

1044

"Robert Keith"
<rkeith@hunter-keith.com>
11/12/2008 05:49 PM
To
<BBRMP_WYMail@blm.gov>
cc
Subject
Bighorn Basin RMP Revision

To Whom it May Concern:

My name is Robert Keith and our family owns property on Trout Creek and on the Northfork of the Shoshone River in the Wapiti Valley just West of Cody, Wy. We utilize the Trout Creek BLM allotment number 03106.

We acquired our initial property in 1991 and we have acquired additional land since that date. It has been and it continues to be our family's desire to maintain these lands largely for the benefit of the wildlife which move through this land. We have worked closely with your people in order that the BLM rangeland that we use not be overgrazed to the detriment of the wildlife. We have significantly reduced the pressure that we put on our own deeded lands so that we might provide more year around forage for wildlife. As such we are pleased that we have been able to use our BLM allotment in concert with our deeded property to allow open spaces and forage for wildlife that is all too often displaced by over development and/or too much people pressure.

Our hope is that in your new RMP you will allow our allotment to remain untainted by mineral extraction activity or other "people pressure" activities that would make these lands uninviting for wildlife. We, as a family, have spent a great deal of time and much in the way of resources to allow these areas to work with our deeded property for the benefit of all the wildlife that pass our way.

Thank you for considering this request.

Robert Keith
Trout Creek Ranch
3659 Northfork
Cody, Wy. 82414

1045

Travis Leck
<tf_leck@hotmail.com>
11/12/2008 01:43 PM

<bbrmp_wymail@blm.gov>

To
cc
Subject
Comments for Big Horn Basin RMP

To whom it may concern:

Any changes to management of BLM lands in the Big Horn Basin will have a profound impact on our community. It is critical that BLM lands continue to allow multiple uses. These uses include Oil and gas exploration and production, agricultural grazing, mining, motorized and nonmotorized recreation, and wildlife habitat.

Oil and gas exploration and production provide needed jobs and tax revenue for the local economy and local governments. Oil and gas development is currently being done responsibly all across the Big Horn Basin. Any additional restrictions on oil and gas development would be unwarranted and unnecessary. Oil and gas development also provides needed revenue to the federal government. Please don't shortchange American taxpayers by discouraging energy development on federal lands.

Sincerely,

Travis F. Leck
38 Gerber Lane
Cody, WY 82414

Color coding for safety: Windows Live Hotmail alerts you to suspicious email. Sign up today.

1046

"George Morris"
<gwm2@msn.com>
11/12/2008 08:29 PM
To: <BBRMP_WYMail@blm.gov>
cc:
Subject: Bighorn Basin RMP Scoping

Bureau of Land Management
Bighorn Basin RMP
Attn: Caleb Hiner
Wind/River Bighorn Basin District
P.O. Box 119
Worland, WY 82401

Subject: Bighorn Basin RMP Scoping Process

The Bighorn Basin is rich in archeological, cultural and historical resources, and outstanding desert recreation opportunities. The clear air quality permits one to see across the basin from the Absaroka and Wind River Mountains to the Big Horn Mountains. It is also home to two wild horse herds, the only sage grouse population in the state that is currently expanding, and crucial big game winter ranges for elk, bighorn sheep, mule deer and pronghorn, including some used by the Yellowstone herds. I urge you to develop a revised RMP that will:

· AESTHETICS:

Require phased leasing and development so that only a minority of the Basin can be committed to oil and gas drilling at any one time;

Mandate minimum-footprint directional drilling for all projects to reduce impacts;

· WILDLIFE PROTECTION

Require "No Surface Occupancy" for oil and gas development within 3

miles of sage grouse leks and in crucial big game winter ranges and calving sites;

Protect potential wilderness such as McCullough Peaks and Bobcat Draw;

· POLLUTION

Make public the compositions of all drilling and fracturing fluids used;

Minimize gas leakage impacts to the environment, require waste-water to be treated and re-injected to protect aquifers;

· CULTURAL

Require paleontological analyses prior to any construction or drilling activities at each well and road location.

In addition, Pursuant to 5 U.S.C. Section 555(e), I petition the BLM to extend the comment period for the Bighorn Basin RMP scoping process to allow the public sufficient time to have meaningful input into the process. Public participation and comments are an integral and critical part of the RMP process. Although the BLM is hosting 6 public scoping meetings, the deadline for the public to submit comments is November 17, 2008, only 3 days after the last public meeting. Three days does not give the public time to digest the many and complex issues of the Bighorn Basin and produce the detailed and thoughtful comments this important process requires.

Thank You for your consideration.
George Morris
20 Marquette Drive
Cody WY, 82414

1047

Eddie Bateson, Manager
Wind/River Bighorn Basin District
P.O. Box 119
Worland, WY 82401

Subject: Bighorn Basin RMP Scoping Process

Dear BLM Planners,

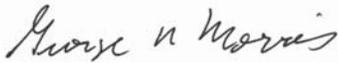
The Bighorn Basin is rich in cultural and historical resources, and outstanding desert recreation opportunities. It is also home to the only sage grouse population in the state that is currently expanding, and crucial big game winter ranges for elk, bighorn sheep, mule deer and pronghorn, including some used by the Yellowstone herds. I urge you to develop a revised RMP that will:

- Require phased leasing and development so that only a minority of the Basin can be committed to oil and gas drilling at any one time;
- Give notice when federal minerals are leased and require landowner approval of drilling and make public compositions of all drilling and fracturing fluids used;
- Mandate minimum-footprint directional drilling for all projects to reduce impacts;
- Require "No Surface Occupancy" for oil and gas development within 3 miles of sage grouse leks and in crucial big game winter ranges and calving sites;
- Protect potential wilderness such as McCullough Peaks and Bobcat Draw;
- Minimize gas impacts, require waste-water to be re-injected to protect aquifers; and
- Manage livestock grazing to ecologically sustainable levels.

In addition, Pursuant to 5 U.S.C. Section 555(e), I petition the BLM to extend the comment period for the Bighorn Basin RMP scoping process

to allow the public sufficient time to have meaningful input into the process. Public participation and comments are an integral and critical part of the RMP process. Although the BLM is hosting 6 public scoping meetings, the deadline for the public to submit comments is November 17, 2008, only 3 days after the last public meeting. Three days does not give the public time to digest the many and complex issues of the Bighorn Basin and produce the detailed and thoughtful comments this important process requires.

Thank You for your consideration.



George Morris
20 Marquette Drive
Cody WY, 82414

1049

"Charles R. Neal"
<ckrneal@bresnan.net>
11/12/2008 03:16 PM
To
BBRMP_WYMail@blm.gov
cc
Subject
Bighorn Basin Basin Resource
Management Plan Revision

To Bighorn Basin RMP Revision Staff
Attn: Caleb Hiner, RMP Project Lead

My comments are based on the belief that energy and mining development or livestock grazing must take place and only take place where they do NOT degrade the exceptional wildlife values of the Bighorn Basin. Where there is conflict between those commercial interests and wildlife values the management rule must be that: Public wildlife values must always take precedence over private commercial interests on Public Lands.

With that bottom line, it is imperative that---

(1) the crucial wildlife habitat along the fronts of the Absaroka, Beartooth and Big Horn be placed off limits to commercial development (essentially everything west of Hwy 120 is crucial wildlife habitat and vital to maintaining genetically viable, self-sustaining Yellowstone grizzly bear and gray wolf populations--two top-level carnivores that require large contiguous diverse landscapes in order to be self-sustaining).

(2) All Wilderness Study Areas along with Citizen's Proposed Areas should be given complete protection to protect their special values to the general public.

(3) Areas of Critical Environmental Concern (ACEC) should be given complete protection as well.

I appreciate this opportunity to comment.

Chuck Neal
1526 Alger Avenue
Cody, Wyoming 82414

1050



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: Jim Pedersen	E-MAIL:
ORGANIZATION:	
ADDRESS: 340 Trout Peak Dr	
CITY/STATE/ZIP: Cody, WY 82414	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11/12/08

Regarding the present BLM land North of Cooper Lane, North of Pat Oltava Mku Dr, with access through State land. Please continue use of it as is, i.e motorcycle, ATV, horseback & foot, for fishing, hunting, & hiking. Please, Never Trade it off, keep it BLM

Jim Pedersen

1051

DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT

2008 NOV 14 A 8:32

RECEIVED
WORLAND WYOMING

PO Box 58
Meeteetse WY

November 12, 2008

Bighorn Basin RMP,
Attn. Caleb Hiner,
PO Box 119,
101 South 23rd Street,
Worland, WY 82401

Dear Caleb Hiner,

The Bighorn basin will be better served if the environment, and the wildlife, which inhabit this wild and beautiful area, are not at risk because of development.

I am very concerned for the potential loss of wildlife habitat, from increased recreational use, over grazing of public lands, and energy development. I would like to see the protected range for the wild horses, and sage grouse expanded. I fully support Wilderness designation for all 13 Study Areas, and the 9 Areas of Critical Environmental Concern. I also support restricting all motorized vehicles to existing roads, and that only absolutely necessary additional roads are built.

Any future energy and mining development needs to be done in a way that protects the outstanding recreation, historical, paleontological, wildlife, and scenic values of the Bighorn Basin.

The crucial wildlife ranges on the fronts of the Bighorn, Absaroka, and Beartooth Mountains are too special to develop. These areas should be off-limits to energy, mining and other development, and maintained for their scenic, recreational, and wildlife habitat values.

Pauline Placzkowski
Pauline Placzkowski

1052

"DeLoyd"
<dq@rtconnect.net
>
11/12/2008 12:24
PM
Please respond to
"DeLoyd"
<dq@quarberg.com>

<BBRMP_WYMail@blm.gov>
To
cc
Subject
Scoping comments

Howdy BLM,

Here are my comments as an individual.

DeLoyd Quarberg
P.O. Box 1365
Thermopolis, WY 82443
Px: 307+864-5778
Fk: 307+864-5764
Email: dq@rtconnect.net (See attached file: Administrator.vcf) (See
attached file: BLM Scoping Issues-2.doc)

1052

BLM - Cody & Worland RMP Revision Comments 2008

General-

1. The plan must be governed by BLM's three criteria, 1- Multiple Use, 2- Sustained Yield, 3- Economic Impact. No special interest or single use shall have undue influence and must meet the three criteria.
2. The plan should emphasize management and good stewardship of the land so that natural resources can be used on a reliable and continuous basis in a multiple use program.
3. The BLM - RMP revision shall incorporate county land use plans per FLPMA (43 U.S.C. 1712, Section 202, C, 9).
4. The cumulative effect of restrictions and/or regulations must be considered so not to impeded the progress of and/or utilization of the resource in a manner that would render an objective economically unfeasible, such as reduction of time of use in segmented periods or time restrictions so short in duration that use becomes a financial obligation instead of profitable, creating a negative economic impact.
5. Aggressively participate in BMP projects brought forward by conservation districts, land owners and/or permittee's. Conduct EA's in a timely manner (30-60 days) so not to delay projects that are designed to improve the environment, sustain yield capability, wildlife habitat, water quality, air quality, or any other component of good land management.
6. Coordinate the BLM plan and all associated projects with local government (County Commissioners, Conservation Districts, Watershed Districts, etc) in those geographic areas to be effected.
7. There shall be no net gain in total BLM acres, preferably some of the isolated parcels that are insignificant and difficult to manage should be offered for sale at market value to the permittee first, then neighboring permittees and then the public. Those parcels that have private improvements (barns, sheds, etc), should be sold or traded to the person owning the improvements.
8. BLM should engage in a plan to assemble parcels that are non-contiguous into a block format by trading and/or selling land. Assembling land into larger blocks makes for more efficient management and control with less intrusion or regulation on private enterprise.
9. Permits, EA's, EIS's, etc, regarding production, harvesting or conservation practices that generate jobs, improve the habitat, and have an economic impact on the community, such as: gas/oil leases, drilling permits, timbering, water tank & pipe lines, spring development, reservoir improvement, etc, should receive priority attention so as to maximize the beneficial impact, economic as well as land enhancement.

10. Fire should play a beneficial role in habitat regeneration. Fire plans should be coordinated with local governments, conservation and watershed districts. Protection of critical and crucial habitats should have a high priority.

Special Areas

11. Area of Critical Environment Concern, ACEC, must first meet the definition requirements of FLPMA, 43 U.S.C. , 1702a, at this point in time. Current ACEC designated areas shall be reviewed to insure they do meet the criteria and those that do not shall be removed. The remaining designated ACEC areas must be limited in size and scope to the minimum necessary to specifically protect and prevent irreparable damage to values that are objectively shown to be relevant and important, or to protect human life, or safety from natural hazards. Damage must be shown in all respects to be truly irreparable and justified on short and long term horizons. ACEC must not be used as a substitute for a wilderness suitability determination, nor offered as a means to manage for so-called wilderness characteristics.
12. Any and all special designated “Wilderness Study Areas” shall be removed from that designation and reinstated in the general management area if nothing has been done with them in the past 10 years. To declare it a study area and then not study it, means it wasn’t important enough to be set aside in the first place. At a minimum, the area must be re-evaluated to ensure it meets the criteria for such designation.

Law Enforcement

13. Contract with and authorize County Sheriff Departments to enforce BLM regulations relative to the general public, such as illegal recreational use, vandalism, off road use, litter, etc. This would be more efficient and effective than employing additional BLM enforcement officers.
14. Provide trail markings to inform public of open and/or closed trails. Establish a working relationship with recreational groups or clubs to help maintain signs, etc.

Minerals

15. Do not restrict the development of minerals to the point the economic impact makes it financially unfeasible. Time periods of operation should not be limited to only a couple of months per year.
16. Streamline the permitting process to 60 days or less. The current permit time of 6mo to years is unacceptable and has a significant negative economic impact.

1052

Grazing-

17. Reinstate the AUM's that are being carried as suspended on the permits. Allow for flexibility in AUM use, to be determined between the BLM Range-Con and permittee based on forage availability.
18. There shall be no net loss in permitted AUM's, but the actual use may vary annually based on vegetative supply, weather and range conditions.
19. Streamline the process to refurbish reservoirs and/or install water tanks and pipelines across the land for the improvement of water distribution for livestock and wildlife.

Recreation-

20. Set aside a less productive area near towns for off highway vehicle, OHV, use as a playground. Allow for competitive type tracks or trails to be set up and an area for general riding and hill climbing. A condition could be for a local club to oversee and take control of the management, including clean up and general maintenance.
21. Set aside an area for a shooting range near each urban area. A condition of this may be contracting with a local gun club, sportsman club or similar organization for the management and oversight. The contract or lease should be long term, so a permanent type shooting range, club house, and/or equipment can be installed to insure the safe and responsible handling and use of firearms.
22. Establish and map nature trails and/or loop trails for recreationists & OHV, providing a more controlled use and coordinate that use with Sheriff Departments for enforcement oversight.
23. Include a OHV management plan, designated use areas, not use areas and designated trails. Plan should allow for permittee to use OHV in non-use areas for activities associated with the permitted use, such as installation, inspection, or maintenance of fencing, pipeline, livestock and any other use associated with the permitted activity.

Forestry-

24. Logging or timbering should be permitted on any and all timbered areas before fire is used as a management tool. The management plan should provide for a mosaic of seral stages, not for dominance of a particular age or species.
25. Include a variety of plans for effective pest, disease and insect management.
26. Timber harvest should be based on multiple use, sustained yield and economic impact

coupled with the goal for a healthy forest and improved habitat. Timber harvest should include the harvest of not only logs but firewood, Christmas trees, post & poles and other forest products commonly available to the public.

Vegetation-

27. Initiate an aggressive plan for the control of sage brush, noxious weeds and/or invasive species, using a combination of methods, including mechanical, chemical, fire, etc.

Water-

28. Work cooperatively and coordinate with the WY State Engineer Office regarding water issues, as they are the regulatory authority and legal owner of all water in the state.
29. Coordinate with county officials on any and all water issues relative to Coal Bed Methane discharge water, Oil field discharge water or any water extracted as a result of mining or mineral activity.
30. Work with the conservation districts to monitor, analyze, evaluate, improve and/or maintain water quality in the streams.
31. Allow mineral discharge water to flow over BLM land if requested by the downstream users and/or grazing lessee.

Wildlife-

32. Species of concern will be addressed but the decisions effecting them must be based on the best available science, not conjecture, supposition or guessing. Local watershed plans, conservation plans, grazing plans and mineral development schedules should be considered in depth.
33. Wildlife are an important part of the Wyoming landscape and a valuable asset to our custom, culture, and economic stability, especially the recreational industry. The population of each species should be managed in such a manner that they share the range with other multiple use applications, such as grazing and mineral extraction.
34. Species of concern should not be given priority just because there is no information on them. To assume they are threatened, endangered or in jeopardy without science would be irresponsible and could place, not only an undo hardship, but a significantly negative economic impact on the community, effecting its social and cultural environment.
35. Species of all types, animal or plant, disappear and new ones emerge over time in a

1052

natural evolution. Care must be taken to insure that unrealistic measures are not taken to protect a species destined for extinction naturally or new species are not mis-interpreted as rare and threatened or endangered.

Historical & Paleontological Resources:

36. Care should be taken to protect rare historical and paleontological resources when and where necessary for evidence gathering, study and historical purposes, but not all fossils finds contain significant deposits that should be protected forever. Care must be taken to balance or weigh the significance of each find and it's impact on the multiple use of the area.

Desired Conditions:

37. A landscape working in harmony in a multiple use concept, utilizing the renewable resources and extracting minerals, intertwined with recreational enjoyment for the benefit of all. A balance between nature and man, measured by the 3 criteria, of multiple use, sustained yield and economic impact.

Comments by

DeLoyd Quarberg
P.O. Box 1365
Thermopolis, WY 82443

1053

"Jeff Russell"
<j.jrussell82@gma
il.com>
11/12/2008 12:21
PM
caleb_hiner@blm.gov
To
cc
Subject
Access for organized shooting
groups

It's my understanding that an individual may go onto BLM land, find a safe place to shot and enjoy their time shooting. It is also my understanding that no organized groups, such as the gun club I belong to, are allowed on the land to practice their skills, or conduct classed as and organized group. We are the public, being restricted from public recreational land, and are willing to help preserve these areas. I don't understand this ruling and would like to see it changed. Would you enter this question into the RMP process.

Would you please respond to my question.

Thank you ,
Jeff Russell

1054



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: SKATES JACK T.	E-MAIL:
ORGANIZATION: RETIRED FORMER MAYOR AND BUSINESS	
ADDRESS: 1214 MEADOW LN AVE	
CITY/STATE/ZIP: CODY, WY	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11-12-08

Please leave McCougha area as is I want all the area for wild horses and wild game I believe oil exploration would effect this

Jack T. Skates



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

**Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401**

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov. All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: JOHN STAFFORD	E-MAIL: _____
ORGANIZATION: _____	
ADDRESS: P.O. Box 2684	
CITY/STATE/ZIP: CODY, WY. 82414	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11-12-08

I REALIZE THAT THERE ARE PREVIOUS DRILLING/ EXPLORATION SITES IN THE McCULLOUGH PEAKS AREA. HOWEVER, I AM AGAINST ANY FURTHER DRILLING IN THIS PARTICULAR AREA.

I AM VOICING MY OPINION AS A CITIZEN OF THIS COUNTRY AND AS A LONG TERM RESIDENT OF THE BIG HORN BASIN

1056



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: <u>Karla Stephens</u>	E-MAIL:
ORGANIZATION:	
ADDRESS: <u>901 Meadow Lane</u>	
CITY/STATE/ZIP: <u>Cody WY 82414</u>	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: Nov 12, 2008

The cascading effects of oil/gas/coal exploration/development are often severe when it is too late to change how they are done. It is therefore essential to limit negative impact on the land, animals, air, water + people. This can be done by not acting too quickly to allow large fields development, monitoring sites and enforcing regulations concerning air quality, water contamination, chemical containment. Currently at risk are native plants + animals i.e. Sage grouse + wild horse herds. There are really too many concerns to go over, so in general each area concerns are listed.
 Do NOT Allow Large Corporations to bully us into bad decisions. There are many areas which can be explored without threatening habitats, there are methods to reduce the impact of effluents produced. Exploration/development is inevitable but make them do it correctly - or make the fines prohibitive of repeat offenders. then make them pay the fines. Thank you

Written Comment Sheet

Public Scoping Meeting for the Bighorn Basin Resource Management Plan (RMP) Revision and Associated Environmental Impact Statement (EIS)

Thank you for your input!

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
Bighorn Basin RMP
ATTN: Caleb Hiner
P.O. Box 119
101 South 23rd Street
Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.

All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, **Caleb Hiner** at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: Lawrence Todd
ORGANIZATION: Colorado State University
ADDRESS: PO Box 70
CITY/STATE/ZIP: Meeteetse, WY 82433 ltodd@lamar.colostate.edu

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 12 November, 2008

I am concerned about the potential impacts of wildland fires on the regions cultural resources. Specific comments/suggestions of issues that might be considered in the Bighorn Basin RMP revision plan are attached.



THOUGHTS ON ROCKY MOUNTAIN FIRE-IMPACTS ARCHAEOLOGY

Central to any discussion of impacts of fire on heritage resource should be an emphasis on enforcement of existing preservation laws. While direct, immediate impacts of fires can be unpredictable with some sites being damaged, and others being exposed and providing exceptional research opportunities, the longer term impacts of increased artifact collection and site destruction are becoming an all too predictable consequence of fire. Although locations, extents, and intensity of fires are difficult to predict, it is becoming increasingly clear that an expected consequence of any fire will be the increased destruction and theft of heritage resources exposed or made more accessible by the fires.

Dealing with these expected humanly-produced destructive consequences need not wait until a fire has swept through an area, nor must they be dealt with on a reactive, case-by-case basis. A proactive emphasis on education and enforcement of existing legal frameworks can go a long way toward beginning to mitigate some of the more catastrophic impacts of fires. Three possible goals with suggestions on some of the objectives that might aid in their achievement are listed below. The first two goals can be undertaken immediately to help set the stage for more effective management impacts of future fires. The third goal addresses issues of post-fire evaluation, discovery, and mitigation.

Goal 1. Increase overall security of heritage resources.

At present, one gets the impression that “minor” infractions (e.g., collection of arrowheads, historic relics, etc.) can be undertaken with impunity. One of the greatest threats to resource security is a public perception that “its OK and nobody really cares anyway.” Comments by outfitters, grazing permit holders, trail crew members, and other Public land users and managers indicate a pervasive attitude that a blind eye will be turned on artifact theft and site damage, and that there is really little concern about such infractions. Pubic cultural resources are at risk in large part because there is limited, concerted effort expended in their active protection. Implementation and support for such effort needs to be made explicit and given high priority by all Supervisors.

Objective 1.1 Provide clear-cut statements on legal consequences of damage to heritage resources to Forest users and emphasize that such actions will not be condoned.

- Although casual visitors present a difficult audience, immediate increased signage and information at all trailhead and campgrounds is one, low investment way to begin.
- Permitted uses (grazing lease holders, outfitters, logging companies, etc), should all be sent letters from that makes it clear that as with other legal infractions, damage to sites or theft of heritage



Documentation of previously recorded site 10 months after moderate intensity burning of surface vegetation. While fire can cause some damage to exposed surface artifacts, one of the primary impacts is greatly increased artifact visibility.

resources by the permit holders, their employees, or clients will be sufficient grounds for rescinding permitted access to public lands and will be subject to criminal prosecution.

- All BLM personnel (permanent staff, seasonal temporaries, and volunteers) should be clearly informed that removal of artifacts has both legal and employment consequences.

Objective 1.2. Develop Statewide and Field Office hotlines for the public to report resource infractions similar to the programs used by the Game and Fish to encourage reporting of poachers. Perhaps develop a financial rewards program for information leading to arrest and conviction.

- Publication of hotline numbers in local newspapers and other local venues increases public awareness of the legal consequences.
- Makes the point that resources are being monitored and that there is the possibility that “somebody is watching”
- Emphasizes the importance of individual stewardship and concern.

Objective 1.3. Engage in aggressive enforcement of existing heritage resource protection laws.

- At present, infractions of are perceived has being inconsequential and having a near zero probability of prosecution – this needs to change.
- Arguably, since destruction and theft is taking place on all Field Offices, it should be possible for each Field Office to actively promote enforcement with a clearly stated objectives of achieving several arrests over the next year. One unambiguous measure of commitment to the process of resource protection that can be evaluated across Field Offices is a solid track record of arrests and convictions.



Increased post-fire artifact visibility increases the potential for site looting. This image is a group of children from an outfitters camp in being accompanied by an adult who was introducing them to “arrowhead collecting.” Many outfitters if not encouraging, at least condone, these illegal activities by their clients.

Goal 2. Develop systematic and quantifiable methods to monitor heritage resources and implement responses to degradation of resource condition.

Regardless of whether change in resource condition is fire induced or as the result of any other processes, having reliable, systematic information on the magnitude and nature of change is required to make any effective research and management decisions. At present, more effort is placed on survey and site discovery than on long-term management.

Objective 2.1. Identify key indicators of site condition. These might be archaeological equivalents of biological “indicator species” – items that could be very sensitive to theft -- or they could be measures such as surface artifact counts in standard sample plots, or they could be the presence of evidence of looting such as collector piles or pot holes.

Objective 2.2. Establish baseline data sets in a variety of unburned, recently burned, and likely to burn site settings.

Objective 2.3. Develop triggers (changes in site condition class) and responses. For example if some areas are experiencing severe loss of indicator artifacts, have an established set of management procedures established. These procedures should be conceptually comparable to those applied to other Public cultural resources. For example, if range condition deteriorate as a result of coupled climate change and existing stocking rate, it is not uncommon to reduce stocking rate. A comparable heritage resource response might be to first require all users of degrading areas to register, and if artifact removal continued, to move to access by permit only. If such responses were clearly defined, and publically known, they might act as an additional deterrent to site looting.

Goal 3. Implement multi-phase post-fire survey, monitoring, and response programs.

Soon after a fire is contained, known archaeological sites within the perimeter should be visited and reevaluated. In many cases, due to increased surface visibility, site boundaries, artifact assemblage size and composition, and number of site components will be markedly different after a fire than before. For sites with significant loss of surface vegetation, visits should be repeated as erosion and wind deflation has a high probability of further increasing surface artifact visibility.

Objective 3.1. Have agreements in place for professional, rapid post-fire assessment and have procedures for using initial assessment as a framework for next stages of survey and monitoring.

Objective 3.2. Anticipate secondary impacts and prepare procedures to effectively deal with them. For example, in areas with high densities of archaeological materials exposed by fire, the impacts of domestic animal grazing seem to increase dramatically. Once buffering surface vegetation is removed by fire, trampling can cause severe mixing, breakage, and damage to newly exposed archaeological surface scatters. Post-fire grazing impacts are much greater than pre-fire or several years post-fire impacts and need to be considered. Some grazing access might need to be restricted until vegetation regrows or potential damage to sites has been otherwise mitigated.

Objective 3.3. Consider post-fire assessment as a multi-phase operation that takes the rapid changes in site condition that can take place over a several year period into account. Given that site looting after fires seems to be becoming an increasingly severe problem, it may be beneficial to consider extending post-fire area closures or use restrictions until the potential damage to sites can be fully assessed and possibly mitigated.



Once surface vegetation has been removed by fire, otherwise relatively low impact processes, such as domestic animal grazing, can become high intensity, severe threats to exposed archaeological materials.

1058



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

**Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401**

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov. All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, **Caleb Hiner** at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: CHARLES TOWNSEND	E-MAIL: CTOWNSEND12@MSN.COM
ORGANIZATION: CITIZEN	
ADDRESS: 196 S Chugwater DR.	
CITY/STATE/ZIP: Cody WY 82414	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11/12/08

IF the gas drilling is using chemical-water pressure fracturing in the drilling process. Shouldn't the names and amounts of the chemicals and their purpose be public knowledge, since this is public land?

Problems may not show up for years and well spacing should be watched closely.

1059



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Who told
 US

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager,
Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME:	E-MAIL:
ORGANIZATION:	Concerned and
ADDRESS:	
CITY/STATE/ZIP:	Hostile

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522).
 Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

~~THANKS FOR THE NOTICE~~

Thanks for the notice on public comment for the development of **OUR PUBLIC LAND ON THE BASIN**, you or should I say they gave US a very short notice for public comment I wish you would give a better notice for comment let me say this, extend the public input to this viable concern, Do you think about us!! (I guess not) If it was not for the ad on the radio I would not have a give!!!

To express my feelings about the proposals for drill on the basin, will the state/FEDs be as lacks on pollution as you are now,!!!!

1059

BB RMP Scoping Comment Form
Comments must be received or postmarked by November 17, 2008

I really do not know who I am writing to, but please hear me, I may sound hypocritical but my soul found, yearly financial income, is from oil, gas, mining industry. I have witnessed numerous accounts of sadness as a human being, let me say again I feel hypocritical to say that the impact we face for development concerns me and others, **ON THE BASTN**

I have been in Wyo. for 15 plus years Campbell county coal industry, oil & gas Sheridan County should say all over the state for our natural resources. It is a royalty of resources for this beautiful, non populated, and slow develop.

My concerns in the development of gas on the basin, are this, slow, excess and development we **FUCKED** up the green River Basin by moving in a rapid pace. If your people believe in conservation, maybe you should **INFORCE IT**, please look at our mistake from pindale !!!!!?

That pisses me off, WHO TOOK THE **BREB** did BUSH PAY (who was responsible)

LOOK AT OUR LAND NOW & IF WE CONTINUE LOOK @ YOURSELF IN THE MIRROR **SELF**

I am glad a new administration

It sickin me that you give us 2 day for comment, good luck

1060

"Carol Austin"
<superiorequinesires@gmail.com>
11/13/2008 02:03 PM
BBRMP_wymail@blm.gov
BLM land use plan

To
cc
Subject

To Whom It May Concern:

In regard to the proposed plan for management of BLM lands, please consider my opinion.

I oppose increased permits for drilling for oil and gas, especially in sensitive wildlife habitat areas.

I oppose cattle grazing on federal lands. The west has been damaged enough by 200 years of cattle grazing. It's time for this entitlement program to end.

Cattle evolved on the soggy downs of Europe--they have no place in the arid west. They spread weeds far and wide, consume valuable wildlife forage and degrade any body of water they get near.

Only 2% of the nation's beef production comes from cattle grazed on federal lands--end cow welfare now.

If grazing on federal lands is not ended, then I support increasing the fees to a realistic level. In private sectors cattle grazing fees on average range from \$8 to \$15 per animal unit per month. My guess is that the grazing fee the BLM charges probably doesn't cover the cost of administrating the program.

In areas where wild horses live, and it is asserted they don't have enough feed, remove all cattle grazing permits from those areas.

I support the use of BLM lands for recreation, especially for non-motorized uses, with motorized use restricted to certain, nonsensitive areas.

I support the use of BLM lands for wildlife habitat.

I support continued energy development with existing permits.

Thank you for your consideration of my comments. Please reply to this email to acknowledge its receipt.

Sincerely, Carol Austin

www.SuperiorEquineSires.com
info@superiorequinesires.com
Carol Austin
610 Belfry Hwy
Cody, WY 82414
Ph/fax: 307-587-5105

1061

"Steve Bales"
<stbales@tritnet.net>
11/13/2008 08:32 PM
To: <BBRMP_WYMail@blm.gov>
cc:
Subject: Bighorn Basin RMP Revision

11/13/08

Steve Bales
stbales@tritnet.net
619 Diamond Basin Rd
Cody, WY 82414

I believe we should be a good steward of the land. We can use the land, but should not abuse it. The BLM lands are beneficial for many things to many people and with a little management will continue to be so.

Grazing on the BLM is very important to my ranch operation. Grazing livestock is managed to keep the vegetation in a health condition. Having a rotational grazing program allows plants to be grazed and also have time to rest. I think grazing is well managed now.

One thing that bothers me some people don't respect the land and drive every where and through trash out. It seems just because it is public land they think they can do anything. There are roads every where and people still drive off the roads and pretty soon there is another road. I would like to see some roads closed and stiffer fine the those people that drive off road. Litter is a problem every where, but the Red Lake area has some real trash problems. We need to do something, maybe stiffer fines.

The BLM provides a great deal of open spaces and habitat for wildlife. Common sense and science should play a big part in manage the wildlife. I think there is studies on just about everything, depending on who reading them they can be twisted to tell you just about anything. We need to remember some wildlife are very adaptable. There is a great deal of wildlife that thrive in agriculture and developed areas. Look how many mule deer live in the town of Cody.

Wild horses need to be managed to a responsible population. They can over graze and damage resources just like anything else.

I believe energy development should be allowed. There are many regulation in place to make sure things are done in a responsible manner. Our country is in need of more energy so we can become less dependent on the middle east.

So once again we need to be a good steward to the BLM land and manage it's resources in a responsible and common sense manner.

1061

Thank You,
Steve Bales

1062

"Judi Buckingham"
<jbuckingham@bresnan.net>
11/13/2008 03:28 PM
To: <BBRMP_WYMail@blm.gov>
cc:
Subject: BLM Land Use Plan

Good afternoon,
I would like to take this opportunity to make the following comments:
1. Where energy development is permitted, the strictest environmental regulations need to be enforced.
2. ATV use must be limited to the existing roadways.

Thank you for taking time to review my comments.
Gary Buckingham
307-754-5822

1063

Dave and Nena
Burke
<dnn@tritnet.net>
11/13/2008 07:37
PM

To
BBRMP_WYMail@blm.gov
cc
Subject
comments forBLM RMP proposed
revision - in text and by
attachment

November 13, 2008

Bureau of Land Management

Bighorn Basin RMP

ATTN: Caleb Hiner

PO Box 119

101 South 23rd St

Worland, WY 82401

RE: Comments for BLM RMP proposed revision

Cave and Karst Resources

Karst topography and caves deserve special protection, as these features can never be replaced or restored. All caves should have restricted entry, by gating, with accurate sign in sheets at the local BLM office, to control vandalism and mitigate impact with dust, caver travel, organic product and waste entry. The cleaner caves, such as Titan, Holey Sheep, and Tres Charros should have limited caver days in place, and allowed by prior application only. All grottos, with minimum of two, should be required to provide evidence of adequate caver equipment. BLM should provide a mandatory and certified caver safety and ethics class to any potential caver, with successful completion required before entry into any cave. Their certificate of completion should be shown at sign in to any and all caves. Cave trip leaders, chosen from known ethical cavers and grottos in the area, should be certified by the BLM and used to assure compliance and safety within the caves. These restrictions will still allow ethical caving, and provide protection of caves.

Trails and Travel Management

There are adequate improved roads in most, if not all of BLM lands in the Basin. There should be a severe restriction placed on any future improved road building. All motorized vehicles, including all motorized ORV vehicles should be required to stay on designated roads. Unacceptable damage to the land and vegetation occurs when vehicles leave the road. Wildlife is disbursed and stressed. Additional unauthorized roads are also created in this manner. Adequate enforcement methods should be included in this RMP. Roadless areas should remain roadless, when possible.

Minerals: Leasable oil and gas

Drilling should not be allowed in the McCullough Peaks area, due to the unique landscape including the archaeological and paleontological resources, the open space visual resources, Wilderness study areas, roadless areas, and fragile sagebrush steppe environment with considerable unstable areas.

Moderate drilling could be employed in other areas, where there presently are active oil or gas fields. Best available technology should always be utilized, including horizontal drilling, whenever possible.

Biological Resources: Riparian and Wetland, Invasive and Non-native

1063

Species, Wildlife, Special Status Species, Wild Horses

Riparian and wetland areas need special protection from roads, trails, motorized vehicle travel, pollutants, industry, construction, drilling and other mineral extraction, and any other unforeseen human caused activity. There should be no additional riparian or wetland area disturbance or destruction caused from human activity.

Invasive and non-native species - Prevent off road motorized vehicle use and continue to require certified weed free livestock feed. Use biological (insect) control of noxious weeds, if available and shown safe.

Wildlife reacts negatively to stress and loss of habitat. Human caused activity levels and habitat changes should be monitored and mapped. If a baseline has been established, then further changes could be minimized when necessary.

Special status species need special protection. The Wild horses should be included in this category. The above mentioned monitoring and mapping of human caused activity levels and habitat changes should be diligently employed for special status and wild horses. The horses, particularly, are susceptible to human activity, and, lose their wild nature.

Heritage and Visual Resources:

Cultural, Archaeological, Paleontological, and Visual Resources all need special protection. Any of these resources that are lost will never be recovered. All of these resources were created over eons of time, and cannot ever be replaced. The greater impacts from mineral extraction, including oil and gas, road building, pipelines, leachate ponds, etc., all have permanent effects with these irreplaceable resources.

Special Designations:

Areas of Critical Environmental Concern could be some of the areas mentioned above. Wild and Scenic Rivers, Wilderness Characteristics, and Wilderness Study Areas, should obviously be kept intact, with no human degradation allowed.

1063

With the new RMP, in all cases, the Best Available Technology should always be utilized with any mineral extraction or construction of any nature. In addition, Adaptive Management should be used in areas of change.

Thank you for your consideration.

Dave Burke

67 Partridge Lane

Cody, WY 82414

307-587-6702

dnn@tritell.net

(See attached file: RMP comments 111308.doc)

1063

November 13, 2008

Bureau of Land Management
Bighorn Basin RMP
ATTN: Caleb Hiner
PO Box 119
101 South 23rd St
Worland, WY 82401

RE: Comments for BLM RMP proposed revision

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1063

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With the new RMP, in all cases, the Best Available Technology should always be utilized with any mineral extraction or construction of any nature. In addition, Adaptive Management should be used in areas of change.

Thank you for your consideration.

Dave Burke
67 Partridge Lane
Cody, WY 82414
307-587-6702
dnn@tritnet.net

1064

Comments by Gerry Danko,
937 Lane 11 11/2
Powell, Wy 82435

BLM

Concerning wild horses: The \$37,000,000 to administer the wild horse program is terribly misspent. BLM must have the authority to sell off excess horses to any purpose. Horses need to become a commodity again and used to support the other free ranging horses. I might have to sell a cow to buy feed for the other cows. This is not space age economics. Perhaps the BLM can sell some horses for export to those societies that utilize horse meat.

A related problem would be that we need to get the kill plants open again to utilize the meat, profits which then could be used to support the free range horses. I understand that the Bureau has the authority to euthanize horses but simply to do that and waste them is absolute stupidity and I doubt that the Bureau would feel that they could kill horses in our present social temperment.

Other land uses: The open land needs to be accessible for hunting and sport shooting. We need to keep open the access for horse traffic for recreational riding and hunting. Sport vehicle utility users need to be educated to stay on the roads (fines if necessary) but be open to proper use.

We need to use the mineral and carbon deposits. The users must be closely monitored with a guaranteed cleanup by miners and oil and gas companies. But it must be utilized for the needs of the nation.



Board members: Marshall Dominick, President - Susanne Prodehl Forst, Vice President - Bettye Dominick, Treasurer - Ada Inbody, Secretary William Baker, DVM - Jack Machen – Kelli Maxwell-Benson - Warren Murphy

November 13, 2008

1

Bureau of Land Management
Bighorn Basin RMP
ATTN: Caleb Hiner
P.O. Box 119
Worland, WY 82401

Dear Mr. Hiner:

Thank you for allowing us this opportunity to comment during the public scoping for the revision of the BLM’s Bighorn Basin Resource Management Plan. The following comments are offered on behalf of FOAL.

Given the importance of the RMP to the welfare of the resources under the jurisdiction of the BLM, we feel that the scoping period should be extended so as to gather the optimal amount of public comments. Three to five days to produce thoughtful comments (that is the time from the BLM’s open house sessions in Cody, Powell, and Lovell and the end date for the scoping period) is simply not enough time for many folks. We would suggest a thirty day extension to the comment period.

It is our opinion that the revised RMP should be much more comprehensive than the existing RMP for the Cody Field Office, which is the operating document with which we have some familiarity. We believe it should specifically require that comprehensive base-line data be scientifically identified through the NEPA process prior to issuing permits, leases, special use permits, and the like. Said base-line data should provide detailed information about the following resources, where applicable: visual, soils, air quality, water quality (both surface and sub-surface), cultural, paleontological, wildlife (especially threatened and endangered species), wild horses, plants (especially rare, sensitive and threatened species), fish, invasive and non-native species, forests and woodlands, grasslands, sage-brush steppe, shrublands, solar, and wind. The current lack of information for some of these resources is disturbing.

The revised RMP should specify monitoring and compliance standards for all permittees and/or leasees who may impact the abovementioned resources. Like standards should apply to public and department impacts to the resources, as well.

We recognize that the collection of scientific base-line data, the monitoring of standards for resource management, and the enforcement of compliance to these standards all comes with a price tag attached. We believe the BLM should be proactive in initiating cooperative agreements with other public entities whose constituents are effected by this resource management. Sharing of base-line data could be of real value to such entities as the State of Wyoming, the Wyo. Game and Fish Dept., the county governments of Bighorn, Hotsprings, Park, and Washakie Counties, local municipalities, and local Chambers of Commerce. A cost-share program could be proposed, if the value of this base-line data is defined and established. We recommend that the revised RMP include directive to the managers to initiate such cooperative agreements with public entities. Furthermore, non-profit organizations with special interests (such as FOAL) should be given the opportunity to participate in a cost-share program. A substantial share of the cost should be borne by the permittees and leasees who receive the primary benefits from use of the resources.

Specific to wild horses and their habitat, which is a primary focus for our non-profit corporation, we would like the revised RMP to include stipulations which will ensure the health and longevity of the three wild horse herds in the Bighorn Basin. Those stipulations should include:

Page 2, Bighorn Basin RMP, letter from FOAL, 11/13/08

1065

1. A mandate to gather historic data to correctly define the herd areas as they existed at the time of the passage of the Wild and Free Roaming Horse and Burro Act of 1971 (Public Law 92-195). Once those historic herd areas have been defined, the three HMA's in the Bighorn Basin should be redefined, as is possible, to correspond with historic levels of size and habitat.

2. A comprehensive genetic study should be mandated for each of the three herds, with the goal of preserving defining genetics within each herd while at the same time preserving the genetic health (diversity) of each herd.

3. Given the unknowns about the use of PZP as a management tool, controlled studies of the use of this drug should be mandated and the results of these studies should be evaluated by a team of qualified experts (not necessarily BLM specialists) prior to use (or non-use) of this drug as a primary tool for controlling wild horse populations.

4. Appropriate Management Levels (AML's) should be re-evaluated for all three HMA's. AML's should not be permanently fixed; rather, they should be established upon scientific data which should include such information as the genetic viability of the herd, record of attrition within the herd (from predation, gathers, natural causes), range condition, and historic foaling rates. The RMP should provide some format for revising AML's, if appropriate, during the life of the RMP.

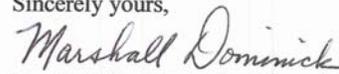
In addition, FOAL requests that Best Management Practices, as defined by the current Gold Book standards, and as amended in the future to remain current with new technology developments, be mandated in the RMP for all future mining and hydrocarbon extraction activities in the Bighorn Basin Resource Management area.

Enclosed please find copies of two letters which I have previously submitted on behalf of FOAL. The first letter was addressed to Ann Perkins of the BLM Cody Field Office on Oct. 3, 2008, as scoping comments for the Rocktober Unit Project. The second letter was addressed to Michael Stewart, Manager of the Cody Field Office on Oct. 8, 2008, and it is a petition to amend the current RMP for the Cody Field Office. These letters are provided so as to more clearly define FOAL's goals and background as well as to present our rationale for requesting that more comprehensive base-line data be required in the revised RMP.

Finally, please install some method in this revised RMP for review and further revision, as needed, every 7-10 years. This will help to ensure that the RMP does not become prematurely out-dated.

Thank you very much for your time and attention.

Sincerely yours,



Marshall Dominick, President of FOAL

Cc: Ann Perkins, BLM Planning and Envir. Coordinator, Park County Commissioners, file

1065

Some information with specific guide lines to include for letters or e-mails to the BLM on the Resource Management Plan(RMP) revision

The comment period for the RMP is much too short given all the public meetings being held in the Big Horn Basin. The importance of this document should be given an extension of at least a month to December 17, 2008. There are many very important factors to be considered by the public and the BLM. The new RMP when written will govern our public lands for many years – the BLM likes to say 20 years. The one in existence now is over 18 years old.

Twenty years is much too long for the RMP to be in use, considering how quickly our times are changing. A better time frame would be 7-10 years.

These are two very key issues the BLM should hear about.

The following are issues concerning the Mustangs in the McCullough Peaks that need to be addressed in the new RMP:

Expansion of the Herd Management Area(HMA) to the original and historic land that was granted to the horses and burros in the Wild Horse and Burro Act of 1971. Many HMA's have been "zeroed out" or taken away in favor of livestock and the oil and gas industries. The HMA's in the Bighorn Basin should be reestablished to their original size.

HMA's should be allocated for the primary use of horses not livestock, as specified by public law 92-195.

The impact that comes with the drilling of the gas wells in the McCullough Peaks will certainly disturb all wildlife that live in that area and the habitat they now enjoy. Removing the horses temporarily from the impact of the drilling, traffic, noise, etc. should be actively considered. This area should be comparable in size, range capacity, and water availability as the historic HMA.

The AML(appropriate management level) should be expanded to include at least 150 horses. The 110,000 acres should be able to sustain that number of horse especially if more water areas are made available. The AML could be further expanded if the HMA is enlarged to its original size. Following the 2004 gather, several harem bands were not turned back on their historic range, therefore a large portion of the HMA in the McCullough Peaks is not inhabited by horses today. This is a good management level for the three horse herds in the Bighorn Basin.

Mares from outside any HMA should not be brought into a specific HMA for breeding or any other purpose.

There should be no gelding of stallions of any age in and HMA.

There should be no gathers of the horses in the months from February to July due to the safety of the pregnant mares and newly born foals.

Yearlings should not be considered adult horses; the AML should be based upon adult horses, age 2 years or older, not yearlings that the BLM now considers adult horses.

Genetic testing should take place so the DNA of the horses in the McCullough Peaks will be known. Therefore, the horses can be removed scientifically and insure correct genetic ties for the horses returned to the herd

The use of PZP(contraceptive vaccine) should become a useful tool in controlling the horse population. However, there is some controversy about the use of the drug and also whether it should be used in a gather situation or field darting. More studies need to be done for more accurate statistics and highly trained and knowledgeable personnel should be included in these studies; not just BLM specialists or employees.

Helicopters should not be used in gathers. Just because they are used in every state does not necessarily make it the correct way of operating a gather, the least expensive or the safest for the horses

file 1065



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McCULLOUGH PEAKS MUSTANGS 1019 Meadow Lane Avenue, Cody, WY 82414 307-587-9449

Board members: Marshall Dominick, President - Susanne Prodehl Forst, Vice President - Bettye Dominick, Treasurer - Ada Inbody, Secretary
William Baker, DVM - Jack Machen - Kelli Maxwell-Benson - Warren Murphy

October 8, 2008

Mike Stewart, Field Manager
Cody Field Office
1002 Blackburn Ave.
PO Box 518
Cody, WY 82414

Dear Mr. Stewart:

This letter is addressed to you as a formal petition to amend the current Resource Management Plan for the Cody Resource Area of the Bureau of Land Management.

We are sending you this letter to notify you of significant changes that have occurred on the ground in the Bighorn Basin, specifically in the McCullough Peaks, and in the field of energy exploration technology. These changes are **not** anticipated by, or addressed under the existing Cody Resource Area Resource Management Plan.

Our reason for submitting this petition is that the Resource Management Plan (hereafter referred to as the RMP) is out of date and inadequate to protect against irreparable and significant damage to BLM resources under your jurisdiction (hereafter referred to as "the Resource").

It is our understanding that a complete revision of the RMP, which we were told was first expected to begin over four years ago, is now scheduled to begin in October, 2008, and that it may not be finalized for possibly four years. In the meantime the Cody Field Office will continue to operate under guidelines and regulations set forth in the current RMP which was finalized by Record of Decision (hereafter referred to as ROD) on November 8, 1990.

Visual Resources

The importance of visual resources is difficult to quantify, but clearly the concepts of viewsapes and open space have changed significantly since 1990. The concept of open

lack of development. The Bighorn Basin also contains crucial winter habitat for big game species such as elk, mule deer, antelope, and bighorn sheep. It is vitally important that studies are done to assess habitat quality and wildlife numbers prior to the implementation of any new projects.

The high desert ecosystem, a dominant feature of the Bighorn Basin, contains a wide variety of native plant species. The sagebrush steppe community is the most dominant plant community in the Basin and is critical for the survival of sagebrush obligate species such as sage grouse, Brewer's sparrow, sage sparrows, and sage thrashers.

Many areas within the Bighorn Basin, such as the McCullough Peaks, fall within one of the Core Areas identified in Governor Freudenthal's Greater Sage-Grouse Core Area Protection executive order, #2008-2, issued on August 1, 2008. Gov. Freudenthal's Executive Order stems from information obtained through recent extensive studies of the greater sage-grouse in Wyoming. Documentation from the studies identify Core Sage-grouse Breeding Areas. As such, protection of these areas has been designated by Wyoming Sage Grouse Commission, and the US Fish and Wildlife Service as critical for maintaining healthy sage grouse populations in Wyoming. Much of the land identified as core areas falls under BLM jurisdiction. The BLM should take the lead in protecting sage grouse and avoid having the birds listed as endangered species.

Energy Development

The field of energy exploration and development has grown by leaps and bounds in the past twenty years. High energy prices have raised the bar on resource extraction, allowing companies to drill for natural gas in ways that were technologically and economically unfeasible when the Cody RMP was written. As a result, the Cody Resource Area RMP does not take into account unconventional resource extraction development scenarios and effects.

The Cody RMP gives very little detail or guidance regarding energy development in the Bighorn Basin beyond a rough, simplistic map depicting hydrocarbon potential and oil and gas fields. There is no specific reasonable foreseeable development scenario and no discussion of the impacts, scale, or methods of development. In addition, the RMP gives no standards or guidelines for full-field development. In *Pennaco Energy Inc. versus The Department of the Interior* the 10th circuit court of appeals ruled that because the Buffalo BLM office's RMP did not have any discussion of the effects of coalbed methane (CBM) drilling it was required to prepare a new EIS prior to leasing lands for CBM. Likewise, as the Cody RMP does not address the effects of unconventional resource extraction it must take a "hard look" and amend its RMP prior to allowing such development to commence.

The energy industry has long believed that the Bighorn Basin contains gas reserves that can only be accessed via unconventional drilling techniques such as tight-sands gas

extraction². Unconventional gas development, specifically tight-sands plays, currently produces more natural gas in the United States than conventional on or off-shore drilling³. Industry experts predict that the Bighorn Basin contains 550 billion cubic feet of technically recoverable natural gas⁴. Scot Donato, Environmental Health and Safety Manager for Bill Barrett Corporation has stated that Bill Barrett Co. expects that full field development of the Rocktober Federal Unit alone could possibly yield 480 billion cubic feet of gas. Drilling for gas in tight sands differs radically from conventional natural gas development. The gas is “locked up” deep underground in sandstone formations that must be fractured in order to extract the resource. This frac’ing requires many more chemicals, rigs, and vehicles, and much more water and energy than conventional drilling. In addition, because production of a frac’ed well usually drops over 50% in less than one year, new wells must constantly be drilled to keep up field production⁵. In the Rulison field in the Piceance Basin of Colorado (where Bill Barrett Corporation and other companies are drilling in the Mesa Verde formation, just as is proposed in the Bighorn Basin) well spacing was originally 160 acres and has been decreased to 80 to 20 and now is at 10 acre spacing. The impacts that result from this aggressive type of field development include the conversion of habitat and open space to well pads and dust, air pollution, and noise from heavy truck traffic.

These figures and examples, and the role of unconventional resource extraction in our domestic energy market, show that the Cody BLM office may soon be confronting large-scale energy development in the Bighorn Basin in a manner not addressed in the current RMP.

Air and Water Quality

In Sublette County, Wyoming there were no comprehensive baseline studies to examine air or water quality prior to the initiation of full field energy development. Now there is ozone pollution, hydrocarbons in the aquifer, elevated acid levels in alpine lakes, and various human health issues as a result of the extensive energy development that has occurred on the Pinedale Anticline and Jonah Field.

² Johnson, Ronald C. and Finn, Thomas M. 1998. Is There a Basin-Centered Gas Accumulation in the Upper Cretaceous Rocks in the Bighorn Basin? Wyoming Geological Association Forty-Ninth Guidebook: 257-266.

³ Kuuskraa, V. A., Godec, M. L., and Reeves, S. R. 2007. Outlook for Unconventional Gas: The Next Decade. Advanced Resources International, Inc. White Paper, Unconventional Gas Series. Accessed online, 9/19/08, http://www.advres.com/pdf/ARI%20OGJ%206%20Unconventional%20Gas%20Next%20Decade%207_24_07.pdf

⁴ Kirschbaum, et al. 2008. Assessment of Undiscovered Oil and Gas Resources of the Bighorn Basin Province, Wyoming and Montana. U.S. Geological Survey National Assessment of Oil and Gas Fact Sheet.

⁵ Riestenberg, D., Ferguson, R., and Kuuskraa, V. A. 2007. New and Emerging Unconventional Gas Plays and Prospects. Advanced Resources International, Inc. White Paper, Unconventional Gas Series. Accessed online, 9/19/08, <http://www.advres.com/pdf/ARI%20OGJ%20Rev%203%20Unconventional%20Gas%20New%20and%20Emerging.pdf>

Here in the Bighorn Basin gas development has led to a host of environmental and human health problems as well. Energy development in Clark has been fraught with mishaps and disaster. A 2006 well blowout contaminated the local aquifer (and the private wells that draw from it) and Line Creek. The blowout also released massive amounts of methane into the air, causing respiratory problems for the citizens who live in the Line Creek Wilderness Subdivision. Operator misconduct has further endangered the lives of nearby residents throughout the course of development in the area. As in Sublette County, no baselines studies were done prior to development, making it very difficult to ascertain the exact costs to human and environmental health resulting from energy exploration and production.

Without baseline studies to compare with it is difficult to determine the exact changes and problems associated with development. The Cody BLM office can learn from the mistakes that occurred in Sublette County and in Clark and establish baseline information prior to permitting any new development.

Petition

It is our considered opinion that unless the following amendments to the RMP are enacted, the resources under your jurisdiction are going to be significantly and irreparably damaged.

Furthermore, it is our considered opinion, in order to protect the Resource, that said amendments must be addressed during the information gathering phase for any current or future project and must be enacted prior to the issuance of pending or future ROD's. Refer specifically to current scoping for the Rocktober Project as an example.

Therefore, we also petition you to place a Moratorium on any ROD from your Cody Field Office until such time as you have ruled on our petition to amend the RMP.

We believe visual, wildlife, air quality, water quality, recreational, and paleontological resources are in jeopardy at this time. We petition that the following amendments be incorporated in the RMP.

In light of these significant changes, we petition BLM pursuant to 5 U.S.C. § 555(e) to take the following measures to amend the Cody Resource Management Plan:

1. Redefine and quantify the visual resource management criteria for classifications in all project areas under scrutiny through the NEPA process. Specifically, define "open space", as it relates to the visual resource. Re-classify specific project areas per these new definitions prior to issuing a ROD.
2. Require site-specific, comprehensive baseline studies for archeological and paleontological resources prior to any ground disturbance. Set appropriate operation compliance standards relating to all archeological and paleontological

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resources in a given project area. Require monitoring per these standards of Class 3, Class 4, and Class 5 sites by a certified paleontologist and certified archeologist, as appropriate, during the entire course of all ground-disturbing occurrences during the life of the project. Specify BLM's actions to be taken in the event of non-compliance, including specific penalties and time-lines to be imposed upon the operator until such time as the operations are brought into compliance.

3. Require site-specific, comprehensive baseline studies for any threatened, endangered, or sensitive species found within any project area for review prior to any ROD. Set appropriate operation compliance standards relating to any and all pertinent species of wildlife. Require monitoring per these operation compliance standards for the life of the project. Specify BLM's actions to be taken in the event of non-compliance, including specific penalties and time-lines to be imposed upon the operator until such time as the operations are brought into compliance.
4. Revise the Reasonable Foreseeable Development scenario for oil and gas development in the Bighorn Basin to account for changes in technology that now allow for unconventional resource extraction such as tight gas sands development.
5. Require site-specific, comprehensive baseline studies for air quality and how it relates to human health in any project area during the NEPA process and prior to the issuance of a ROD. Set appropriate operation compliance standards relating to any and all air quality issues. Require monitoring per these operation compliance standards for the life of the project. Specify BLM's actions to be taken in the event of non-compliance, including specific penalties and time-lines to be imposed upon the operator until such time as the operations are brought into compliance.
6. Require site-specific, comprehensive baseline studies for water quality and how it relates to human health, during the NEPA process prior to the issuance of a ROD. Set appropriate operation compliance standards relating to any and all water quality issues. Require monitoring per these operation compliance standards for the life of the project. Specify BLM's actions to be taken in the event of non-compliance, including specific penalties and time-lines to be imposed upon the operator until such time as the operations are brought into compliance.

In conclusion, we petition you to consider each of these amendments on their individual merit, and that you rule on each recommended amendment accordingly. Please provide your response to this petition in writing in advance of the issuance of the Environmental Assessment for the Rocktober Unit drilling project. Thank you for your attention to this issue.

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Sincerely yours,

Marshall Dominick
President, Friends of a Legacy

Signing on behalf of

Hilary Eisen
Greater Yellowstone Coalition
1285 Sheridan Ave., Suite 215
Cody, WY 82414
(307) 527-6290

Donna Haman
Meadowlark Audubon Society
PO Box 593
City, WY 82414
(307) 587-4190

Kevin Lind, Director
Powder River Basin Resource Council
934 North Main
Sheridan, WY 82801

David H. Haire, Chair
Clark Resource Council
920 Road 1AB
Clark, WY 82435

John Fenton, Chair
Pavillion Area Concerned Citizens
202 Indian Ridge Rd.
Pavillion, WY 82523

cc: Don Simpson, Wyoming BLM State Director (acting)
Jim Caswell, BLM National Director
Eddie Bateson, Worland BLM Field Manager
Kim Jones, Cody Chamber of Commerce Director
Rinda Coons, Powell Chamber of Commerce Interim Director
Park County Commissioners
Ryan Lance, Deputy Chief of Staff for Governor Freudenthal
Karen McCreery, Field Representative for Senator Enzi
Pam Buline, Field Representative for Senator Barrasso

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McCULLOUGH PEAKS MUSTANGS 1019 Meadow Lane Avenue, Cody, WY 82414 307-587-9449

 Board members: Marshall Dominick, President - Susanne Prodehl Forst, Vice President - Bettye Dominick, Treasurer - Ada Inbody, Secretary
 William Baker, DVM - Jack Machen - Kelli Maxwell-Benson - Warren Murphy

October 3, 2008

 Ann Perkins
 BLM Planning and Environmental Coordinator
 P.O. Box 518
 Cody, WY 82414

 Comments: **Bill Barrett Corporation**
Rocktober Unit Project

 Name/Organization: **Friends Of A Legacy (FOAL)**
 Marshall Dominick, President

 Address: 1019 Meadow Lane Avenue
 Cody, WY 82414

Dear Ms. Perkins:

Friends Of A Legacy — McCullough Peaks Mustangs (FOAL) is a non-profit corporation established in 2005. FOAL's 160-acre property is adjacent to the McCullough Peaks Herd Management Area, an area that will be dramatically impacted by the Bill Barrett Corporation Rocktober Unit Project (Rocktober Project). FOAL's current and future plans call for the development of a National Wild Horse Education and Interpretative Center to be located on the FOAL property. The FOAL Center will serve local communities in Wyoming as well as the thousands of tourists who visit the area each year. Among these are school children, conservation groups, environmental organizations, wildlife and wild horse enthusiasts, archaeologists, paleontologists, geologists and more.

- One of FOAL's primary goals is to protect and enhance the McCullough Peaks Herd Management habitat. Achieving FOAL's mission is contingent on the success of this primary goal.

We believe that the proposed Bill Barrett Corporation, Rocktober Unit Project will have a significant negative impact on the McCullough Peaks Herd Management Area's fragile environment and its surroundings. In this regard, FOAL wishes to go on record as being *opposed* to implementation of the Rocktober Project until the following concerns are addressed and evaluated through *quantitative* studies. Such studies will enable all concerned to cooperate in minimizing the additional detrimental effects of the Rocktober Project that are not anticipated in the BLM's Resource Management Plan, Best Management Practices Initiatives (BMP), or the Gold Book (BLM & USFS). The letter herein addresses the following key issues.

1

Key Issues

Amend the 1990 Resource Management Plan (RMP)

- The BLM's RMP is an 18-year old document which does not adequately reflect the current environment and available technologies of the 21st century. Amendment and revision to the BLM's 1990 RMP is essential to ensure agreement with the Environmental Best Management Practices as defined in the Gold Book (BLM-USFS) 2007 chapter 1, page 2, "Environmental Best Management Practices."

Perform Quantitative Baseline Studies

Baseline studies use a range of methods to establish a starting point for projects. They provide valuable environmental and economic information that is critical for project decision-making and to predict impacts. Such studies, which must be conducted prior to implementing the Rocktober Project, include the following environmental and biological resources impacts:

Topography/Water

- The McCullough Peaks is a fragile environment to which significant impacts to topography and water resources are expected from deep-well and high pressure hydraulic fracturing (sometimes known as "frac'ing") technologies.

Air Quality and Safety

- Significant project-specific and cumulative air quality impacts are anticipated to the health and safety of populations in and around the project area. A detailed analysis of air quality effects (conducted prior to the implementation of the Rocktober Project) is essential.
- On February 27, 2008, The Wyoming Department of Environment Quality (DEQ) issued an Air Pollution Advisory: Ozone for Sublette County (Pinedale/Jonah region). The following is excerpted from that advisory:

The Air Quality Division of Wyoming's Department of Environmental Quality is issuing an air pollution advisory beginning Wednesday, February 27, for the Upper Green River Basin, in Sublette County. The advisory is for ozone, which is an air pollutant that can cause respiratory health impacts. The Air Quality Division advises that people in sensitive groups should avoid strenuous outdoor activity when eight-hour ozone values are between 85 and 105 parts per billion.

Elevated wintertime ozone is an unexpected occurrence that is being studied by the Division. In the past week, the highest eight-hour ozone levels at the Division's monitor at Daniel was 76 ppb, the highest at the Jonah monitor was 85 ppb, and 122 ppb was reached at the Boulder monitor.

- Clearly, the DEQ believes that the presence of oil and gas operations in the region are responsible for the unexpected occurrence of dangerous levels of ozone in Sublette County.

Soils

- Multiple soil map units occur in the McCullough Peaks Herd Management Area all of which may have construction and reclamation limitations. Significant impacts to soils in the project area are anticipated; therefore, comprehensive site-specific soil analyses must be quantified *prior* to implementation of the Rocktober Project.

Wildlife and Wild Horse Impacts

- Significant impacts to various wildlife habitats and wildlife populations are anticipated as a result of oil and gas development activity. Wildlife that occurs in the McCullough Peaks Herd Management Area include pronghorn antelope, greater sage-grouse, raptors and many other BLM Wyoming Sensitive (BWS) species (most notably sagebrush obligates).
- The federally mandated McCullough Peaks Mustang herd is among the animal populations that will certainly be impacted by the proposed Rocktober Project.
- Specific quantitative baseline studies must be conducted prior to implementing the Rocktober Project. From these studies specific objectives for wildlife protection and restoration of habitat function through reclamation must be set forth in extreme detail.

Plant Cover

- Plant cover values vary in the McCullough Peaks Herd Management Area with significant impacts from the Rocktober Project expected in many areas. To mitigate the potential impacts, a Reclamation Plan for the project must be required for *all* development alternatives prior to initiating the Rocktober Project.

Cultural & Paleontological Impacts

The Rocktober Project area has a Class 5 classification under the Potential Fossil Yield Classification (PFYC) System. Class 5 is the highest classification with a “high probability for impacting significant fossils”.

- Significant impacts to historic resources, including archeological and paleontological, are certain to occur as the result of oil and gas development. According to the BLM’s Gold Book “*such impacts are mitigated through data recovery and/or avoidance of significant properties.*”
- Clearly, baseline studies to identify all cultural and paleontological resources in the impact area *must* be completed prior to implementing the Rocktober Project.

Visual Resources

- The importance of visual resources may be difficult to quantify, but clearly the concepts of viewscales and open space are becoming more and more a part of

modern perception. Areas where the view is unimpeded or not distracted by man-made phenomenon can be defined as “open space”, and can be quantified per the distance from, the size, and the amount of man-made objects that can be seen from a given point.

- Open space should be defined, and a baseline analysis of open spaces within the project area should be provided prior to implementation of the Rocktober Project.

Strict Compliance with Best Management Practices Initiatives

The Rocktober Project must comply with all aspects of the BLM’s current Best Management Practices Initiatives, as well as those identified from the previously detailed key issues. In the past, BLM has demonstrated a reluctance to require compliance with all Best Management Practices and mitigation measures prior to proceeding with the process of oil and gas development. This practice is unacceptable.

- For example, Wyoming Governor Dave Freudenthal recommended to the BLM that baseline studies for such things as water quality, air quality and wildlife habitat be completed prior to development of gas fields in Sublett County, WY. The baseline studies were not completed; thus, the opportunity for doing such studies was lost.
- Now is the time for the BLM to recognize its past mistakes and take measures to ensure that these mistakes are not repeated.

Conclusion

In conclusion, FOAL believes the proposed Bill Barrett Corporation, Rocktober Project will have a significant negative impact on the McCullough Peaks Herd Management Area’s fragile environment and its important wildlife and wild horse populations; plant cover; topography, water and air quality; and, cultural and paleontological resources.

FOAL *opposes* implementation of the Rocktober Project until all the concerns herein are addressed and evaluated through *quantitative* studies and in compliance with the BLM’s RMP, Best Management Practices Initiatives (BLM), or the Gold Book (BLM & USFS). We suggest that the BLM’s antiquated 1990 RMP be amended to reflect today’s critical issues and advanced technologies.

Thank you for your prompt attention to this matter.

Sincerely,

Marshall Dominick, President
Friends Of A Legacy — McCullough Peaks Mustangs (FOAL)

1066

"Ev Dunklee"
<olyspokellc@aol.com>
11/13/2008 11:26 PM
To
<BBRMP_WYMail@blm.gov>
cc
Subject
Comment for Bighorn Resource Management Plan

Everett Dunklee
Resident Big Horn County
Box 66
Shell, WY 82441

13 November 2008

Comments - Bighorn Basin Resource Management Plan Revision

Thank you for your excellent and very informative presentation in Powell, WY this evening. I appreciate your efforts to develop a balanced Resource Management Plan Revision.

Foremost I desire development on public lands be minimized to the maximum extent possible. In my view the Big Horn Basin is a stunning example of open space, solitude, ecosystems, geology, archeology and paleontology. It's remoteness hides value even to people that reside here. Let us not suffer hubris to think we can extract mineral wealth in exchange for abstract monetary numbers without consequence.

It is naïve to say resource infringement can be halted. It is also naïve to take from the land and not give something back. Enhanced application of reclamation may provide palatable solution. This requires more stringent accounting of resource prior to extraction, stricter oversight of process, and stronger protocols for bond release. If profit is generated from public treasure, let more profit be extracted dedicated totally to amelioration of land extraction. Our ongoing public trust relative future generations requires better quid pro quo.

My work requires visits to land "reclaimed" in previous mining endeavors. There is method improvement over time. If more monies can be allocated from current mining operations, perhaps even better method can be applied / researched for ongoing restoration. And perhaps older poorly reclaimed sites can be revisited with new methodology.

And if that is not successful, why not use old unpalatable reclamation sites for development of solar energy application. This additional

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development would not be pleasing with regard to the Big Horn Basin, but United States power needs can be met using solar and other green technology. Evaluations show this process can impact fewer acres of land than current energy mining extraction. With proper development and increasing efficiency of solar methods perhaps better balances can be attained. Perhaps old oil wells can be incorporated into geothermal heat pumps. These may be pipe dreams, but why not use this time and this plan as a test bed for new ideas. I personally will feel better looking at my kids and saying at least we tried.

Thank you for your considerations,

Yours truly,
Ev Dunklee

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Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: BRUCE FAUSKEE	E-MAIL:
ORGANIZATION:	
ADDRESS: 575 Rd 12	
CITY/STATE/ZIP: POWELL, WY	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11/13/08

- ① Enforce rules established on mineral leases (Don't give variances)
- ② Don't lease established sage grouse core areas
- ③ Improve range and riparian area by ~~reduce~~ conditions
- ④ provide more ~~en~~ enforcement for off-road & ORV's offences

1068

Donald Gerber
<earlkann@msn.com
>
11/13/2008 11:24
PM

<bbrmp_wymail@blm.gov>
To
cc
Subject
BLM Resources Bighorn Basin RMP
revision

Donald Gerber
earlkann@msn.com
Rock Brawlers 4wheel drive club
9083 Limecrest Dr
Riverside, Ca 92508

BLM Resources Bighorn Basin RMP revision.

Though I am not a local resident, I am an OHV enthusiast and the alarming rate of public land closures requires that I make a personal effort to keep OHV opportunities wherever I may some day wish to travel. Many people have been using the Big Horn Basin as an area for OHV's for as as many as 50 years. Some of these routes are roads that OHV'ers have adopted and prescriptively used as destination trails. These routes, in many cases, predate the existence of the BLM, and we contend that the BLM has no right to close the original roads trails that have been used by the public, uninterrupted for 130 years (in some cases).

They lead to vistas, scenic byways, creeks and primitive camping. We contend that all of these routes are valuable, as they are being used to access some type of needed or wanted resource. These trails have not been proven to affect water quality, habitats, or plants. What they are is a road that the BLM cannot afford to manage. Management is not closure. These roads all need to be analyzed individually for their value, and included into the BLM System until this has been accomplished.

The BLM has decided not to designate routes leading to private property, traversing private property, or exiting private property. BLM has also stated that the burden of permitted access to these types of trails will be on the user. We as users will not have the ability to gain permission to cross private property if there are no trails designated to private property. These trails need to be designated until access or easement has been denied by private property owners.

Four wheel drive owners do not want to loose this valuable resource. They use these areas for recreation. Four wheel drive owners build their

1068

vehicles to traverse extreme terrain. Most of the time the BLM closes trails because they cannot traverse the terrain in the stock vehicles. OHV's do not feel it is fair to shut down these trails and roads or designate them as only for 4 wheelers just because a car cannot drive over the trail or road.

OHV's do not approve of adding more area to the already large Wilderness Study Area. This land has been set aside for over 20 years. We feel this land should be opened up again to the Public and off road vehicle travel.

There are 4 wheel drive enthusiasts that spend a great deal of time and money preparing their rigs for the winter. Bead-lock wheels are the most expensive equipment used. The wheels lock the bead of the tire to the wheel, so when the tire is aired down and left with 2-3 lbs of air, the tire will stay on the wheel. The purpose of this is to create a wide footprint which greatly enhances traction in the snow by allowing the vehicle to "float" on top of the snow. It prevents the tires from "digging" into the snow, and also helps prevent tread damage to roads that may have 24-36" of snow pack. The trick to staying on top of the snow is slow steady throttle, which much like the nature of rock crawling reduces the risk of resource damage. Many purchase wider tires as well to aid in deep snow travel.

Thank-you

Color coding for safety: Windows Live Hotmail alerts you to suspicious email. Sign up today.

1069

Donald Gerber
<earlkann@msn.com
>
11/13/2008 11:33
PM

<bbrmp_wymail@blm.gov>

To
cc
Subject

To Whom it May Concern

I would like to file for an extension on this planned Resource Management Plan Revision.

Public Notification was not given over the radio, or seen in any newspapers.

At the meeting in Powell tonight, we could not obtain any documentation of the plan or it effects to land users and the public. Maps of proposed changes were not provided. We asked for maps and documentation but were not given any.

We would like an extension for more public notification of the changes proposed by the BLM and for the lack of Documentation of changes.

Thank-you

Donald Gerber

Get 5 GB of storage with Windows Live Hotmail. Sign up today.

1070

"Craig G"
<roktgr@gmail.com
>
11/13/2008 10:58
PM
BBRMP_WYMail@blm.gov
cc
Subject
BLM Resources Bighorn Basin RMP
revision.

These comments are regarding the recent announcement of a proposed trail management system by the BLM land office for the Bighorn Basin Area. Current this area is used by Off-Highway Vehicles (OHV) for recreation and land access for over 50 years. Many of these trails or roads have become designated routes and even predate the BLM organization. BLM has stated that they are not able to manage these routes and would rather close them then allow OHV use to continue.

This is a mistake. Many OHV user are not looking for a maintain route or trail, as they enjoy the challenge that nature provides. These routes also lead to vistas, scenic byways, creeks and primitive camping. We contend that all of these routes are valuable, as they are being used to access some type of needed or wanted resources.

BLM should work with the local OHV users and clubs to identify any resource damage or sensitive areas and together provide a solution that benefits both sides. Closing routes only provides benefits to one side. Our clubs give great effort in reducing our impact by following Tread Lightly practices and avoiding resource damage so that we can keep our routes and trails open. We work with the Forest Service and BLM offices to promote responsible OHV use, enforce land use regulations, and assist with land use cleanups and maintenance programs. Public land should stay open for responsible public use.

Thank You.

Craig Grunenfelder
Roktgr@gmail.com
Black Hills 4 Wheelers
3615 West Main St
Rapid City, SD 57702
11/13/2008

1071

"Craig G"
<roktgr@gmail.com
>
11/13/2008 11:39
PM
BBRMP_WYMail@blm.gov
To
cc
Subject
BLM Resources Bighorn Basin RMP
revision.

To Whom it May Concern

I am disappointed by the lack of public notification of the changes proposed for the Bighorn Basin OHV use. In dealing with our local Forest Service district and BLM offices notices about proposed change are annouced months in advance, local clubs and usere input for the changes is gathered and listened to, comment periods are open for several weeks, and documentation and maps of the proposed changes are made available. None of this was done with the perposed changes for the Bighorn Basin area. I think an extension on this planned Resource Management Plan Revision is the only fair action to take. Local clubs have noted the following:

Public Notification was not given over the radio, or seen in any newspapers.

At the meeting in Powell tonight, we could not obtain any documentation of the plan or it effects to land users and the public. Maps of proposed changes were not provided. We asked for maps and documentation but were not given any.

This does not seem like a professional or responsible method in which to implement desicion that will effect public use of BLM for a great many OHV users. I would hope that an extension would be granted, the proper public notification through the local media be taken and informatinve documentation be provided to OHV users.

Thank You.

Craig Grunenfelder
Roktgr@gmail.com
Black Hills 4 Wheelers
3615 West Main St
Rapid City, SD 57702
11/13/2008

1072

Rec



Written Comment Sheet

Please submit this comment form in person or by mail on or before **NOVEMBER 17, 2008** to:

Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager, Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: Rick Harrison	E-MAIL: rharrisoa28@yahoo.com
ORGANIZATION: -	
ADDRESS: 797 Hwy 14	
CITY/STATE/ZIP: Powell WY	

Comments submitted to BLM for use in this planning effort, including names and home addresses of individuals submitting comments, are subject to disclosure under the Freedom of Information Act (FOIA) (5 U.S.C. 522). Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, public comments submitted, including names, e-mail addresses, and street addresses of respondents, will be available for public review at the BLM Worland Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday (except federal holidays).

PLEASE PRINT

DATE: 11/13/08

I would like to see BLM stay in federal hands + management not transferred into private ownership. Lets keep all the wide open spaces that we can. I feel it is being managed well under federal guidelines. As for as off road use lets limit it so it will not be destroyed. your current restrictions work well lets work with WY Game + Fish to make the best habitats as possible. ~~with~~ for instance using beavers as a tool to enhance vegetation growth for all plants + animals. I can not ~~not~~ express how much I enjoy using our federal lands I would hate to see them change.

1072

BB RMP Scoping Comment Form
Comments must be received or postmarked by November 17, 2008

I feel in some areas you have too many wild ~~animals~~ ~~horses~~ that can do as much harm to the ecosystem as off road vehicles so by limiting numbers which you have in the past is a good thing

we as a nation need to look at other ~~of~~ alternative ~~for~~ fuels before we distract the state in energy ~~dev.~~ dev.

I realize we need energy but lets be carefull!

1073

"Information"
 <info@getlost4x4.com>
 11/13/2008 10:59 PM
 Please respond to info@getlost4x4.com

<bbrmp_wymail@blm.gov>
 cc
 Subject
 Bighorn horn basin RMP

Name: Ross Hildebrandt
 Email: info@getlost4x4.com
 Organization: get lost 4x4
 Address: 519 Date Street
 City/State/Zip: Cody, WY 82414
 Date: 11/13/08

Many people have been using the Big Horn Basin as an area for OHV's for as many as 50 years. Some of these routes are roads that OHV'ers have adopted and prescriptively used as destination trails. These routes, in many cases, predate the existence of the BLM, and we contend that the BLM has no right to close the original roads trails that have been used by the public, uninterrupted for 130 years (in some cases).

They lead to vistas, scenic byways, creeks and primitive camping. We contend that all of these routes are valuable, as they are being used to access some type of needed or wanted resource. These trails have not been proven to affect water quality, habitats, or plants. What they are is a road that the BLM cannot afford to manage. Management is not closure. These roads all need to be analyzed individually for their value, and included into the BLM System until this has been accomplished.

The BLM has decided not to designate routes leading to private property, traversing private property, or exiting private property. BLM has also stated that the burden of permitted access to these types of trails will be on the user. We as users will not have the ability to gain permission to cross private property if there are no trails designated to private property. These trails need to be designated until access or easement has been denied by private property owners.

Four wheel drive owners do not want to loose this valuable resource. They use these areas for recreation. Four wheel drive owners build their vehicles to traverse extreme terrain. Most of the time the BLM closes trails because they cannot traverse the terrain in the stock vehicles. OHV's do not feel it is fair to shut down these trails and roads or designate them as only for 4 wheelers just because a car cannot drive over

1073

the trail or road.

OHV's do not approve of adding more area to the already large Wilderness Study Area. This land has been set aside for over 20 years. We feel this land should be opened up again to the Public and off road vehicle travel.

There are 4 wheel drive enthusiasts that spend a great deal of time and money preparing their rigs for the winter. Bead-lock wheels are the most expensive equipment used. The wheels lock the bead of the tire to the wheel, so when the tire is aired down and left with 2-3 lbs of air, the tire will stay on the wheel. The purpose of this is to create a wide footprint which greatly enhances traction in the snow by allowing the vehicle to "float" on top of the snow. It prevents the tires from "digging" into the snow, and also helps prevent tread damage to roads that may have 24-36" of snow pack. The trick to staying on top of the snow is slow steady throttle, which much like the nature of rock crawling reduces the risk of resource damage. Many purchase wider tires as well to aid in deep snow travel.

Thank-you

Comment Document 1074 has been intentionally removed.

1075



Written Comment Sheet

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Bureau of Land Management
 Bighorn Basin RMP
 ATTN: Caleb Hiner
 P.O. Box 119
 101 South 23rd Street
 Worland, WY 82401

Electronic comments are encouraged and can be submitted at: BBRMP_WYMail@blm.gov.
 All comments must be received or postmarked by November 17, 2008. For more information contact BLM RMP Project Manager,
 Caleb Hiner at 307-347-5100 or via e-mail at BBRMP_WYMail@blm.gov.

NAME: <u>JAMES Hillberry</u>	E-MAIL:
ORGANIZATION: <u>Personal</u>	
ADDRESS: <u>Box 653</u>	
CITY/STATE/ZIP: <u>Powell, WY 82435</u>	

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PLEASE PRINT

DATE: 11/13/2008

1. The wilderness study area as now defined should not be expanded in The McCulloch Peaks area. The areas adjacent to the study should remain open to the present uses and access.
2. Energy, oil, gas and other resource development should not be restricted beyond the present level as there has been sufficient and continues to be improvement in the industry that considers the land and environment that now exists. We as individuals desire to have electricity, heat, good roads and fuels to drive our automobiles. Supervised energy development is a must to meet the multiple use requirement of public lands.

1075

BB RMP Scoping Comment Form

Comments must be received or postmarked by November 17, 2008

3. The "Wild Horse" program must be brought into control. This may require The BLM to become an advocate for Congress to re-establish authorization for slaughter of excess and unwanted horses. This would provide food that is a preference, in many countries and could be provided to countries where there is great starvation of all age people.

The excess horse population has a very serious detrimental effect to the range in over grazing and establishing trails to water locations.

4 Livestock grazing must remain an equal status with the wildlife, "wild" horses and other uses on public lands.

1076

"Jim Kirsch"
<jdkirsch@directa
irnet.com>

11/13/2008 09:41
PM

"Caleb Hiner "
<BBRMP_WYMAIL@blm.gov>

"Brett Belden "
<wyowaterwatch@rtconnect.net>,
"Carla Thomas - HSCD"
<Carla.Thomas@wy.nacdnet.net>, "Jim
and Terry Wilson "
<tjkirbycreek@starband.net>
Subject
Bighorn Basin RMP Comments

To
cc

Dear Caleb Hiner,

Attached is a copy of my comments concerning the Bighorn Basin RMP that is currently being revised. If you have any questions, please contact me.

Sincerely,
Jim Kirsch(See attached file: BLM - Big Horn RMP Comments 1108.doc)

1076

James D. Kirsch
PO Box 1104
Thermopolis WY 82443-1104
307 864 3035
307 921 1690 Cell

November 11, 2008

Subject: Proposed ideas for inclusion in Revised Bighorn Basin Resource Management Plan.

Dear Ladies and Gentlemen:

Thank you for providing the opportunity to provide some ideas that will be found helpful in the development of the Revised Bighorn Basin RMP. Below are my suggestions for inclusion in the revised planning document:

- **Energy and Minerals Management** I cannot help but notice in the old Washakie Resource Management Plan that is being revised that substantial portions of the land resource is closed or restricted from energy development.
 - 11,200 acres in the Spanish Point ACEC
 - 86,100 acres will be leased but require “no surface occupancy to protect wildlife habitat, and cultural and recreational sites.”
 - 985,600 acres of federal mineral estate will be leased with seasonal restrictions to protect wildlife habitat
 - 520,000 acres of federal mineral estate will be leased with other subsurface protections.

The sum of these acres is 1,602,900 requiring some special consideration prior to extracting the oil or gas from the ground. In the Record of Decision approving the Washakie Resource Management Plan the total area encompassed is “*approximately 1.23 million surface-acres of public land and approximately 1.6 million acres of federal mineral estate*”. This means that there are special rules and conditions that apply to over 56% of these lands. I believe in the multiple-use of land, however, consideration must be given the economic potential to optimize the utilization of this estate.

- **Management of Riparian Areas and Water Quality Issues** In the Kirby Creek Watershed the landowners and trustees are working together to improve the water quality of the stream and storm the spring runoff in the higher reaches of the watershed. I believe that the BLM should consider this work a priority since the benefits from this activity are beneficial not only to the lessees and the current landowners but have a positive impact on all of the down-stream water users.

1076

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- **Livestock Grazing Issues** An aggressive plan by the BLM to better utilize the available water can result in greater access to water for both wildlife and domestic animals. Increasing the availability of water away from streams can result in better utilization of the range resource. Another advantage would be that wildlife numbers will increase and correspondingly an increase in livestock numbers could be permitted. This increase in utilization could be affected while the range condition would be improved.
- **Weed Management** I believe that the current relationship between the BLM and the Hot Springs County Weed and Pest is an example of a partnership that is working in a positive manner. When I reviewed the last Management Resource Plan, I noticed the following statement:

“Aerial spraying will be discouraged.”

It is my opinion that all of the methods, physical and biological control, including, but not limited to hand pulling, the use of hand tools, mowing, prescribed burning, livestock grazing, the use of insects and chemical spraying should be evaluated and applied based on the most effective available to reduce the number of noxious weeds should be evaluated in light of the cost and the effectiveness of the treatment program. I realize that discouraged does not mean that it will not be allowed but I feel that aerial chemical application should not be discouraged but be part of the evaluation process.

- **Travel Management, Including OFF Highway Vehicle use** I enjoy the ability to use my 4-wheeler in a responsible manner. As an individual that enjoys this activity, I encourage the development and marking of trails that are suitable for this activity.
- **Management of wildlife habitat including protection of sensitive species habitat** Many portions of the Big Horn Basin BLM lands are sensitive species habitat. I should point out that there are large portions of the BLM lands that are able to tolerate the presence of wildlife in the same areas as oil and gas extraction and domestic animal grazing. Some of the wildlife species do not seem to be as sensitive as has been suggested.

1076

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307 864 3035
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- **Land Use Tenure Adjustments, realty leases, and utility corridor right-of-way** The BLM should be aggressive in its efforts to eliminated isolated and uneven boundaries that may exist on federal lands. I am aware that in Township 43 N, Range 92 W a lessee constructed some buildings that were thought to be located on private land. In the review of the survey, an error was noted. I would encourage the BLM to take the required steps to sell the land where the buildings are located. The buildings in question were constructed by the previous owner as located on private land. Resolving this issue would be beneficial to all concerned.

Many land stewards are convinced that utilities should be placed in corridors. One significant drawback to this concept is that confining utility structures and lines into a corridor increases the probability that a single event (such as a tree being blown over) could damage multiple transmission lines thereby reducing the ability of the utility to maintain continuity of service to its customers.

Thank you for the opportunity to comment on this long-range planning document that will provide important direction to the development of this natural resource. If this information is unclear, I would appreciate the opportunity to explain my position in more detail.

Sincerely

James D. Kirsch

James D. Kirsch