

*Casper RMP/EIS Comments***Date of Submittal:** 2006/10/17**Category:** Special Designations

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Special Management Areas

The Sierra Club has very big concerns regarding the special management areas outlined in the plan. First, Federal Land Policy and Management Act clearly gives priority to the designation and protection of areas of critical environmental concern. The Casper RMP, however, decreased the acreage of designated ACECs from the previous Platte River RMP. ACEC acreage went from 217,253 acres in the Platte River Plan to just 19,998 acres in the draft Casper plan. Only two small areas, Jackson Canyon and Alcova Fossil were proposed for designation. We do whole-heartedly support the designation of both of these areas. Although the Sierra Club supports the decision to eliminate the Salt Creek ACEC, there are many deserving areas that should be designated in its stead.

- * Southern Bighorn
- * Red Wall

Probably the most important area is the Southern Bighorns/Red Wall area. The Red Wall was designated an ACEC in the Management Framework Plan which was done for the area, but was undesignated in the Platte River RMP finalized in July of 1985. This former ACEC should be redesignated particularly in light of the Buffalo Field Office's finding that the Hole in the Wall and adjacent Red Wall areas meet the relevance and importance criteria of ACEC designation. Other than the emigrant trails and Teapot Dome, the Hole in the Wall is probably the only other nationally recognized historic site within the area managed by the Field Office. Although the actual Hole in the Wall is located in Johnson County near the Natrona County line, the historic values and outstanding scenery extend into Natrona County and warrant designation. Significant Native American cultural resources are also found in the area, with the Cedar Ridge area overlapping much of the Southern Bighorn-Red Wall area. In fact, we would recommend that the areas be combined into one ACEC, that protects cultural, scenic, and biological values.

The Southern Bighorn-Red Wall also has outstanding visual qualities. The area lies within a view shed that is classified as Scenic Quality A under the latest VRM analysis. The Red Wall is a prominent escarpment of the Chugwater Formation. Its size, color, and lack of man-made intrusions make it a significant scenic value in need of protection. In addition, the Nature Conservancy, in its study Ecoregional Conservation in the Northern Great Plains Steppe, dated March 1, 1999 identified Buffalo Creek, Wyoming, which is the same area as the Southern Bighorn/Red Wall Special Management Area identified in the plan, as an area with outstanding natural features. According to the Nature Conservancy this site is an excellent example of a bluebunch-wheatgrass community, because of shallow soils in the area. The World Wildlife Fund, in conjunction with the Northern Plains Conservation Network, has also identified this area as one of the ten best remaining examples of northern mixed grass prairie left in North America. Its study Ocean of Grass: A Conservation Assessment for the Northern Great Plains, completed in 2003 called the area the Hole the Wall.

The study stated [t]his area rated high due to significant mountain plover habitat, significant prairie dog acreage, relatively intact grasslands, and large contiguous acreage in BLM lands.

Thus, there are multiple reasons that this area should be designated an ACEC. Not only does it possess important historical resources and outstanding scenery, it also has biological importance. We urge the BLM to designate the 372,872 acre Southern Bighorn/Red Wall as an ACEC.

Cedar Ridge - Cedar Ridge is an important historic and spiritual site for the Shoshone Tribe. Cedar Ridge is a site containing hundreds, if not thousands, of ceremonial structures including vision quest sites, and is still used by the Shoshone Tribe for religious observances. The site is eligible for the National Register of Historic Places.

According to the Shoshone, Cedar Ridge is the residence for numerous spirit entities and disturbance of the site would diminish its value and make it unusable for ceremonial purposes.

Obviously, Cedar Ridge perfectly fits the criteria for ACEC designation, and is exactly the type of area that Congress intended for designation when it created the ACEC provision in FLPMA. The Sierra Club urges the BLM to designate Cedar Ridge an ACEC or combined with the Bighorn/Red Wall and made into one larger ACEC. Black-tailed Prairie Dog Habitat Ninety nine percent of the black-tailed prairie dog habitat in the Great Plains has been eliminated. The black-tailed prairie dog is a keystone species. Black-footed ferrets, burrowing owls, and mountain plovers are all dependent on black-tailed prairie dogs. In 1998 a petition was filed by the National Wildlife Federation to list the black-tailed prairie dog as an endangered species. As a way to avert this listing the 11 states, which have black-tailed prairie dogs, agreed to put together state management plans for the black-tailed prairie dogs. In Wyoming this plan was never written.

Because of Wyoming's utter disregard for a management plan, which it agreed to develop, it now puts even a greater responsibility on the Bureau of Land Management and Forest Service to protect and enhance prairie dog management on public lands. The Sierra Club urges the BLM to protect and enhance black-tailed prairie dog habitat as an Area of Critical Environmental Concern.

North Platte River

The North Platte River is truly one the states great recreational resources. The Bureau of Land Management plays an essential role in providing access to the river for recreational purposes. In addition to the outstanding recreational resources at the site, four National Historical Trails follow the river corridor, and the river is known as a Blue Ribbon Fishery.

The North Platte River should definitely be designated an Area of Critical Environmental Concern.

Wilderness

According to BLM, "While the Citizens' Proposal areas may be reasonably natural and contain opportunities for solitude and primitive and (or) unconfined recreation, they are not of sufficient value to warrant management for wilderness character." See DEIS at 2-7. BLM appears to admit that this area meets the naturalness and solitude/primitive recreation criteria for wilderness, and at over 33,000 acres, it obviously meets the size requirement. Thus, BLM should set the area aside and manage it for wilderness qualities until such time as Congress, the only true arbiter of wilderness character, can determine if the wilderness qualities are of "sufficient value" to warrant wilderness protection.

These lands would be closed to mineral leasing under Alternative B, along with many other lands (see Map 9). However, they would be open to future leasing under Alternative E (Map 12).