures. Several requests for public notification of the composition of chemicals (particularly fracturing fluid) used in drilling and of oil and gas leases were also made.

The potential for adverse impacts on human health and aesthetics from air pollution and hazardous materials were also mentioned; commenters requested the BLM require Health Impact Assessments and air dispersion modeling for oil and gas development and set emissions standards. A commenter requested the BLM perform air quality modeling and disclose any direct and cumulative impacts, including the potential for National Ambient Air Quality Standard violations. Several commenters also requested restrictions on hazardous materials disposal.

Many commenters supported the imposition of additional remediation, monitoring, mitigation and reclamation requirements on developers. Comments of this type included requests for stronger spill cleanup/enforcement and bonding requirements for developers. These comments also requested that development activities protect or mitigate impacts on recreation, cultural resources, paleontological resources, livestock grazing, wildlife, habitat

loss/connectivity, soil resources, visual resources, and human health. One commenter highlighted BLM's successful reclamation of abandoned gypsum and bentonite mines in the Planning Area. Finally, the BLM received comments suggesting Best Management Practices be required for mineral and oil and gas development or that industry standards for resources such as air quality be imposed.

The BLM received comments that were not overtly in favor of or opposed to mineral resource development or additional restrictions on these activities. Some comments expressed support for some resource development, but stipulated that the BLM should also insist on protecting soil, water, air, noise, wildlife, and other resources. One commenter requested a list of possible mitigation measures be published in the revised RMP and another requested EISs be produced for oil and gas leasing activities.

Several comments requested the BLM analyze the potential for renewable energy production (from wind or solar) as well as any associated impacts on visual, wildlife, or other resources and uses. One commenter expressed concern over geothermal leasing, and another noted the potential visual impacts and other impacts on private landowners.

Management of Produced Water

Use and disposal of produced water from oil and gas extraction was identified as an issue by commenters. Some commenters supported the use of produced water from oil and gas development to meet other resource needs (e.g., livestock and wildlife water, riparian habitat, and in stream flow maintenance). Several commenters requested the BLM allow the disposal of produced water on BLM-administered lands to limit its disposal on private land; others asked that the BLM not allow dumping of produced water onto the ground and in waterways. Multiple commenters requested produced water from Coalbed Natural Gas (CBNG) development be re-injected to avoid surface water impacts. Additionally, one commenter requested that BLM coordinate with county officials for all CBNG water issues.

Fire and Fuels Management

The BLM received 28 comments related to fires and fuels management. Multiple commenters noted the importance of controlling fuel levels on public lands and using prescribed fire. Several commenters supported the use of prescribed fire to maintain an appropriate mosaic of vegetative age-classes and composition types across the Planning Area. Several commenters supported fire as a tool to remove junipers. Another commenter stated that they were in favor of controlling invasive species with prescribed fire, but not its use to alter vegetative communities and maintain areas as rangeland. Commenters described fire as having a beneficial role in habitat regeneration and the prevention of fuel accumulation. One commenter requested that areas where prescribed fire was used be managed to minimize erosion, and another recommended curtailing grazing for a certain period of time post burn.

Multiple commenters recommended the use of timber stand removal or thinning to reduce the accumulation of fuels in the form of dead and dying trees; several other commenters disagreed with this practice. A few commenters, noting the decline in logging and grazing in the Planning Area, requested that other methods of fuel control be investigated to replace these activities. Another commenter disagreed with the use of vegetation management activities in remote

areas where fire was unlikely to cause problems for people and requested that any thinning that did occur was appropriate and left no long-lasting impacts, such as new roads.

One comment mentioned the need for a programmatic fire plan to maintain and enhance vegetative communities. Several comments supported coordination between the BLM and other agencies/organizations regarding fire plans. Citing the cost of the 2008 Gun Barrel Fire, one commenter questioned the price per acre of BLM fire suppression costs versus the value of the resources protected.

Invasive and/or Noxious Species

The BLM received 31 comments related to invasive species. Multiple comments requested BLM place more emphasis on invasive species management. Several comments mentioned the influence of surface-disturbing activities, such as OHV use and mining, and other land use, such as grazing, in the spread of invasive species. The need for an aggressive plan for the control of noxious weeds and invasive species was also frequently discussed. Commenters suggested the plan contain a combination of prevention and control methods, including: mechanical, chemical, biological, livestock grazing, prescribed fire, rapid reseeding of disturbed areas, and weed-free livestock feed. Along with the previously mentioned strategies, a comment suggested BLM manage cheatgrass by planting appropriate nonnative species capable of out-competing the grass. One comment stated that the control method selected should be cost effective, and another requested that BLM develop plans to effectively control pests and disease in forested areas.

Areas mentioned as in need of efforts to control invasive species included riparian areas, rangelands, and sage-grouse habitat. Plant species described as invasive, noxious, or non-native in comments included Canada thistle, cheatgrass, foxtail, halogeton, hoary cress, knapweed, tamarisk, Russian olive, and Russian thistle.

Fish, Wildlife, and Special Status Species

The BLM received 153 comments concerning the management of biological resources, including wildlife, fish, vegetation, and special status species. Commenters requested that the BLM protect wildlife habitat from energy overdevelopment, grazing allotment pressure, forestry practices, soil erosion from vehicle use, fragmentation, and road construction and proliferation. Another commenter requested that BLM balance livestock/wildlife needs. Several commenters specifically requested the front range of the Absaroka Mountains, Beartooth Mountains, and Big Horn Mountains be preserved as critical wildlife habitat and protected from development. A commenter asked for a health impact assessment for wildlife and habitat and another noted that air quality was important to wildlife. A commenter asked the BLM to define “habitat” to better assess impacts of multiple use and to aid in mitigation efforts, while another requested the BLM adopt an Ecosystems Management approach to protect all species across the landscape. One commenter was concerned about potentially transferable diseases and pests carried by wildlife. Multiple commenters urged cooperation between the BLM and other federal and state agencies on wildlife, special status species, and habitat issues, and some requested mitigation measure be developed.

Wildlife and Fish

The BLM received multiple comments related to wildlife and fish habitat and management. Regarding big game, commenters asked the BLM to consider making winter ranges off-limits for development activities and to not allow the removal of habitat stipulations put on existing energy development projects. Additionally, several commenters suggested that adequate levels of annual forage be left to support wildlife. There were many comments about protecting wildlife habitat and nesting sites in specific areas including the Clark's Fork area, Heart Mountain, and on the islands in the river south of Thermopolis. Fox Mountain, Webber Canyon, Sheep Mountain, Dorsey Creek, Tatman Mountain, Paint Creek, Newmeyer Creek, and Dry Creek drainages were also mentioned as wildlife habitat areas worthy of protection. Others requested that spatial habitat buffers only apply to occupied crucial habitats and not to potential habitat areas. One commenter asked the BLM to balance the needs of wildlife and livestock to protect Wyoming's culture and its environmental resources, including an assessment of habitat fragmentation and migration route disruption, and another stated that all fences should meet Wyoming Game and Fish Department standards. One commenter suggested that the BLM create wildlife enhancement areas for public use and enjoyment and mentioned the Horse Pasture north of Worland as an ideal area. The inclusion of a comprehensive strategy for aquatic habitat monitoring and management was requested for the RMP revision. Several invasive or non-native aquatic species or diseases were mentioned as issues in the planning area; these included whirling disease, New Zealand mud snails, and non-native fish species.

Commenters also asked the BLM to protect native amphibian habitat and address bird and bat powerline electrocutions. Other commenters requested habitat buffers for raptor nesting areas and prey species protection. One comment noted that the BLM should address soil erosion impacts on fish populations in the Planning Area, and another requested minimal flow levels for trout be maintained.

Sage-grouse and Special Status Species

The majority of comments on special status animal and plant species dealt with requests to protect and enhance habitat for individual species, as well as requests to monitor various special status species. One commenter requested that all species management decisions be based on data and latest science. Species identified included Ute ladies'-tresses, yellow-billed cuckoo, swift fox, Yellowstone cutthroat trout, black-footed ferret, grey wolf, grizzly bear, and lynx. Many comments also requested protection for prairie dog colonies to support various predators. Several other comments requested BLM do monitoring, mapping, and baseline assessments for all special status species. One commenter appeared to question the sensitivity of special status species to grazing and oil and gas development. Additionally, a commenter asked BLM to consider impacts of predators on private landowners and health impacts from bison on livestock.

Commenters broadly agreed that the BLM should take a proactive role in protecting the sage-grouse so that it does not become listed as a threatened or endangered species. Commenters requested that the BLM continue to maintain and enhance sage-grouse habitats and populations within the Planning Area. A commenter also suggested that the RMP include

requirements for public education on the sage-grouse. To protect the sage-grouse's habitat, commenters suggested that the BLM not lease sage-grouse habitat for development, require NSO within certain distances of sage-grouse leks, and time spraying to avoid occupied habitats. Commenters recommended various surface occupancy buffer limits for sage-grouse habitat and preservation of "large blocks" of sagebrush habitat. Additionally, a commenter requested that the BLM continue to monitor ground and aerial cover and vegetative diversity for sage-grouse habitat.

Vegetation

Multiple comments expressed concern over vegetative community degradation in the Planning Area. Commonly mentioned causes of this degradation included fire, erosion, livestock, and invasive species. Commonly mentioned vegetative types in need of management action included aspen, pine, riparian vegetation, and sagebrush communities; juniper communities were mentioned as in need of control. Commenters suggested a variety of treatments (including mowing, burning, and replanting using native species) to enhance and maintain appropriate vegetative communities. However, one commenter cautioned against certain treatment options (such as clearcutting) and any treatment in certain forest types. Several comments mentioned the importance of preserving and enhancing native species and one mentioned old growth forest and dead snag preservation. Several commenters expressed concern over the preservation of cryptobiotic soils, and one commenters requested monitoring, protection, and restoration of this resource.

Wild Horses

The BLM received 47 comments concerning wild horse management within the Planning Area. Many commenters asked the BLM to manage the size of the wild horse herd to the current legally designated number to minimize overgrazing, stop the establishment of new trails to water resources, prevent impacts on native wildlife species, avoid the loss of other multiple uses, and minimize adverse impacts on range management goals. Commenters encouraged the use of roundup and sterilization techniques to manage herd size. A commenter raised concerns about the cost of the wild horse management program and suggested that the BLM sell excess horses without limitations. Some commenters suggested that livestock should have equal consideration in grazing range capacity and the allocation of animal unit months (AUMs). Multiple commenters asked for improved protection for the McCullough Peaks and Fifteenmile Herd Management Areas.

Multiple commenters advocated for the long-term protection of the three wild horse herds, the expansion of their range, and an increase in efforts to improve the herds' genetic diversity and viability. Suggestions included the elimination of cattle allotments in areas used by wild horses, a halt to wild horse herd reductions, and the restoration of herd management areas to the large size allocated under the Wild Horse and Burro Act of 1971. While some commenters asked that BLM protect wild horses from drilling and oil production impacts and consider eliminating activity during foaling season, others noted that wild horses have become habituated to humans and do not necessarily need pristine wilderness habitat. One commenter asked that helicopter roundups be replaced with horse-back rider roundups to minimize herd stress and injury.

Cultural and Paleontological Resources

The BLM received 66 comments related to cultural and paleontological resources. Multiple commenters noted that the Bighorn Basin has unique and important cultural and paleontological resources, as well as these resources susceptibility to damage by other land uses. Commentors expressed concern about allowing any amount of damage to these sites due to the rapid rate of decay and irreparable nature of these sites. Several other commenters mentioned the possibility of cumulative impacts from small-scale disturbances by other land uses.

The BLM received multiple comments related to cultural and paleontological site inventory, monitoring, and enforcement. Some comments supported the creation of an area wide sampling strategy to identify and monitor cultural sites, and others requested pre-surface disturbance and post-fire inventories and studies be required. Other comments suggested the BLM balance the study of paleontological resources by qualified investigators with resource protection, and one comment requested collection of vertebrate fossil collection permits be restricted to research groups. Multiple comments supported additional monitoring and enforcement/site security to prevent loss of Bighorn Basin cultural resources. Native American sites (such as petroglyphs and teepee ring sites) and historic trails were mentioned specifically as resources in need of identification, protection, and study. One commenter requested that several historic trail routes including those in the Trail Creek area, Three Crossings area, North and South forks of the Shoshone, and trails that lead across the Bighorn Basin to the Wind River Range be designated as National Historic Trails. One commenter called for a “zero-tolerance legal enforcement campaign” to protect cultural sites. Several areas in the Planning Area were specifically mentioned by commenters as cultural and paleontological sites worthy of additional protections including Clark’s Fork River area, Jimmy Wooten’s Grave, Gebo/Crosby Historic Mining District, Castle Gardens, and Coal Draw. Additional protections for rock art areas were commonly requested and there were frequent mentions of the Meeteetsee Rock Art Area, areas near Sunnyside Lane, Grass Creek area, Little Sand Draw, Buffalo Basin, Upper Middle Owl Creek, Kirby Creek sites, Legend Rock, and the western slope of the Big Horn Mountains as rock art areas worthy of protection.

Several commenters noted that not all sites were of significance or in need of protection. These commenters stated care must be taken to balance the significance of each find and its impact on the other uses of the area. One commenter suggested a time limit be imposed to prove a site was significant. Another commenter expressed concern that current procedures for granting archeological clearance to perform other multiple uses (i.e., energy development, water development, etc.) were “burdensome and tediously slow.”

Some comments recommended integrating cultural resources into interpretation/education, volunteer, and habitat protection efforts. Other comments suggested increased numbers of signs, information for visitors, and interpretive sites be developed.

Visual Resources

The BLM received 27 comments concerning visual resources in the Planning Area. Multiple commenters noted that nighttime views of stars in the Planning Area have been degraded by

lights associated with mining and drilling facilities and suggested the BLM should monitor current lighting levels and prevent unnecessary lighting. Commenters asked the BLM to factor visual resources into decisions regarding cultural resources and WSAs, and use topography to mask visual disturbances. Another commenter requested wilderness qualities and views from WSAs and historic trails be considered when deciding visual resource management classifications. One commenter expressed concern about the visual impacts of fugitive dust from mining and others mentioned the possibility of a loss of visibility from oil and gas-related air quality impacts. Commenters suggested using GIS to map viewsheds and suggested the use of various mitigation measures to limit visual effects from development, including the use of berms, shield equipment storage areas, and site reclamation. Some commenters requested that scenic viewsheds be identified and protected and suggested protecting several vistas including the sandstone outcrops along Highway 120, area north of Meeteetse Rim, the Belfry Highway vistas, Whistle Creek badlands, the highway between Shoshoni and Casper, and the Bighorn Mountains near Shell Canyon and Ten Sleep.

Commenters also mentioned the aesthetic and socioeconomic value of viewsapes associated with open space and working landscapes. Some commenters suggested that working landscapes such as rangeland and open space be recognized as helping maintain desirable viewshed aesthetics. One commenter requested that the BLM define “open space” in relation to visual resources. Another commenter suggested that the BLM conduct a baseline analysis of open spaces in the Planning Area and identify scenic viewsheds with a defined perspective.

Lands and Realty

The BLM received 55 comments related to lands and realty. Multiple commenters supported the idea of consolidating public holdings to benefit various land uses and resources. A number of commenters also supported the sale or transfer of isolated parcels of public land and often suggested methods to determine who should be given priority to purchase the parcels, such as to individuals with existing private improvements on the parcel. Several commenters requested the BLM consult with other surface landowners concerning land tenure adjustment and consider concerns of surface owners when making planning decisions. One commenter requested the BLM streamline the conservation easement and land exchange process as part of the RMP. Another commenter asked that the BLM designate certain lands under the Desert Land Act. Others mentioned that no net gain of public land should occur; conversely, several comments stated that no net loss or redistribution of public lands should occur. Several comments requested the BLM consider wildlife riparian areas, and water resources when granting rights-of-way or expressed concerns over possible transfers of important wildlife habitat. The support for the idea of clustering utilities in existing rights of way was also mentioned, though another commenter cited possible drawbacks to this approach. Finally, a commenter suggested the BLM acquire the parcel of private land in the McCullough Peak area.

Commenters were split on the issue of the disposal of BLM-administered lands for residential development in the Planning Area. Some commenters were against such development on BLM-administered lands, while others were for appropriate levels of such development or supported it as a way to reduce development pressure on farmlands. One commenter suggested that

BLM-administered lands interspersed with private lands or near existing development be considered for community development projects.

The BLM received a number of comments regarding communication infrastructure in the Planning Area as well. Commenters suggested that government and commercial access to long-term communications rights-of-way access should be a top priority. Commenters stated that increased communication infrastructure in the Planning Area would enhance emergency communications capabilities and wireless communication availability in rural areas and on tribal land.

Public Access

Multiple comments expressed concern over a lack of established public access across private land to public parcels.

Comprehensive Trails and Travel Management, and OHV.

The BLM received 121 comments on travel management issues, principally on the topic of OHV use. The primary issue was the use of designated roads and trails. Comments of this type dealt with issues related to the size of the existing road and trail network, whether additional routes or fewer routes were needed, whether OHVs should be restricted to existing routes designated “open,” and whether travel and trail management areas for OHVs were needed. Several commenters stated that motorized access was needed for elderly and handicapped persons to access public land and another noted access was needed for predator control activities. Other requests included better use of signs to indicate if routes were open or closed, parking near routes closed to motorized vehicles for hiking/horseback riders, and additional trails and trailheads. A few commenters suggested developing more motorcycle use only trails or single track in order to relieve pressure on heavily-used OHV trails. Several commenters supported the protection of sizeable roadless and low road density areas from new road construction. Several commenters also suggested the BLM designate “open riding areas” and allow overland travel instead of creating new roads as a way to avoid some environmental impacts.

Some commenters expressed concern about OHV-related impacts on public lands, soil, vegetation, wildlife, public safety, air quality, and noise impacts in the Planning Area. Resource degradation was commonly mentioned by commenters requesting additional route restrictions or closures. Multiple commenters identified a need for additional monitoring and enforcement related to OHV activities, such as OHV Management plans, primarily to reduce resource degradation related to off-trail use and trash dumping. Other comments recommended the designation of OHV “play” or “sacrifice” areas in existing high use areas. Commenters suggested these types of areas as a way to concentrate OHV activities and impacts while still allowing for a type of desired user experience. Multiple commenters requested that OHVs be eliminated from certain areas (such as WSAs) or restricted to designated OHV-use areas and environmentally preferable routes. Other commenters suggested that resource damage could be avoided through road and trail maintenance. Several commenters stated that education for OHV riders, such as the Tread Lightly program, should be used to prevent OHV-related resource damage, and one commenter suggested designating an OHV training/education area near each city in the Planning Area to improve OHV users compliance with BLM rules and regulations.

One commenter suggested that areas where concerns about the visual impacts of roads were an issue could be designated for motorcycle use only, because they require a smaller, single-track trail.

Recreation and Visitor Use

The BLM received 30 comments related to recreation and visitor use. Multiple commenters suggested the BLM maintain or enhance recreational access to public lands for a variety of activities. Some commenters requested target shooting be restricted to certain areas and removed from high use areas or all non-designated locations for safety reasons. Several commenters suggested the BLM provide information to recreationists regarding rules, regulations, and closures. Several others suggested that additional interpretive signs were needed for area visitors. One commenter was concerned that recreation was causing damage to rangeland, but that damage was subsequently attributed to livestock grazing. Other commenters included requests for some lands to be maintained or improved as recreational semi-primitive motorized and semi-primitive nonmotorized areas (as described under the recreation opportunity spectrum) and another asking that all areas be open to mountain biking. Some commenters included specific requests for protections of popular recreation areas including the area adjacent to Beck Lakes Park, Rattlesnake Butte, the north rim of the Oregon Basin, and the Red Lakes area. One commenter requested closing to hunting an area of land on the Lower South Fork Road. Another comment discussed protecting certain areas from motorized use including the area north of Newton Lakes, the area west of Cody Shooting Complex, and the area east of Trail Creek Ranch.

Several commenters also requested the BLM establish activity specific recreation areas on public land. These comments included requests for shooting ranges, OHV playground areas, nature trails near population centers, and local partnerships to establish motocross tracks.

Livestock Grazing

The BLM received 78 comments related to livestock grazing. Many of the comments received were in favor of continued managed grazing in the Planning Area. Commenters cited the benefits of grazing on vegetation, fire and noxious weeds control, its benefits to wildlife, the social and economic benefits of the activity on local communities, and grazing as a way to protect open space and “working landscapes” from fragmentation. One commenter asked the BLM review and streamline the grazing permitting process as part of the RMP revision.

Many comments discussed AUMs, range improvements, and cooperative management. Several commenters requested AUM levels remain at current levels or revert to previous higher levels, other comments requested AUMs be reviewed frequently and adjusted based on sound science. Several others suggested AUMs be increased based on permittee-installed range improvements and others simply requested no net loss of AUMs. Multiple comments dealt with range improvements. These comments requested BLM develop water sources for livestock and wildlife benefits, streamline the process for refurbishment and installation of improvements, and recognize the importance of such improvements in the RMP. Commenters requested cooperative management between permittees and the BLM.

Multiple commenters suggested livestock should be managed to ecologically sustainable levels and that livestock and wildlife grazing be managed to prevent overgrazing and conflict with other land uses. Some comments suggested management approaches that included: adaptive management to allow appropriate AUM adjustments, timing restrictions and monitoring for grazing in riparian areas, restricted grazing levels for upland areas, grass banks for use during lean grazing times, more rotational grazing allotments, use of the *Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management for the Public Lands Administered by the Bureau of Land Management in the State of Wyoming*, and formal adoption of the *Standards and Guidelines for General Application to All Components of the Rangeland Ecosystem* and the *Standards and Guidelines for Unhealthy Ecosystems*. Requests were also made to address conflicts between sheep trailing areas and grey wolf/grizzly bear use areas, and between livestock and sage-grouse. A commenter also requested the BLM impose measures to minimize the transmission of diseases from livestock to wildlife.

Some commenters requested additional restrictions on grazing in the project area. Several commenters suggested discontinuing permits in specific wildlife habitats and specially designated areas. Other comments requested the elimination or reevaluation of grazing in riparian areas and low-precipitation areas. Management requests surrounding riparian and wetland areas included, requiring herders be onsite/directing livestock away from these areas, not relying on salt blocks to draw animals away from these areas, and fencing off natural springs/moving livestock water sources. Multiple comments suggested that the Planning Area was being overgrazed and others suggested that grazing should be heavily restricted, subjected to timing requirements, or eliminated from public lands due to overgrazing or conflicts with other uses, such as recreation and wildlife.

Special Designation Management

The BLM received 74 comments concerning special designation management in the Planning Area. Many commenters encouraged continued protection for WSAs, crucial wildlife habitat, migration corridors, and recreation areas, while others opposed not only future expansion of special designations, but also current designations that block public access or commercial development. Concerns were raised that the BLM does not have enough inventory information to correctly analyze WSAs, ACECs, or other special designations. Another commenter suggested that BLM develop buffer zones around special designation areas to prevent harsh land use boundaries. Areas mentioned for special designations include: the Citizens Proposed Wilderness Areas, Clark's Fork Canyon, Badger Basin, Newton Lakes, Alkali Creek, Bobcat Draw Badlands, Buffalo Creek, Cedar Mountain, Honeycombs, Medicine Lodge, Fifteenmile area, McCullough Peaks, Owl Creek-Castle Rocks, Paint Rock Creek Canyons, Pryor Mountains, and Trapper Canyon, Carter Mountain alpine area, Upper Owl Creek area, and Red Butte. Many commenters requested these areas be managed to preserve their special qualities, leased only under NSO restrictions, and be withdrawn from surface disturbing activities.

Multiple commenters requested that all the current ACECs in the Planning Area retain their designations or requested additional resource-specific ACECs. Some commenters added that where ACECs do not overlap with WSAs or Citizens Proposed Wilderness Areas, protective stipulations (such as NSO stipulations) should be put in place to ensure their preservation.

Several commenters recommended an increased focus on wildlife ACEC designations, or other special designations to prevent damage to special value wildlife habitat, especially areas such as designated big game crucial winter ranges and sage-grouse core areas. Several commenters also suggested designation of additional cultural and paleontological ACECs, such as the Morrison Formation or Polecat Bench. One commenter specifically requested interpretive signs along the Red Alkali Scenic Byway include information on the geology of the area. Other commenters requested reevaluation or removal of special designations.

Multiple comments dealt with the management of WSAs in the Planning Area. Some commenters supported the preservation of wilderness characteristics or protective management of WSAs. One commenter suggested that WSA designation creates tourism opportunities in the Planning Area. Some commenters asked for continued protection and continued access to McCullough Peaks and Bobcat Draw WSAs, and that McCullough Peaks be declared off-limits to drilling and road improvements. One commenter asked that the BLM not include any rivers in the Wild and Scenic River (WSR) system unless water is present and flowing at all times. Others encouraged the BLM to recommend eligible WSRs for designation and protect eligible rivers until a determination is made by Congress.

Cave and Karst Resources

The BLM received several comments regarding cave and karst resources within the Planning Area. Commenters asked that the BLM identify significant cave and karst resources and protect them as required under the Federal Cave Resources Protection act. One commenter requested that stipulations limiting caver days be adopted for clean caves such as Titan, Holey Sheep, and Tres Charros caves.

Socioeconomic Resources

The BLM received 36 comments concerning socioeconomic issues in the Planning Area. Many commenters encouraged the balancing of agricultural, mineral, and recreational uses on BLM-administered lands.

Some argued that mineral and oil and gas exploration and production on public lands are vital because these activities provide numerous, high-paying jobs and tax revenue to local economies in addition to meeting national energy needs. Some of these commenters were concerned about over-regulation of the industry. They asked for an analysis of the historical context and socioeconomic impacts of oil and gas development on the Planning Area, including the cost of administering the minerals program on BLM-administered lands. Additionally, other commenters encouraged alternative energy development in the Planning Area, as well as an economic shift toward service and information technology jobs. A commenter suggested the BLM should make economic sustainability its highest priority during the planning process. One commeter requested that the reasonably foreseeable development analysis the BLM conducts examine the effects of BLM-administered land development on county services and health issues.

Many commenters mentioned the importance of grazing, and to a lesser extent forest products, to industry and individuals in the Planning Area. Some commenters felt that grazing on public land represented a vital economic value to agricultural producers and to local

communities, and the economic impacts of any proposed or previous change in AUMs should be included in the RMP revision. Multiple commenters requested that timber harvest be allowed to proceed in some areas to reduce fuels and benefit the local economy. Commenters also mentioned a desire for permits/free use of other forest products, such as Christmas trees or firewood.

One commenter stated that by protecting wildlife, viewsheds, vegetation, and wilderness characteristics, the BLM protected jobs in the recreation and tourism sector, a sustainable industry that is vital to local economies, such as Cody and Thermopolis, in Wyoming. Another argued that oil and gas activity degraded the recreational experience and could damage the tourism industry. Additionally, one commenter requested that BLM acknowledge how water, landfill, and road surface changes will impact local municipal service taxes.

3.4 Issues and Comments for No Further Analysis

Most of the comments received were related to planning issues that will be addressed in the RMP revision (as discussed above). However, a number of comments raised issues that will not be addressed in the RMP revision. These included changes to regulations and BLM policies, issues outside the scope of the planning process, comments that were too vague, comments on the planning or public involvement process, and requests for site-specific actions.

- Regulations and BLM policy issues involved requests for changes to, or continuation of, state or national BLM policies or existing laws and regulations. These types of policy and regulatory decisions are set by the BLM at the national level. Examples of this type of comment included requests to redefine visual resource management criteria, comments stating the BLM should follow the principle of multiple-use, or comments stating the BLM should revise RMPs every five to ten years.
- Issues outside the scope of the planning process included request for the BLM to take actions outside of the agency's jurisdiction or manage resources not within the Planning Area (such as the Encampment River). Examples of such comments included a request to stop the take of female big game animals in the Planning Area and multiple requests to close/keep open areas for hunting since game species and hunting are under the management of the Wyoming Game and Fish Department. These comments are examples of actions outside the BLM's jurisdiction. Another example of out of scope comments of this type dealt with WSA and Wilderness Area designation. The BLM received multiple comments that supported or opposed designation for all potential WSAs as Wilderness Areas, supported the adoption of the Citizens' wilderness recommendations, or asked that WSAs not be expanded in the future. The designation of WSAs to Wilderness Area status is the sole responsibility of the United States Congress, and no changes to existing WSAs or creation of new WSAs can occur until the Congress acts on the existing set of recommendations for WSAs before it.
- Comments that were too vague included general statements regarding such things as the need for environmental protection, where the issue of concern was unclear.
- Planning and public involvement process comments included requests for the BLM to follow required planning statutes (such as NEPA or FLPMA), requests for increased

public outreach to individuals and organizations regarding the RMP and EIS process, requests for an extension of the scoping period past the original November 17, 2008 deadline, and a request for written details of the project budget.

- Requests for implementation level (i.e., project or site-specific) management actions included requests that could not properly be addressed at the RMP level. Comments of this type included a request for a recreation permit for the Paintrock Basin area or requests for contracts/agreements between the BLM and local organizations for trail maintenance.

3.5 Valid Existing Management to be Carried Forward

The BLM is reviewing the condition of the existing environment and the management situation to identify which management decisions should be carried forward or modified and where there are opportunities for change. This information will be summarized in the Summary of the Analysis of the Management Situation and posted on the project website in the near future.

3.6 Special Designations, Including Nominations

Commenters mentioned that a number of areas are deserving of special designations (such as ACEC designation) or otherwise indicated that they required additional management protection; these areas are described in the preceding comment summaries.

Nominations for special designation will be carried forward for the interdisciplinary team to evaluate. Those nominations that arose during public scoping, in addition to any nominations developed during ongoing internal BLM scoping and all existing Special Designations, will be reviewed as part of the RMP revision process.

4.0 DATA SUMMARY/DATA GAPS

The development of the RMP and EIS will use both updated existing and new data. Multiple commenters suggested that the BLM conduct baseline studies of the resources in the planning process including: water, wetland and riparian resources; soil resources; wildlife and special status species; vegetation; air quality; and cultural and paleontological resources. The BLM is currently collecting new baseline data, or updating existing data, where such information is needed to develop alternatives or complete the analysis of resource impacts. This new resource data is being generated and digitized into geographic information system themes. Both new and existing data will meet BLM standards and will become part the publicly available administrative record for the planning process.

The Cody and Worland Field Offices only have seven complete resource data map themes. All of the other resource map data themes (approximately 87) are at various stages, ranging from no data collected yet to themes that are completely digital, but have no metadata written for them. Development of the data needed for the RMP revision will require significant time commitments from staff and may need to be supplemented by Washington Office, Wyoming State Office, and contracting staff assistance.

5.0 SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

Following the completion of the scoping process, the BLM will develop its goals, objectives, and alternatives in partnership with cooperating agencies. Alternatives will be responsive to the planning issues identified in this report (as well as any other raised following scoping but before publication of the Draft EIS) and will achieve the planning process goals and objectives. Following the development of the alternatives, the BLM will perform an analysis of all the alternatives and will select its preferred alternative. The preferred alternative in an RMP is often composed of management options from the other alternatives, combined in a way that the BLM believes will provide the most beneficial combination of different land uses and resource conservation.

The next designated public comment period starts with the publication of the Draft RMP and EIS. The draft document will be distributed to individuals, agencies, and organizations on the general mailing list, as well as all cooperating agencies. The Draft RMP and EIS will also be available via the RMP revision website, available at www.wy.blm.gov. The availability of the Draft RMP and EIS will be announced in a Federal Register Notice of Availability. A 90-day public comment will begin following publication of the Notice of Availability. Publication of the Draft RMP and EIS is anticipated in the spring of 2010.

Following the Draft RMP and EIS public comment period, all of the public comments the BLM received will be considered and revisions will be made if warranted. After any changes are made, the publication of a Proposed RMP and Final EIS will be announced in the Federal Register. A 30-day public protest period will begin following publication. The Governor of Wyoming will review the document during the public protest period to assure the RMP is consistent with state and local level plans and policies. If significant substantive alterations are made as a result of protests, the BLM will publish a Federal Register notice requesting additional comments.

The BLM will address any public protests or inconsistencies identified by the Governor and will publish a Record of Decision and Approved RMP. A Federal Register notice will be published to announce the Record of Decision and Approved RMP.

The BLM is committed to keeping the public informed concerning the RMP revision. All of the materials and documents related to this RMP revision will be made available on the project website. Dates for the official public comment and protest periods, along with other relevant project dates, will also appear on this website. For additional information on the planning process, to be added or removed from the mailing list, or to submit a comment on the RMP revision, please contact the RMP Project Manager, Caleb Hiner at PO Box 119, Worland, Wyoming 82401-0119. Members of the public can also email a request to BBRMP_WYMail@blm.gov.

6.0 EXAMPLES OF SPECIFIC ISSUES COVERED BY THE BROAD PLANNING ISSUE STATEMENT

The following section provides examples of the types of more specific issues that are encapsulated in the broad planning issue statements presented in section 3.2 of this document. These more specific issues arose out the Preparation Plan for the Bighorn Basin Resource Management Plan Revision (available at www.wy.blm.gov), internal scoping, and the public scoping comments. In the section below, each of the planning issue statements appears in a grey shaded row and the more specific issues it encapsulates appear in the unshaded rows that follow.

Resource Category	Specific Planning Issue
1. Climate Change: How can the BLM incorporate climate change into its land management practices?	
Climate Change	How should the BLM incorporate climate change into its land management practices?
2. Watershed and Air Management: How can the BLM manage use of public lands while protecting watershed and air quality?	
Public Safety	Watershed protection for community drinking water, soil stability, and ground water purity should also be examined.
Riparian Areas/Wetlands/Watershed & Ecosystem Planning	Incorporate the Riparian Initiative and pertinent Rangeland Health into the RMP and use these for broad management guidance, i.e., manage to achieve minimum threshold of PFC.
Riparian Areas/Wetlands/Watershed & Ecosystem Planning	Identify threats that can negatively influence riparian/wetland habitat.
Riparian Areas/Wetlands/Watershed & Ecosystem Planning	Prioritize BLM riparian/wetland based on laws (i.e. T&E Species Act, Clean Water Act, etc.)
Water/Air Quality	Recognize and plan conformance with Wyoming Department of Environmental Quality and its primacy on water quality.
Water/Air Quality	Prioritize water bodies based on laws, regulations, and beneficial uses, and the value they provide to the public.
Water/Air Quality	Management for Non-attainment streams?
Wetland/Riparian Areas and Water Quality	How can BLM-administered lands be managed to protect and improve wetland and riparian areas in the Planning Area?
Wetland/Riparian Areas and Water Quality	How can BLM maintain or improve water quality while meeting the needs of other resources and resource uses in the planning area?
–	How can BLM best manage intermittent/ephemeral streams in the Planning Area?
–	How can BLM protect groundwater resources in the Planning Area from oil and gas exploration and development activities?

Resource Category	Specific Planning Issue
-	How can BLM participate in the process of identifying and investigating local and regional water development projects (i.e. reservoir development) on or adjacent to Public Lands in the Planning Area to proceed in a manner that meets the needs of local communities without hindering BLM management responsibilities?
-	A PIS may be necessary that addresses addressing water and watershed impacts and impacts to aquatic resources from OHV and surface disturbance.
-	How can BLM management actions in the Planning Area improve water quality for those streams placed in non- attainment status by the Wyoming Department of Environmental Quality?
-	What management actions must BLM take to protect community water sources on or adjacent to Public Lands in the Planning Area?
-	How can BLM manage soil, water and air impacts from OHV use and other surface disturbance?
-	How can BLM management actions protect soil biological crusts in the planning area?
-	How can BLM permit surface disturbing activities while protecting soil and watershed resources?
-	How can the BLM allow human activities to occur without degrading air quality?
-	<p>One example of an issue that was merely alluded to within a broader topic is the concern over Bighorn Lake sedimentation. This particular issue affects a multitude of other areas, yet it only received one line in the Draft Scoping Report. The BLM should consider Bighorn Lake sedimentation a significant issue to be addressed in the EIS because it directly affects hydrology, water quality, fisheries, recreation opportunities, riparian habitats, and other important aspects of the Bighorn Basin’s resources.</p> <p>Low average annual precipitation, low vegetative production, and higher percentages of bare ground produce high natural sedimentation rates in the Bighorn Basin.</p>
<p>3. Energy and Minerals Management:</p> <p>Which areas should be open to mineral and energy development, and how should BLM manage such development while protecting human health as well as natural and cultural resources?</p>	
Realty and Lands Authorizations	What areas are suitable for wind energy development and what areas should be avoided?
Development of Energy, Minerals, and Related Issues	What type of coal-bed methane development and related issues should be planned for in the new RMP?
Development of Energy, Minerals, and Related Issues	How reclamation of sagebrush can be improved, and effects of mining on sage grouse be minimized in locatable mineral mining areas?
-	How can the BLM allow human activities to occur without degrading air quality?

Resource Category	Specific Planning Issue
-	What if any areas should be withdrawn from locatable mineral entry?
-	What if any areas should be closed to mineral leasing or mineral material disposal?
-	Should No Surface Occupancy stipulations or no leasing take place to Wildlife Habitat Management Areas (WHMAs) administered by the Wyoming Game and Fish Department in the planning area?
-	How should coal-bed methane and other natural gas development and related issues be analyzed in the new RMP?
-	Can the RMP anticipate impacts of full oil or gas field development as opposed to individual well-by well impacts?
-	How will BLM deal with anticipated requests for exceptions to wildlife stipulations that come in from oil and gas operators? How can field checks by BLM be improved to ensure oil and gas operators are in compliance with terms of their approved permits?
-	What are the cumulative effects of bentonite mining on other natural resources in the Bighorn Basin planning area, especially sagebrush-dependent species, and how should these be identified, analyzed, and addressed in RMP and in future NEPA documents?
-	How can reclamation of sagebrush and other native plant species disturbed by mining, be improved in the Bighorn Basin?
-	How can the RMP address the impacts of increasing failed reclamation of areas disturbed by bentonite mining, and the likelihood of the effect of future reclamation failures effects on wildlife habitat?
-	How can the effects of mining on sage grouse and their habitat be minimized in locatable mineral mining areas?
-	How can BLM protect groundwater resources in the Planning Area from oil and gas exploration and development activities?
-	How can the deep basin-center gas play be responsibly explored and developed while protecting other natural resources over the next planning cycle?
-	What areas will be impacted by new energy corridors such as power line and pipeline corridors and how will this affect leasable, locatable and salable minerals activities?
-	What types of renewable energy resources could be proposed and developed in the Bighorn Basin field offices over the long term and how will this affect leasable, locatable and salable minerals activities?
-	What is the reasonably foreseeable development scenario for energy and mineral resources in the Bighorn Basin planning area?
-	What specific types of baseline data should BLM require from minerals applicants in order to conduct proper NEPA analysis of proposed actions? Should Health Impact Assessments and air quality monitoring data be required in some circumstances?

Resource Category	Specific Planning Issue
-	Should any areas be designated as ACECs, Research Natural Areas, or other special designations to better manage development of leaseable, locatable, and salable minerals within their boundaries?
Development of Energy, Minerals, and Related Issues	What areas will be impacted by new energy corridors such as power line and pipeline corridors?
Development of Energy, Minerals, and Related Issues	What types of renewable energy resources could be proposed and developed in the Bighorn Basin field offices over the long term?
Energy and Minerals Management	Which areas should be open to mineral and energy development?
Energy and Minerals Management	How can BLM permit mineral and energy development while protecting human health as well as natural, biological, and cultural resources?
-	How can BLM protect groundwater, especially where used for drinking water by rural residents, from contamination related to oil and gas activity?
-	In what areas should NSO lease stipulations combined with best management practices and mitigation be required in order to protect drinking water sources?
Energy and Minerals Management	How can the BLM manage produced water from oil and gas development to limit adverse impacts and maximize beneficial uses
-	How can BLM manage produced water from oil and gas development to limit adverse impacts to water quality while maximizing beneficial uses?
4. Fire and Fuels Management: How can the BLM manage fire and fuels to protect public safety as well as natural and cultural resources?	
Urban Development	How will vegetation be managed to strategically minimize the fire risk to adjacent rural subdivisions, towns, cities, industrial sites, and communication sites? (Wild land-Urban Interface)
Fire/Fuels Management	How will guidance be implemented from the National Fire Plan to reduce hazardous fuels and achieve desired future conditions?
Fire and Fuels Management	How can the BLM manage fire and fuels in the Planning Area to protect natural, biological, and cultural resources?
-	How can the BLM utilize prescribed and/or wild fires to enhance or benefit biological conditions, including wildlife habitat, range conditions and watershed health?
5. Invasive and/or Noxious Species: How can the BLM manage the spread of and mitigate impacts associated with invasive species and/or noxious weeds?	
Invasive and/or Noxious Species	How will invasive species and/or noxious weeds be controlled across the planning area?
-	How can BLM management actions and prescriptions reduce or eliminate the spread of weedy annual species, most notably cheatgrass, in the planning area?

Resource Category	Specific Planning Issue
Invasive and/or Noxious Species	How invasive species and/or noxious weed concerns are incorporated in all BLM programs?
Invasive Species	What measures should be taken to prevent the spread of and mitigate the damages associated with invasive species
6. Fish, Wildlife, and Special Status Species:	
How can the BLM manage public land use while maintaining and improving terrestrial and aquatic habitats?	
Urban Development	Do management decisions take into account required corridors for wildlife, particularly T&E species such as Canada lynx grizzly bears, and gray wolf?
Urban Development	How will the BLM manage habitat fragmentation as it relates to urban interface and rural utility needs?
Special Status Species Management	The planning area contains one of the largest areas of contiguous undisturbed sage grouse habitat. What management prescriptions are needed to preserve this habitat in functioning condition?
Special Status Species Management	How grizzly bear and wolf habitat will be managed after delisting?
Special Status Species Management	What special management considerations would be needed to incorporate/coordinate with other programs to conserve reproductive habitat for mountain plover and long bill curlew?
Aquatic/Fish Habitats	Prioritize aquatic/fish habitats based on laws (T&E Species Act and Yellowstone River Cutthroat trout, Clean Water Act, etc.), regulations and values they provide to society (consider WY Game and Fish Dept. Aquatic Priorities).
Wildlife Habitat/Native Plant and Animal Habitat Management	What actions and/or area wide use restrictions are needed to maintain adequate habitat conditions?
Wildlife Habitat/Native Plant and Animal Habitat Management	Designate as “suitable for reintroduction” the black footed ferret essential habitat area near Meeteetse.
Wildlife Habitat/Native Plant and Animal Habitat Management	Should predator management be allowed on public land?
Biological Resources: Fish, Wildlife, Special Status Species, and Vegetation	How can the BLM maintain and improve terrestrial and aquatic habitats for fish, wildlife and special status species, including sage-grouse habitat, while maintaining multiple-use land management?
–	How can BLM ensure that in-stream flow needs are met for aquatic habitats?
7. Wild Horses:	
How can the BLM manage wild horses on public lands while also protecting natural and cultural resources.	
Wild Horses	Would HMAs be designated as wild horse range?
Wild Horses	Are adjustments of appropriate management level (AML) needed, or adjustments to the HMA boundaries?

Resource Category	Specific Planning Issue
Wild Horses	How could habitat and water distribution in HMAs be improved? Are the herd management plans still appropriate?
Wild Horses	Where are visitor/public interpretive sites development and education needed?
Wild Horses	How can Herd Management Areas be managed to maintain healthy wild horse populations and to prevent overgrazing and conflicts with other land uses?
-	What is the Appropriate Management Level (AML) of the Herd Management Area's (HMA's) given the new scientific data that has been gained from research?
-	Are the boundaries of the HMA's appropriate and accurate?
-	Should the McCullough Peaks HMA be designated as a Wild Horse Range due to its outstanding opportunity for public viewing?
-	Should allocation and adjudication of Animal Unit Months (AUM's) be re-visited with the McCullough Peaks and the Fifteenmile HMA's?
-	What area-wide restrictions are needed to protect wild horse winter ranges, foaling seasons, and or possibly year-round?
<p>8. Cultural and Paleontological Resources:</p> <p>How can the BLM manage paleontological, cultural, and traditional resources to provide both resource protection and opportunities for public education and study?</p>	
Cultural Resources (including historic trails) Management	Re-evaluate the impacts to other resources when measures are applied to protect cultural and historic properties. Evaluate all cultural resources in the management area to identify those which require management plans and those which are appropriate to acquire (See Appendix D for Class I report requirements).
Paleontology	Should paleontological overview reports (large scale ground surveys) be required in certain areas that are rich in scientifically significant resources?
-	How can paleontological resources best be managed in a way that protects these resources, consistent with existing laws, regulations and policies?
-	How can the BLM's Potential Fossil Yield Classification (PFYC) system be best implemented to protect paleontological resources in the planning area?
-	Should paleontological overview reports (large scale ground surveys) be required in certain areas that are rich in scientifically significant resources to improve management of these resources?
-	How can the BLM better educate the public on the importance of paleontological resources and their preservation in the planning area?
-	How can scientifically important paleontological resources be best protected from theft and vandalism in the planning area?
Cultural and Paleontological Resources	How can the BLM manage paleontological localities, cultural sites, and traditional cultural properties to provide both resource protection and opportunities for public education and study?

Resource Category	Specific Planning Issue
<p><i>9. Visual Resources:</i></p>	
<p>How can the BLM manage public lands for visual qualities?</p>	
Urban Development	Visual impacts of development near communities.
Visual Resource Management (VRM)	VRM inventory and classifications in the Cody Field Office, Administrative Unit would be reviewed and changes made as necessary.
Visual Resources	How can viewshed and open space be managed to maintain and enhance the visual qualities of public lands in the Planning Area?
<p><i>10. Lands and Realty:</i></p>	
<p>What land tenure and management adjustments are needed to meet access and development needs, while also protecting natural and cultural resources?</p>	
Land Tenure Adjustment	Clarify existing and designate new areas for right-of-way avoidance or exclusion.
Land Tenure Adjustment	What lands should be identified for retention, disposal, or acquisition?
Realty and Lands Authorizations	How will overlapping national/regional corridor planning efforts be addressed in Bighorn Basin efforts?
-	What lands are potentially suitable for disposal/acquisition by BLM?
-	Where are the r/w corridors and r/w avoidance/exclusion areas?
-	What areas need to be withdrawn from mining location?
Realty and Lands Authorizations	Where are rights-of-way avoidance and exclusion areas? What restrictions should be applied near rock art areas (Legend Rock, Meeteetse Draw, etc.)?
Cadastral	Identify areas requiring survey.
Cadastral	Identify areas requiring immediate trespass resolution in relationship to boundaries.
Lands and Realty	How can BLM-administered lands be managed to balance development needs with open space, working landscape preservation, and the protection of natural, biological, and cultural resource values?
Lands and Realty	What land tenure adjustments are needed to improve access to public lands?
-	Should be category for Energy Corridor, possible law enforcement as that seems to be becoming a more serious consideration with increased demand and use for recreation, particularly OHV use.
<p><i>11. Comprehensive Trails and Travel Management, and OHV:</i></p>	
<p>How can the BLM manage travel on public lands?</p>	
Comprehensive Trails & Travel Management and OHV	What areas are/should be delineated for travel management?
Comprehensive Trails & Travel Management and OHV	Determine the criteria used for designating roads as closed, open, or limited.

Resource Category	Specific Planning Issue
Comprehensive Trails & Travel Management and OHV	Are existing travel management plans adequate for Little Mountain, McCullough Peaks, Rattlesnake, Carter Mountain, and the west slope of the Bighorns?
Trails and Travel Management	How should travel be managed on BLM-administered lands to allow access and recreation while protecting natural, biological, and cultural resources?
Public Safety	Emergency vehicle access to private homes across public land should be planned.
<p><i>12. Recreation and Visitor Use:</i></p> <p>How can the BLM provide recreational opportunities on public lands while protecting public safety, and natural and cultural resources?</p>	
Recreation and Visitor Resources	Are current NSO restrictions adequate for recreation areas or sites?
Recreation and Visitor Use	How can BLM promote recreational use of public lands while ensuring public safety and protection of natural, biological, and cultural resources?
-	Should be category for Energy Corridor, possible law enforcement as that seems to be becoming a more serious consideration with increased demand and use for recreation, particularly OHV use.
<p><i>13. Livestock Grazing:</i></p> <p>How can the BLM manage livestock use on public lands while also protecting natural and cultural resources?</p>	
Forestry	What forest resources are identified for timber or special forest product sale locations?
Rangeland Health and Vegetation Management	What projects are needed to implement best grazing management practices and other resource objectives?
Rangeland Health and Vegetation Management	Do areas exist that require vegetative manipulation to enhance rangeland health including prescribed fire, mechanical, and chemical treatments?
Livestock Grazing	How can the BLM manage livestock grazing on public lands to balance livestock production with the protection of natural, biological, and cultural resources?
<p><i>14. Special Designation Management :</i></p> <p>How can the BLM manage areas that contain unique or sensitive resources?</p>	
Special Designations	Should areas be nominated for Congressional designation (such as NCA for Little Mountain)?
Special Designations	Should a special designation be considered for the “Buffalo Bill Cody Gateway”?
Special Designations	What management goals should be identified for split-estate federal minerals at Heart Mountain National Landmark?
Special Designations	Should there be a Wild Horse Range designation at McCullough Peaks or other special designation for the McCullough Peaks area in general?

Resource Category	Specific Planning Issue
Special Designations	Possible ACEC designation for prairie-dog towns, sage grouse habitat, bighorn sheep, etc.
Wild and Scenic Rivers	How to manage rivers identified as eligible for wild and scenic designation?
Wild and Scenic Rivers	Identify rivers to be reviewed for wild and scenic designation.
Wilderness (Wilderness Study Areas)	Identify site specific goals and protection measures to protect wilderness characteristics.
Special Designation Management	What areas contain unique or sensitive resource values requiring special management?
Cave and Karst Resources	Should cave/karst areas receive special designation and management?
Cave and Karst Resources	Where are significant cave and karst resources located in the Planning Area and what management is needed to protect them?
-	Which existing areas of Special Management Designation should be expanded if any to protect significant natural resources in the planning area?
-	What areas within the planning area contain paleontological resources so significant that they should be designated within a new ACEC or Research Natural Area?
15. Socioeconomic Resources:	
How can the BLM manage public land use with the preservation of local tradition and local economies that rely upon BLM-administered land?	
Environmental Justice/Socio-Economics	How can public land management contribute to the economic stability of small rural communities in the Planning Area?
Environmental Justice/Socio-Economics	How would changing land use affect rural life styles?
Environmental Justice/Socio-Economics	How would land tenure adjustments affect the economic stability of rural communities?
Environmental Justice/Socio-Economics	How would changes to current resource management activities impact tribal communities?
Socioeconomic Resources	How can the BLM balance its mandate for multiple use management with the preservation of local tradition and local economies that rely upon BLM-administered land?

- Planning issues from internal scoping.