

MATTHEW H. MEAD
GOVERNOR



STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

January 20, 2011

Donald A. Simpson, State Director
U.S. Department of the Interior
Bureau of Land Management
P.O. Box 1828
Cheyenne, WY 82003-1828

Re: Lander Draft Resource Management Plan and Draft Environmental Impact Statement

Dear State Director Simpson:

Thank you for the opportunity to comment on the Bureau of Land Management (BLM) Draft Resource Management Plan (Draft RMP) and Draft Environmental Impact Statement (DEIS) for the Lander Field Office Planning Area (Planning Area). The Planning Area consists of approximately 6.6 million acres of land in Fremont, Natrona, Sweetwater, Hot Springs, and Teton counties. The BLM alone administers 2.4 million acres of public lands and more than 2.8 million acres of federal mineral estate in the Planning Area. Within the Planning Area, the State of Wyoming controls an additional 271,922 acres of state trust mineral estate and 295,616 acres of state trust surface estate.

The Planning Area supports Wyoming's primary industries – energy, tourism, and agriculture. Wyoming's first oil well was drilled in the Dallas Oil Field in 1884 outside Lander. The Dallas Oil Field continues to produce to this day. Fremont County is gateway to the Wind River and Absaroka Ranges, the greater Yellowstone region, and the Oregon, California, Mormon Pioneer, and Pony Express trails all of which serve a thriving outdoor recreation and cultural and heritage tourism sector. The importance of the agricultural sector to Fremont County and the surrounding region cannot be understated. Livestock grazing on public lands is a critical component of that sector. Collectively, energy, tourism, and agriculture in the Planning Area form a balanced economic triangle that, when supported by federal land management agencies, will grow, expanding into the future. The State of Wyoming needs that growth.

I do not support any of the alternatives as currently drafted, but I want to extend my appreciation to the Lander BLM Field Office for its work to date. I must add here that Alternative B, which is overly restrictive and does not comply with the BLM's requirement that it manage public lands on the basis of multiple-use and sustained yield, should be eliminated from further consideration.

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I am committed to cooperation and coordination regarding the Draft RMP and DEIS for the Planning Area, meaning my staff and I remain ready to assist in the work ahead. I also submit the attached comments on the Draft RMP and DEIS, which are incorporated by reference in this letter. State agencies will also provide detail in their individual comments to the extent they pertain to the mission of their offices.

Thank you again for the opportunity to provide comment. And thank you for the commitment you and your staff have made to work with my office. Please do not hesitate to contact me, as my offer of assistance in this planning effort stands firm.

Best regards,



Matthew H. Mead

Governor

cc: Senator Mike Enzi
Senator John Barrasso
Representative Cynthia Lummis
Fremont County Commission
Chairman Eli Bebout, Senate Minerals, Business and Economic Development
Committee
Chairman Tom Lockhart, House Minerals Business and Economic Development
Committee

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Governor Mead's Comments on Lander Draft RMP and DEIS Attachment A

Air Quality

In Wyoming, the U.S. Environmental Protection Agency (EPA) has delegated authority to regulate air quality and air emissions to the Wyoming Department of Environmental Quality (DEQ). With regard to the BLM planning process, it troubles me that the EPA disregards Wyoming's authority by asserting its own agenda. Specifically, the EPA suggests a lack of air quality modeling to estimate potential impacts of planning decisions on air quality.

Similar to my comments on the Bighorn Basin Draft RMP and DEIS, air quality modeling is speculative during the BLM RMP revision process, does not result in informed planning decisions, lacks technical justification, and has the potential to unnecessarily lead the public to believe that the State of Wyoming is not adequately protecting air quality. Pursuit of air quality modeling only serves to delay future activity when no reason exists to pursue it at this time. A more appropriate action would be for the BLM to work with the DEQ to develop an air resource management plan that defines how and when modeling should be performed and appropriate mitigation.

Specific to the Draft RMP and DEIS, the DEQ has expressed significant concern that the Air Resource Management Plan outlines a strategy that has the potential to adversely impact air resources and lead to misinformed planning decisions within the Planning Area. I request that the BLM work with the DEQ to address DEQ's concerns prior to release of the Final RMP and EIS.

Foreseeable Oil and Gas Development

The Draft RMP and DEIS fails to adequately classify shale development made possible by advances in horizontal drilling and hydraulic fracturing technologies that are unlocking commercial oil from tight sands. In particular, I believe that additional discussion of production potential from the Mowry Shale, the Cody Shale, and the Waltman Shale should be addressed in the Final RMP and EIS. Although there is insufficient information available to project the level of development in these formations, the BLM should allow for additional data and technological breakthroughs. The potential for exploration and development should not be restricted by the BLM in the Final RMP and EIS.

In general, I concur with the Reasonable Foreseeable Development (RFD) assumptions used by the BLM to develop the Draft RMP and DEIS and the level of oil and gas development predicted for the Planning Area. I am aware the BLM does not consider the number of wells that are projected for each alternative in the RFD scenario (or the amount of surface disturbance associated with oil and gas development) as a "limit" or "cap". The purpose of the RFD well count is solely to allow a comparison of the level of potential impacts between alternatives. This is clearly stated in Section 4.2.4.2 Methods and Assumptions of the Draft RMP and DEIS.

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However, because the RFD is often interpreted by the public as an analysis limit or an RMP amendment threshold, I request that the BLM clarify the fifth bullet in Section 4.2.4.2 (Volume 2, p. 637) by adding the language shown below in red:

The number of wells the RFD projected for oil and gas does not limit or cap the number of wells that can be drilled in the planning area, or the amount of surface disturbance associated with oil and gas development. **Exceeding the number of wells in the RFD or the surface disturbance associated with the RFD does not require an RMP amendment.** This clarification reaffirms that the RFD is intended for analysis purposes only, to compare the management prescriptions of each alternative ...

Designated Development Areas

Under Alternative D, the BLM proposes to establish Designated Development Areas (DDA) designed to facilitate intensive mineral exploration, development, and production. DDAs would not be established under Alternatives A, B, or C. I support the establishment of DDAs as identified in Alternative D (Volume 1, pp. 77-78) and ask that the BLM reject all other alternatives that omit them.

The BLM has identified a DDA overlaying existing oil reservoirs between the Beaver Creek and Big Sand Draw fields. My office and the Enhanced Oil Recovery Institute (EORI) of the University of Wyoming have had several discussions regarding enhanced oil recovery (EOR) potential in the main pay and residual oil zones in this area. Recent advances in EOR, particularly using carbon dioxide (CO₂) flooding have proven economically effective in producing large quantities of oil below the oil-water contact in similar reservoirs in the Permian Basin in Texas. The EORI believes that historically produced reservoirs (including Beaver Creek, Big Sand Draw, South Sand Draw, Long Creek and Alkali Butte) and previously uneconomic residual oil zones adjacent to the these fields are suitable targets for EOR during the RMP projection period.

In the Bighorn Basin Draft RMP and DEIS the BLM proposes to establish Oil and Gas Management Areas, which are not dissimilar to DDAs proposed in the Lander Draft RMP and DEIS. It makes sense, particularly considering the fact that both plans are administered within the same district – Wind River/Bighorn Basin – that terminology be consistently applied in both RMPs.

Rights-of-Ways and Corridors

While I applaud BLM's decision to adopt utility corridors in the RMP (the current RMP does not identify corridors), I find that the only viable alternative presented in the Draft RMP and DEIS for rights-of-ways and corridors is a modified Alternative C.

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Major energy transportation networks, installed at great private and public expense, pass through the Planning Area. These networks play a critical role in meeting our nation's energy needs and represent decades of planning decisions made by the federal government and industry. RMP decisions that restrict full use, including expansion, of these existing energy networks are inconsistent with our national goal of energy security and will have adverse effects on our state economy. For example, much of the state's current CO₂ pipeline capacity, crucial for EOR, passes through the Planning Area as well as myriad natural gas and oil pipelines. Some of that capacity flows through Beef Gap which, under all Draft RMP and DEIS alternatives, the BLM proposes to close to additional pipelines. RMP decisions that limit capacity (e.g., corridors) for delivering CO₂ to EOR targets outside the planning area (e.g., the Bighorn or Powder River Basins) or restrict the construction of new pipelines to transport oil from EOR fields will significantly constrain EOR in the state. The BLM needs to take a hard look beyond the boundaries of the Planning Area to determine what future regional activities need to be accommodated by Lander RMP planning decisions – especially decisions relating to corridors. This hard look needs to include conformance with decisions made by BLM in adjacent field office RMPs regarding the continuation of corridors. Industry is currently using those adjacent RMP decisions to plan expansion of existing network infrastructure across the state.

Establishing functional corridors across federally-managed lands in Wyoming is a high priority for the state. Lack of consistency between field office RMPs has created great inefficiencies and uncertainty for energy developers planning major intra- and interstate linear facility projects (including electric transmission) and has become a major stumbling block to private sector efforts to efficiently transport Wyoming resources to meet out-of-state energy demand. The Lander Field Office correctly recognizes these issues as a major management challenge (Volume 1, pp. 422-423) yet still has proposed alternatives that do not allow continuation of corridors designated in adjacent field office RMPs. At a minimum I believe that all of the rights-of-way and corridor alternatives contained in the Final RMP and EIS need to specifically include continuation of corridors established in adjacent field office RMPs. Any alternative (Alternatives A, B and D) that does not accomplish the primary purpose of allowing continuation of designated corridors from adjacent field office RMPs should be rejected. Only Alternative C addresses this fundamental objective.

For example, Figure 1 (Attachment B) shows the locations of corridors designated in the Rawlins RMP and adjoining alternative corridors under consideration for the Lander RMP. Alternative C of the Lander Draft RMP and DEIS designates corridors that allow continuation of the Exxon/Frontier Natural Gas Pipeline, Mustang-Spence Power Line, and Lost Creek Pipeline corridors designated in the Rawlins RMP. However, Alternative D (also shown on Figure 1), the BLM's preferred alternative, only allows for continuation of the Lost Creek Pipeline designated corridor. Similarly, Alternatives A, B and D do not allow continuation of all the corridors designated in the Casper and Bighorn Basin RMPs. Because Alternatives A, B and D do not meet this primary planning objective, they should be rejected by BLM and I question the "reasonableness" of including these alternatives in the NEPA analysis. I request that BLM carefully consider adjacent field office corridors and ensure that proper connections are available before making its final decision.

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Not only do Alternatives A, B and D not meet the objective of providing continuation of corridors designated in adjacent field office RMPs, Alternatives B and D actually preclude or significantly restrict the continuation of these designated corridors in the Lander Field Office. The existing right-of-way for the Exxon/Frontier Natural Gas Pipeline, Mustang-Spence Power Line, and Lost Creek Pipeline, which are designated in the Rawlins RMP as corridors, are mapped as right-of-way exclusion areas under Alternative B in the Lander RMP and as right-of-way avoidance areas under Alternative D. The question that needs to be answered in the Final RMP and EIS is how can a parcel of federal land be mapped as a designated corridor in one field office RMP, but as soon as the existing corridor crosses a field office boundary be mapped as an avoidance or exclusion area? It makes no sense.

Alternative A does not designate corridors (other than the West Wide Energy Corridor) and provides no criteria for determining what locations are preferred for routing. Selection of this alternative would result in significant delays in project approvals as resource specialists unsuccessfully try to balance competing demands. Alternative B essentially provides only a single north-south corridor in the Planning Area. No east-west corridors are identified and the alternative does not continue corridors designated in adjacent field office RMPs. This alternative will not meet future energy transportation demand across the Planning Area.

Similarly, the BLM's preferred alternative (Alternative D) will not meet the future energy transportation demand across the field office. As shown on Figure 1 (Attachment B), this alternative does not allow continuation of corridors designated in adjacent field office RMPs¹. The same disconnect occurs with corridors designated in the Bighorn Basin and Casper RMPs. While a few north-south corridors are provided by Alternative D, no east-west corridor is designated across the southern portion of the field office and the alternative does not provide an economical alternative route for closing Beef Gap to future pipeline construction.

For the Lander RMP, Alternative C, if modified as suggested below, is the only viable alternative and represents a reasonable compromise between reasonably foreseeable development needs and resource protection. I urge that BLM adopt a modified Alternative C for rights-of-way and corridors in the Record of Decision (ROD).

While I urge BLM to adopt Alternative C for rights-of-way and corridors, I believe that several modifications are necessary to protect resources and still allow efficient transportation of Wyoming energy resources. These modifications are described below:

¹ Table 2.28, Record # 6028 of the Draft RMP and DEIS states that Alternative D corridors meet corridors in the Casper Field Office and Rawlins Field Office. As noted, this is not the case. It appears that the statement provided for Alternative D actually applies to Alternative C.

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Above-Ground vs. Buried Utilities in Greater Sage-Grouse Core Area

The Greater Sage-Grouse Core Area protection strategy outlined in Governor's Executive Order (EO) 2011-05, which the BLM has adopted in Wyoming in lieu of the national IM, distinguishes between potential impacts to sage-grouse from above-ground and buried utilities. The differences need to be incorporated into the corridor analysis in the Final RMP and EIS.

EO 2011-05 allows for buried utilities (e.g., pipelines) through sage-grouse core areas so long as timing stipulations to protect strutting and nesting birds are applied to construction activities. Consequently, all corridors proposed under Alternative C would be consistent with the EO for buried utilities. However, the EO 2011-5 establishes a higher consistency criteria for above-ground utilities. In core area, above-ground utility compatibility is based on following existing 115 kV or larger transmission lines. If new, large voltage transmission is proposed within 0.5-mile of existing 115 kV or larger transmission or follow a designated corridor identified in the EO 2011-5², the new project would be consistent with the EO so long as timing stipulations are applied to protect strutting and nesting birds. However, new transmission located further than 0.5-mile of existing 115 kV or larger transmission lines would be inconsistent with EO 2011-5 unless the applicant could demonstrate to state agencies that there would be no adverse affect to sage-grouse populations.

The RMP does not recognize this distinction. For instance, in Alternative C there are several corridors which, while consistent with EO 2011-5 for buried pipelines, would be inconsistent for above-ground transmission. Examples include most of the Lost Creek and Lost Creek Spurs, which are BLM's preferred alternative. In addition, some of the existing transmission lines in the Planning Area are less than 115 kV and should be identified as such for purposes of determining consistency with the EO. I request that in the Final RMP and EIS, the BLM designate appropriate uses for each of the approved corridors based on consistency with the EO and other appropriate criteria.

PacifiCorp Transmission Corridor

Alternative C designates a corridor following the existing PacifiCorp 230 kV transmission line in the western portion of the Planning Area. Discussions with the State Historic Preservation Office (SHPO) suggest that construction of additional utilities in this corridor could result in significant adverse affects to the setting of the South Pass Historic District. Because of the potential impact, I request BLM remove that portion of the PacifiCorp Transmission Corridor located in T. 29 N., R. 100 and 101 W. from Alternative C.

Alternative C Bison Basin Corridor

No explanation is provided in the Draft RMP and DEIS for the Bison Basin Corridor not connecting to the Lost Creek Spur Corridor. I request that the Final RMP and EIS modify

² No transmission line corridors identified EO 2011-5 cross the Lander Field Office.

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Alternative C to extend the Bison Basin corridor to the Lost Creek Spur corridor following Bison Basin Road as shown on Figure 2 (Attachment B). However, because this new corridor is located entirely within sage grouse core area, I request that the BLM restrict the use of this corridor to buried utilities.

I believe the Bison Basin Road Corridor extension is necessary for three primary reasons. First, it provides the most direct route to supply CO₂ from sources in southwestern Wyoming following the Alternative C Frontier/Anadarko Corridor for EOR in the Beaver Creek DDA. Second, it may provide a more direct route to supply CO₂ from the Riley Ridge area of southwest Wyoming to the Bighorn Basin. Third, it avoids the necessity of routing all future south-north pipelines through Crooks Gap. If BLM closes Beef Gap to future pipelines, all south-north corridors from the Rawlins Field Office into the Lander Field Office will need to be routed through Crooks Gap. Because of topographic constraints, Crooks Gap may have limited capacity to accommodate additional pipelines. Consequently, a second corridor between CO₂ supplies located in the Rawlins Field Office (such as the proposed DKRW Project) and the Bighorn Basis is warranted.

Beef Gap Avoidance Corridor

Record # 6019 (Volume 1, p. 129) proposes to close the Beef Gap section of the Sweetwater Rocks complex to any new right-of-way (ROW) even if co-located with existing ROWs. Although I understand BLM's desire to close the existing pipeline corridor through Beef Gap (between Split Rock and Miller Spring Wilderness Study Areas (WSA)) to additional pipeline construction, doing so eliminates a very important east-west corridor through the southern portion of the field office. Under Alternative C, the Frontier/Anadarko Corridor passes through Beef Gap. This corridor contains four 12- to 16-inch pipelines and will be essential in transporting CO₂ from sources in southwestern Wyoming to EOR fields in the central and northeastern portions of the state.

If Beef Gap is closed, BLM needs to provide an additional corridor in Alternative C for that portion of the Frontier/Anadarko corridor that passes through Beef Gap. In the Final RMP and EIS, I request BLM modify Alternative C to include an additional corridor which deviates from the Frontier/Anadarko corridor beginning where the existing Anadarko 16-inch CO₂ line crosses Green Mountain Road (Section 9, T. 28 N., R. 91 W.) and continuing north along Green Mountain Road, across Highway 287 and then north along Agate Road to the existing PacifiCorp transmission line corridor in Section 27, T. 31 N., R. 90 W. (Figure 3, Attachment B). This corridor is delineated on the west side of Agate Flat Road to avoid potential conflicts with the Lankin Dome WSA. Because this corridor is located entirely in sage-grouse core area, I request that the BLM restrict use of this corridor to buried utilities.

Record # 6018

Record # 6018 (Volume 1, p. 129) limits the location of fiber optic and low-voltage powerline corridors to established road systems defined as "interstate or state highways and paved county roads." Specifically, I disagree with limiting the corridors for these linear facilities to "paved"

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county roads. Fremont County-maintained unpaved county roads should also meet the BLMs goal for land resources 3 and objectives 3.1 outlined in Table 2.28. 6000 Lander Resources (LR) – Rights-of-Way and Corridors (Volume 1, p. 129). I request that BLM modify Record # 6018 as follows by striking “paved”:

“Locate linear ROWs such as fiber optic and low-voltage powerline corridors along currently established road systems (e.g., interstate or state highways and ~~paved~~ county roads).”

Record # 6020, Alternative C Corridor Width

BLM describes Alternative C as allowing for major utility corridors up to three miles wide. Assuming that any of the corridors designated in Alternative C would reach three miles in width is unreasonable and inconsistent with more reasonable assumptions contained in adjacent field office RMPs. Table 2.3, ROW/Utility Corridor Areas (Volume 1, p. 35), based on the assumption of a 3-mile wide corridor under Alternative C, the BLM states that 660,908 acres would be dedicated to ROWs and corridors (over 12 times higher than the Alternative D assumption). In real terms, it would take in excess of 54,000 miles of large-diameter pipeline construction to reach the 660,908 acres of ROW reported in Table 2.3. Over 150 pipelines laid side-by-side 100 feet apart would still not fully occupy a 3-mile wide corridor. Similarly, ten 500 kV transmission lines could be constructed side-by-side in a 3-mile wide corridor and still comply with Western Electric Coordinating Council separation criteria. The 3-mile wide corridor associated with Alternative C needs to be modified in the Final RMP and EIS to eliminate the “fear factor” associated with the BLM’s assumption. A more realistic assumption, similar to that used in the recent Rawlins and Bighorn Basin RMP revisions, is appropriate.

I request that BLM modify Record # 6020 for Alternative C as follows³:

*“Allow major utility corridors ~~up to 3 miles wide in the planning area~~ in the following locations (Map 107). **No limit will be placed on the width of these corridors as long as new linear facilities are constructed adjacent to existing linear facilities recognizing the need for adequate separation for operating system integrity, safety (construction and operations), appropriate federal, state and local statutes, regulations and policies, and land use constraints. Where BLM determines that a linear facility should be moved away from an adjacent utility to avoid a resource conflict, the new linear facility will still be considered to be within the RMP corridor.**”*

Right-of-Way Avoidance and Exclusion Areas Based on Greater Sage-Grouse Habitats

The BLM has inappropriately applied avoidance and exclusion areas based on Greater Sage-Grouse habitat under Alternatives B and D. I suspect this was done based on BLM having not

³ Map 107 should be modified to reflect the comments contained herein.

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finalized the National IM for sage-grouse which was completed after release of the Draft RMP and DEIS. As noted earlier, EO 2011-05 sets forth Wyoming's approach to managing sage grouse. Wyoming's strategy has been endorsed by the U.S. Fish and Wildlife Service and Wyoming BLM.

As was stated earlier, Wyoming's core area strategy is based on two types of linear facilities – above-ground and buried utilities. The EO 2011-5 strategy for these two types of utilities is different and using a single strategy for analyzing these utilities, as was done in the Draft RMP and DEIS, results in an overly conservative and inappropriate application of exclusion and avoidance criteria. This undifferentiated approach is inconsistent with EO 2011-5. EO 2011-5 allows for construction and operation of all buried utilities (e.g., pipelines) in core area and adjacent to leks so long as appropriate seasonal construction timing constraints are applied. Pipelines would be allowed to be constructed within core area and within the 0.25 miles of non-core area leks and 0.6 mile of core area leks as long as seasonal construction constraints are applied. Under Alternatives B and D in the Draft RMP and DEIS, the BLM assigns either avoidance or exclusion to both of these habitat types for all ROWs (whether above-ground or buried) which is inconsistent with EO 2011-5.

Transmission lines can be constructed in core area only if they are located within 0.5 miles of existing transmission lines 115 kV or larger or are constructed in corridors designated in the EO (none of these corridors are located in the Lander Field Office). There are several existing transmission line ROWs in the Lander Field Office that meet the EO 0.5 mile criteria and these ROWs should not be considered either avoidance or exclusion under any of the alternatives.

My staff reviewed BLM's shape file named ROW_ALTERNATIVE_D_2010_0730 and revised the file to correctly reflect the EO. Table 1 (Attachment B) lists the polygons which should be removed from the shape file to make the avoidance and exclusion categorization based on sage-grouse habitat types consistent with the EO requirements for pipelines and other buried utilities. A comparison of the ROW avoidance and exclusion areas mapped by BLM for Alternative D in the Draft RMP and EIS (Map 104) and those which are consistent for the EO for pipelines and other buried utilities is provided on Figure 4 (Attachment B).

Obviously, the BLM also needs to carefully review how sage-grouse habitats are used to define ROW avoidance and exclusion areas for all other alternatives as well as for above-ground utilities. I strongly encourage BLM to meet with my staff to address the differences in our core area strategy for above and below-ground utilities and not lump these very different types of utilities into a single avoidance or exclusion category in the Final RMP and EIS.

Right-of-Way Avoidance and Exclusion Areas Based on Continental Divide National Scenic Trail

When the sage-grouse polygons on Table 1 (Attachment B) are removed from BLM's shape file ROW_ALTERNATIVE_D_2010_0730, a large polygon of ROW exclusion remains in the southwestern portion of the planning area (see Figure 5, Attachment B). The attributes of this

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polygons identify the exclusion area as a ten mile wide buffer of the Continental Divide National Scenic Trail (CDNST) which corresponds with Map 121 of the Draft RMP and DEIS.

I disagree with the management prescriptions proposed for the CDNST under Alternatives B and D. Alternative C provides a much more balanced approach for managing the CDNST. Under Alternative C the BLM proposes to manage a 0.5 mile wide corridor centered on the CDNST as an Extensive Recreation Management Area (ERMA) which I believe is appropriate. However, as is shown on Figure 5 (Attachment B), within the Alternative C ERMA there are numerous existing and proposed disturbances/management directions related to:

- State-owned lands
- Private-owned lands
- State highways (which should be buffered by 0.25 miles)
- County roads (which should be buffered by 0.25 miles)
- Producing and shut-in oil and gas wells (which should be buffered by 0.25 miles)
- Areas with a state spacing/drilling order
- Federal oil and gas units
- Existing pipelines (which should be buffered by 0.25 miles)
- Existing transmission lines (which should be buffered by 0.25 miles)
- Alternative C corridors

It would be inappropriate to designate any of these areas as ERMA and each should be removed from the 0.5 mile ERMA for Alternative C as shown on Figure 5 (Attachment B).

Alternative D proposes to manage lands within a ten mile wide corridor centered on the trail (except for areas east of the Happy Springs Oil Field) as the CDNST ERMA. This ERMA would classify over 547,000 acres as ROW exclusion under both Alternatives B and D. I see no justification for such a restrictive designation of such a large area. It seems reasonable to conclude that much of the area within the ten mile wide corridor would not be visible by hikers using the trail. SHPO recently completed a viewshed analysis of the historic trails in the Lander Field Office. A portion of the national historic trails overlap the CDNST in the western portion of the planning area. SHPO's viewshed analysis indicates that only a very small portion of the area within the ten mile wide Alternative D CDNST ERMA is visible from contributing segments of the national historic trail where it overlaps the CDNST.

BLM may desire to consider conditional surface use for a limited distance (but not ten miles) beyond the 0.5 mile wide Alternative C ERMA. However, to investigate the feasibility of such a designation I urge BLM to do a thorough viewshed analysis of the area and to share the results of that analysis with cooperating agencies and my office.

Right-of-Way Avoidance and Exclusion Areas Based on National Historic Trails

I request that the BLM reject any alternative that would expand (by ACEC designation, creation of a Heritage Tourism and Recreation Management Corridor, or other means) the current 0.25

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mile wide no surface occupancy (NSO) buffer along the national historic trails. I recommend that the BLM continue this management strategy by adopting Alternative A for Record #s 7003 through 7006. The BLM's proposal under Alternative D to manage the ten mile wide Heritage Tourism and Recreation Management Corridor as VRM II would significantly restrict development and current land use activities far beyond the area (based on the current 0.5 mile wide buffer) currently managed by the BLM as NSO. In addition, the current NSO designation should be for designated corridors or where existing disturbances cross the trails or exist in the adjacent viewshed. I urge BLM to do a thorough viewshed analysis of the area and to share the results of that analysis with cooperating agencies and my office.

Master Leasing Plans

In the Planning Area, the BLM received and reviewed proposals for five areas nominated for Master Leasing Plan (MLP) review, a concept introduced to address oil and gas leasing in areas with resource values of concern. The MLP concept is outlined in Oil and Gas Leasing Reform Instructional Memorandum (IM) 2010-117. In the Planning Area these included the Dubois, Beaver Rim, Bighorn Basin, Sweetwater/South Pass, and Green Mountain/Ferris Mountain. Following the BLM's review of these proposals it was established that none of the nominated areas were determined to meet the criteria for requiring MLP analysis. However, exercising BLM Wyoming State Director discretion allowed under IM 2010-117, two areas – Dubois and Beaver Rim – were evaluated as a part of the land use planning process. In the Draft RMP and DEIS the BLM proposes to establish the Beaver Rim MLP yet provides no justification as to why the resource values require additional site-specific resource protections other than those proposed in other areas within the Planning Area. I request that the BLM provide this rationale and support it with data prior to applying a generalized MLP approach.

Carbon Dioxide Sequestration

The recent Draft RMP and DEIS for the Bighorn Basin addresses CO₂ sequestration. CO₂ sequestration is not specifically addressed in the Draft RMP and DEIS for the Lander Field Office. I request that the BLM adopt a specific management action in the Final RMP and EIS for CO₂ sequestration that states:

“Allow carbon dioxide sequestration and research.”

Greater Sage-Grouse

The Greater Sage-Grouse Core Area Protection strategy, embodied in EO 2011-5, is Wyoming's long-term strategy for the conservation of the Greater Sage-Grouse and its habitat. The BLM has served as a member of the Sage-Grouse Implementation Team with equal opportunity for input into the development of that strategy. This is not the time for deviation from that plan. Deviation is the one thing that will undermine support for the conservation strategy embodied in the EO.

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The BLM proposes to establish the Government Draw/Upper Sweetwater Sage-Grouse Reference and Education Area (Reference and Education Area) for the long-term protection of Greater Sage-Grouse habitat under Alternatives B and D. The BLM has not adequately explained the need for this special designation and the additional protections proposed (e.g., NSO). As such, I do not support the establishment of the Reference and Education Area and specifically request that the BLM select Alternative A or C. To the extent the BLM desires, I and my staff are willing to discuss the intent that underlies the proposal to establish a Reference and Education Area to determine alternative means to obtain the data and information desired.

The Draft RMP and DEIS reference EO 2008-2 (Volume 1, p. 370; Volume 3, p. 1352) and EO 2010-4 (Volume 2, p. 1208). This is inaccurate. Governor's EO 2008-2 was replaced by EO 2010-4 and subsequently replaced by EO 2011-5, Greater Sage-Grouse Core Area Protection, which I signed on June 2, 2011. To the extent necessary these references and associated language should be corrected to reflect the most up-to-date information. Further, the definition of Core Area (Volume 3, p. 1320) should be updated and include reference to EO 2011-5.

It is also my understanding that the BLM is on the verge of issuing a revised state IM to replace IM WY-2010-012, which is intended to endorse Wyoming's Greater Sage-Grouse Core Areas strategy as embodied in EO 2011-5. Once issued the Draft RMP and DEIS should be corrected to reflect the most up-to-date information and management strategy.

The Final RMP and EIS should maintain consistency with the Greater Sage-Grouse Core Area Protection strategy provided in EO 2011-5. Specifically, I request that the BLM address the inconsistencies outlined in the Wyoming Game and Fish Department comments on the Draft RMP and DEIS.

Lands with Wilderness Characteristics

Within the Planning Area, the BLM currently manages a significant number of acres (55,338) as wilderness study areas and the BLM has not justified the need to manage additional areas for such restrictive use. I do not support the BLM proposal to manage additional lands to protect wilderness characteristics, specifically the Little Red Creek Complex, including Red Creek and portions of Torrey Rim. I request that the BLM reject Alternative D and select Alternative A in this regard.

Livestock Grazing

The BLM administers more than 300 grazing allotments covering 2,352,458 acres of surface with approximately 279,000 animal unit months (AUMs). Agricultural production, including livestock grazing, played an important role in the settlement of Wyoming and remains an integral part of Wyoming's history and traditions. Livestock grazing has occurred on public lands throughout the west for more than 100 years and has successfully co-existed with other land uses while contributing to the long-term health and productivity of these lands. Grazing has

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demonstrated its value in maintaining open space, maintaining recreational opportunities, and as an important economic engine for the local, regional, and state economy.

I find Alternative D unacceptable and cannot support the proposed loss of over 50,000 permitted AUMs, roughly an 18 percent reduction over the life of the plan. No data is cited to support reduction of permitted AUMs. Further, any reduction in AUMs should be determined at the permit level and not through land use planning. Alternative D, as proposed, will have significant and lasting negative impacts on the economics of ranching in the Planning Area. The BLM should not limit or stop livestock grazing and when appropriate should provide for the flexibility to allow for increased grazing. Further, livestock grazing should remain an allowable use in all management areas and range improvement projects should be allowed in trail corridors.

Livestock grazing management, similar to other public land uses, is subject to a diverse set of variables within and out of the control of the immediate landowner. The state, entrusted with the management of state trust lands, is intimately aware of the incredible management challenge associated with connected state, fee and federal grazing lands. Specific to the Planning Area, I look forward to swift resolution to the management challenges associated with management of the Green Mountain Common Allotment within the Planning Area. The state, through its agencies, is committed to a thoughtful resolution that incorporates a shared decision making paradigm that acknowledges the state's interests.

Surface-Disturbing Activities

To the extent that the BLM proposes to prohibit routine production operations in crucial winter range areas, I am opposed. This not only poses a potential safety risk, it could cause year-round operations to cease which will have a significant impact on revenue streams and job creation.

Phosphate Mining

Only recently a number of individuals and groups have expressed concern with relation to phosphate mining in the Planning Area, specifically on state lands adjacent to the Lander Slope ACEC and the Red Canyon ACEC. Under Alternative D a large portion of the Planning Area would be closed to phosphate leasing. The Office of State Lands and Investments has advised the BLM concerning the interest in phosphate leasing on state trust lands. I am advised that no movement has been made towards a resolution. Absent a favorable solution by July 2012, the state will have no choice but to make the parcels in question available for phosphate leasing.

Geothermal

Recent magnetotelluric data from EarthScope shows a potential new site in northwest Wyoming, outside of Yellowstone National Park, for geothermal energy production. This potential new site is in the Dubois area – from and including 108 degrees west to the end of BLM subsurface jurisdiction (west), and from T43N through T41N. Although additional site-specific magnetotelluric data, gravity, seismic, and economic studies are needed to provide a more

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detailed analysis of this geothermal region, this data counters the BLM assertion that the potential for geothermal production is low, very low, or negligible. In addition to my interest in geothermal development, the Wyoming legislature is considering opportunities to further study of geothermal potential in Wyoming. I request that the BLM analyze this new magnetotelluric data, reconsider its assumptions, and where appropriate provide opportunities for geothermal development.

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**Governor Mead's Comments on Lander Draft RMP and DEIS
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**Table 1.
 Polygons Which Should be Removed from ROW_ALTERNATIVE_D_2010_0730
 to Make Alternative D Consistent with Executive Order 2011-05 for Buried Utilities**

FID	NAME	FILE	TYPE
10	0.6 Mile Occupied Leks	LFO_occupied_leks_6tenthsmlbufdislv.shp	EXCLUSION
11	Soap Holes	Core_lekperim_sixteenth.shp	EXCLUSION
12	Nancy Creek Reservoir	Core_lekperim_sixteenth.shp	EXCLUSION
13	Nancy Creek	Core_lekperim_sixteenth.shp	EXCLUSION
14	Pit	Core_lekperim_sixteenth.shp	EXCLUSION
15	Bridger Trail	Core_lekperim_sixteenth.shp	EXCLUSION
16	Fuller Airstrip	Core_lekperim_sixteenth.shp	EXCLUSION
17	Maverick Butte	Core_lekperim_sixteenth.shp	EXCLUSION
18	9 Mile North	Core_lekperim_sixteenth.shp	EXCLUSION
19	Davison Road - 8 Mile	Core_lekperim_sixteenth.shp	EXCLUSION
20	South Bridger Creek	Core_lekperim_sixteenth.shp	EXCLUSION
21	McTurk Ridge	Core_lekperim_sixteenth.shp	EXCLUSION
22	McTurk Draw	Core_lekperim_sixteenth.shp	EXCLUSION
23	West Long Creek No. 2	Core_lekperim_sixteenth.shp	EXCLUSION
24	West Long Creek No. 1	Core_lekperim_sixteenth.shp	EXCLUSION
25	Long Creek No. 1	Core_lekperim_sixteenth.shp	EXCLUSION
26	Carmody Lake	Core_lekperim_sixteenth.shp	EXCLUSION
27	Dishpan Butte	Core_lekperim_sixteenth.shp	EXCLUSION
28	Antelope Springs	Core_lekperim_sixteenth.shp	EXCLUSION
29	Warm Springs No. 1	Core_lekperim_sixteenth.shp	EXCLUSION
30	Graham Road	Core_lekperim_sixteenth.shp	EXCLUSION
31	Cedar Rim Pipeline No. 2	Core_lekperim_sixteenth.shp	EXCLUSION
32	Long Creek No. 3	Core_lekperim_sixteenth.shp	EXCLUSION
33	Twin Creek	Core_lekperim_sixteenth.shp	EXCLUSION
34	East Twin Creek	Core_lekperim_sixteenth.shp	EXCLUSION
35	Long Creek No. 3	Core_lekperim_sixteenth.shp	EXCLUSION
36	East Long Creek No. 2	Core_lekperim_sixteenth.shp	EXCLUSION
37	East Long Creek No. 3	Core_lekperim_sixteenth.shp	EXCLUSION
38	East Long Creek No. 1	Core_lekperim_sixteenth.shp	EXCLUSION
39	Bill's	Core_lekperim_sixteenth.shp	EXCLUSION
40	Dry Draw	Core_lekperim_sixteenth.shp	EXCLUSION
41	Spring Creek	Core_lekperim_sixteenth.shp	EXCLUSION
42	Rawlins Draw	Core_lekperim_sixteenth.shp	EXCLUSION
43	Blackjack	Core_lekperim_sixteenth.shp	EXCLUSION
44	North Dobie No. 1	Core_lekperim_sixteenth.shp	EXCLUSION
45	Arrowhead - West	Core_lekperim_sixteenth.shp	EXCLUSION
46	Powerline	Core_lekperim_sixteenth.shp	EXCLUSION
47	Powerline	Core_lekperim_sixteenth.shp	EXCLUSION

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48	Landing Strip	Core_lekperim_sixteenth.shp	EXCLUSION
49	Boulder Flat (#8)	Core_lekperim_sixteenth.shp	EXCLUSION
50	Ballenger Draw	Core_lekperim_sixteenth.shp	EXCLUSION
51	Lander Valley Reservoir	Core_lekperim_sixteenth.shp	EXCLUSION
52	North Sand Gulch	Core_lekperim_sixteenth.shp	EXCLUSION
53	Conant Fence	Core_lekperim_sixteenth.shp	EXCLUSION
54	West Carr Springs Draw	Core_lekperim_sixteenth.shp	EXCLUSION
55	Carr Springs Draw	Core_lekperim_sixteenth.shp	EXCLUSION
56	Monument Draw	Core_lekperim_sixteenth.shp	EXCLUSION
57	Gustin Reservoir	Core_lekperim_sixteenth.shp	EXCLUSION
58	Preacher Reservoir	Core_lekperim_sixteenth.shp	EXCLUSION
59	Radio Tower Draw No. 2	Core_lekperim_sixteenth.shp	EXCLUSION
60	Buffalo Creek	Core_lekperim_sixteenth.shp	EXCLUSION
61	Mitten Springs North	Core_lekperim_sixteenth.shp	EXCLUSION
62	Cottontail Reservoir	Core_lekperim_sixteenth.shp	EXCLUSION
63	Long Gulch	Core_lekperim_sixteenth.shp	EXCLUSION
64	McGraw Flats No. 2	Core_lekperim_sixteenth.shp	EXCLUSION
65	Grassy Lake	Core_lekperim_sixteenth.shp	EXCLUSION
66	Coyote Lake	Core_lekperim_sixteenth.shp	EXCLUSION
67	Coyote Lake	Core_lekperim_sixteenth.shp	EXCLUSION
68	Picket Lake	Core_lekperim_sixteenth.shp	EXCLUSION
69	9 Mile South	Core_lekperim_sixteenth.shp	EXCLUSION
70	Pipeline	Core_lekperim_sixteenth.shp	EXCLUSION
71	Falcon Nest	Core_lekperim_sixteenth.shp	EXCLUSION
72	Squaw Butte East	Core_lekperim_sixteenth.shp	EXCLUSION
73	Conant Creek - North Twin	Core_lekperim_sixteenth.shp	EXCLUSION
74	18-Arrowhead - East	Core_occlek_sixteenth.shp	EXCLUSION
75	18-Little Sand Draw	Core_occlek_sixteenth.shp	EXCLUSION
76	18-South Fuller Reservoir	Core_occlek_sixteenth.shp	EXCLUSION
77	8-Antelope Flats	Core_occlek_sixteenth.shp	EXCLUSION
78	8-Ballenger Reservoir	Core_occlek_sixteenth.shp	EXCLUSION
79	8-Chubby Springs	Core_occlek_sixteenth.shp	EXCLUSION
80	8-Chugwater Reservoir	Core_occlek_sixteenth.shp	EXCLUSION
81	8-Coal Mine Gulch	Core_occlek_sixteenth.shp	EXCLUSION
82	8-Cottonwood Divide No. 2	Core_occlek_sixteenth.shp	EXCLUSION
83	8-Crofts	Core_occlek_sixteenth.shp	EXCLUSION
84	8-Daley Lake	Core_occlek_sixteenth.shp	EXCLUSION
85	8-Dry Cheyenne	Core_occlek_sixteenth.shp	EXCLUSION
86	8-Government Slide Draw	Core_occlek_sixteenth.shp	EXCLUSION
87	8-Hall Creek No. 1	Core_occlek_sixteenth.shp	EXCLUSION
88	8-Hall Creek No. 2	Core_occlek_sixteenth.shp	EXCLUSION
89	8-Ice Slough	Core_occlek_sixteenth.shp	EXCLUSION
90	8-Long Creek No. 2	Core_occlek_sixteenth.shp	EXCLUSION
91	8-Long Creek No. 4	Core_occlek_sixteenth.shp	EXCLUSION
92	8-McGraw Flats No. 1	Core_occlek_sixteenth.shp	EXCLUSION
93	8-Mitten Springs South	Core_occlek_sixteenth.shp	EXCLUSION
94	8-Ninemile Draw	Core_occlek_sixteenth.shp	EXCLUSION

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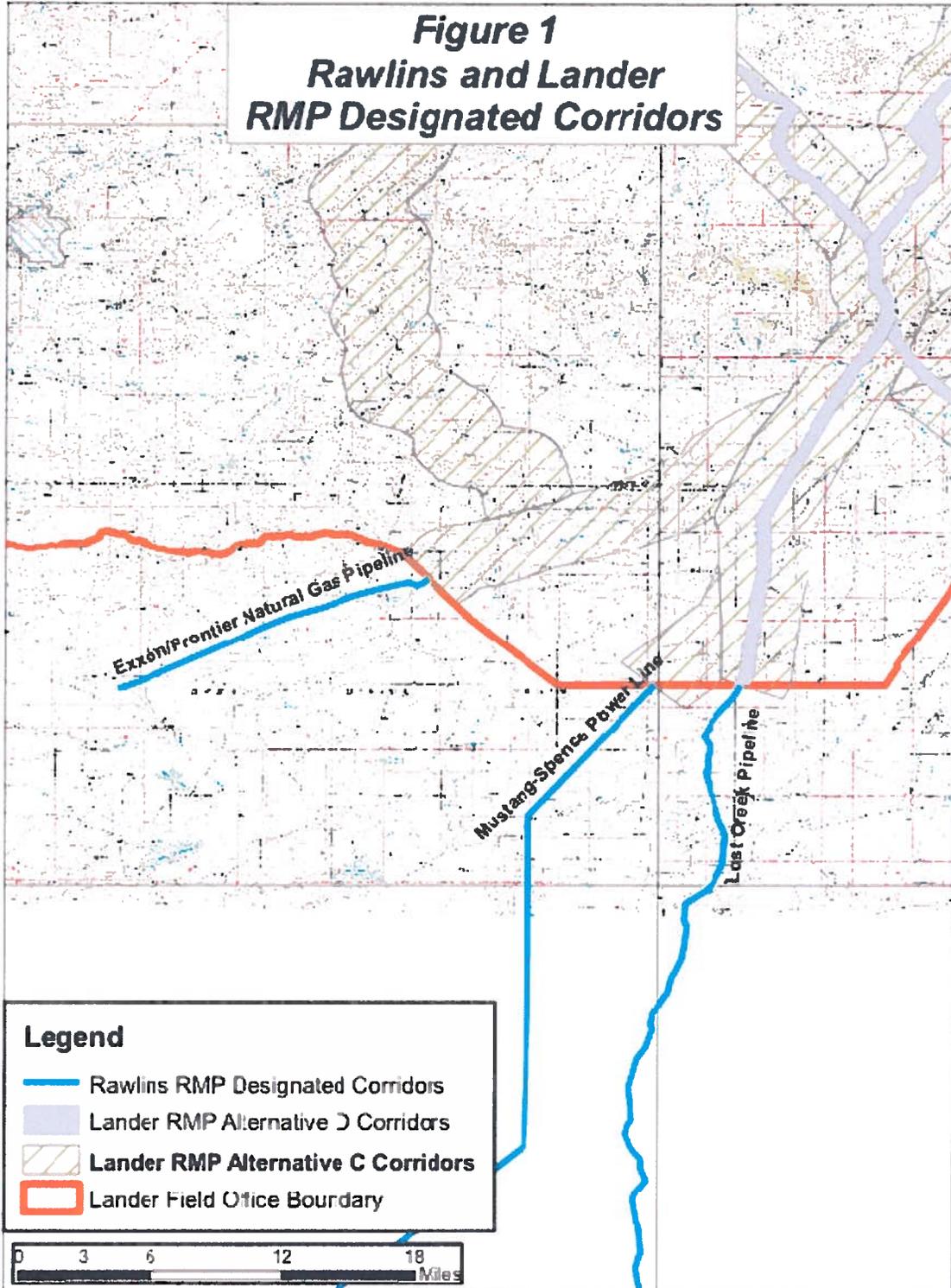
95	8-Ninemile Reservoir	Core_occlek_sixteenth.shp	EXCLUSION
96	8-Onion Flats No. 1	Core_occlek_sixteenth.shp	EXCLUSION
97	8-Onion Flats No. 2	Core_occlek_sixteenth.shp	EXCLUSION
98	8-Praecher Playa	Core_occlek_sixteenth.shp	EXCLUSION
99	8-Radium Springs	Core_occlek_sixteenth.shp	EXCLUSION
100	8-Scarlett Ranch	Core_occlek_sixteenth.shp	EXCLUSION
101	8-Silver Creek	Core_occlek_sixteenth.shp	EXCLUSION
102	8-South Sulphur	Core_occlek_sixteenth.shp	EXCLUSION
103	8-Thomsen Well	Core_occlek_sixteenth.shp	EXCLUSION
104	8-Willow Creek State Section	Core_occlek_sixteenth.shp	EXCLUSION
105	8-Wilson Gulch	Core_occlek_sixteenth.shp	EXCLUSION
106	9-Arapahoe	Core_occlek_sixteenth.shp	EXCLUSION
107	9-Eagles Nest Fence	Core_occlek_sixteenth.shp	EXCLUSION
108	9-East Alkali	Core_occlek_sixteenth.shp	EXCLUSION
109	9-Girard	Core_occlek_sixteenth.shp	EXCLUSION
110	9-Hadsell Crossing	Core_occlek_sixteenth.shp	EXCLUSION
111	9-Hadsell Road	Core_occlek_sixteenth.shp	EXCLUSION
112	9-Lost Creek	Core_occlek_sixteenth.shp	EXCLUSION
113	9-Lost Creek Basin	Core_occlek_sixteenth.shp	EXCLUSION
114	9-North Girard	Core_occlek_sixteenth.shp	EXCLUSION
115	9-Red Creek	Core_occlek_sixteenth.shp	EXCLUSION
116	9-Scotty Lake	Core_occlek_sixteenth.shp	EXCLUSION
117	9-Smiley Springs	Core_occlek_sixteenth.shp	EXCLUSION
118	9-Stinking Springs	Core_occlek_sixteenth.shp	EXCLUSION
119	18-Black Rocks	Core_occlek_sixteenth.shp	EXCLUSION
120	18-Canyon Creek - Ranch	Core_occlek_sixteenth.shp	EXCLUSION
121	18-Canyon Creek - Ranch South	Core_occlek_sixteenth.shp	EXCLUSION
122	18-Canyon Creek - Red Hill	Core_occlek_sixteenth.shp	EXCLUSION
123	18-Canyon Creek - South	Core_occlek_sixteenth.shp	EXCLUSION
124	18-Canyon Creek - Stock Pond	Core_occlek_sixteenth.shp	EXCLUSION
125	18-Canyon Creek - Well	Core_occlek_sixteenth.shp	EXCLUSION
126	18-Chalk Hills	Core_occlek_sixteenth.shp	EXCLUSION
127	18-Conant Creek - South Twin	Core_occlek_sixteenth.shp	EXCLUSION
128	18-Davison Road - East 12 Mile	Core_occlek_sixteenth.shp	EXCLUSION
129	18-Davison Road - North 12 Mile	Core_occlek_sixteenth.shp	EXCLUSION
130	18-Davison Road - South 12 Mile	Core_occlek_sixteenth.shp	EXCLUSION
131	18-East Canyon Creek	Core_occlek_sixteenth.shp	EXCLUSION
132	18-Oil Playa	Core_occlek_sixteenth.shp	EXCLUSION
133	18-Willow Springs Draw	Core_occlek_sixteenth.shp	EXCLUSION
134	18-Windmill	Core_occlek_sixteenth.shp	EXCLUSION
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139	8-Cottonwood Creek	Core_occlek_sixteenth.shp	EXCLUSION
140	8-Dry Creek	Core_occlek_sixteenth.shp	EXCLUSION
141	8-Dry Lakes	Core_occlek_sixteenth.shp	EXCLUSION

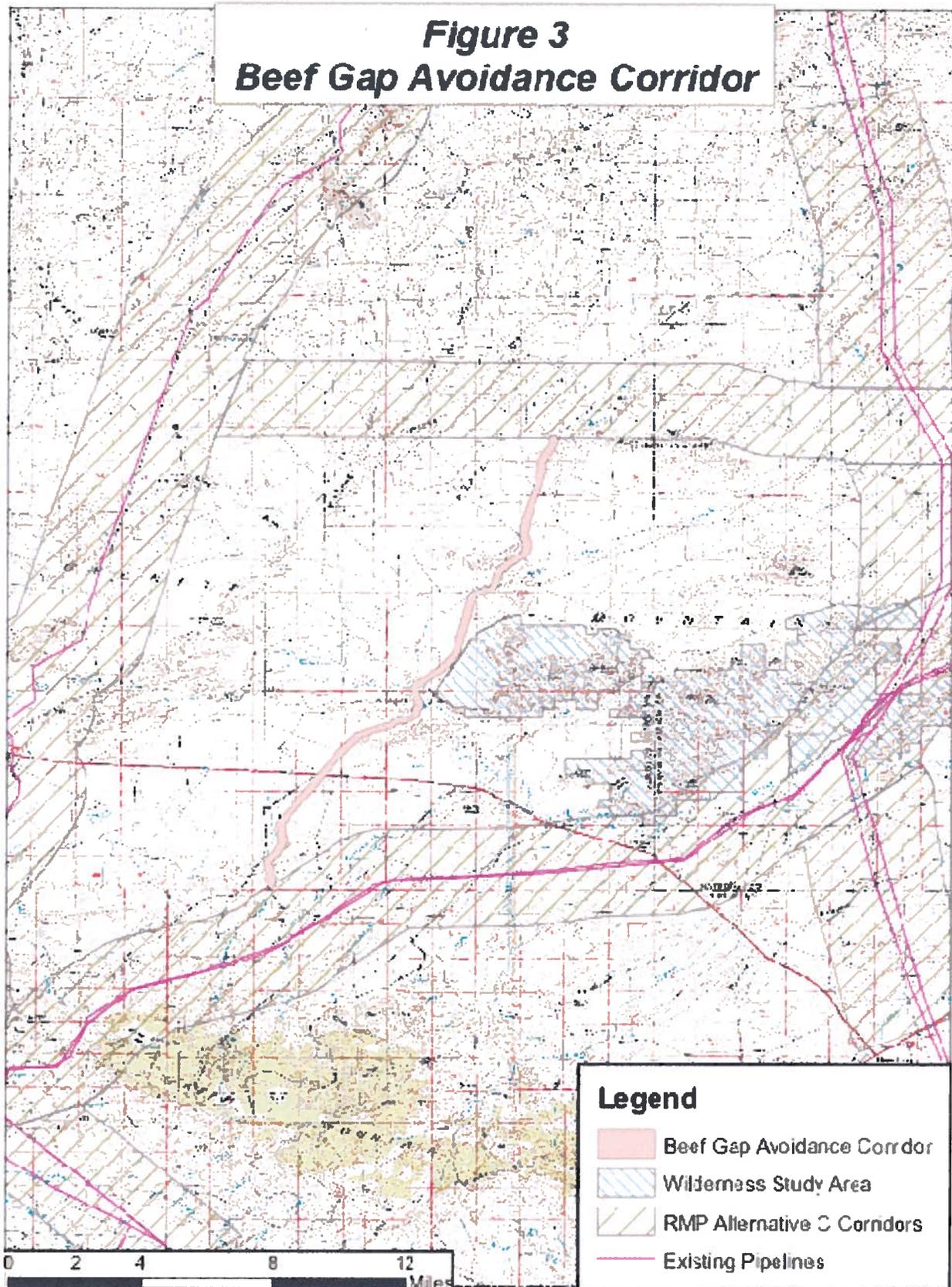
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142	8-Homestead Flats	Core_occlek_sixteenth.shp	EXCLUSION
143	8-Horseshoe Playa	Core_occlek_sixteenth.shp	EXCLUSION
144	8-McIntosh Meadows	Core_occlek_sixteenth.shp	EXCLUSION
145	8-North Dobie	Core_occlek_sixteenth.shp	EXCLUSION
146	8-Radio Tower Draw No. 1	Core_occlek_sixteenth.shp	EXCLUSION
147	8-Sage Hen No. 1	Core_occlek_sixteenth.shp	EXCLUSION
148	8-Sage Hen No. 2	Core_occlek_sixteenth.shp	EXCLUSION
149	8-Sage Hen No. 3	Core_occlek_sixteenth.shp	EXCLUSION
150	8-Sage Hen No. 4	Core_occlek_sixteenth.shp	EXCLUSION
151	8-Signor Pipeline	Core_occlek_sixteenth.shp	EXCLUSION
152	8-Signor Ridge	Core_occlek_sixteenth.shp	EXCLUSION
153	9-Bare Ring Butte	Core_occlek_sixteenth.shp	EXCLUSION
154	9-Discover	Core_occlek_sixteenth.shp	EXCLUSION
155	9-Discover East	Core_occlek_sixteenth.shp	EXCLUSION
156	9-Eagles Nest Draw	Core_occlek_sixteenth.shp	EXCLUSION
157	9-Eagles Nest Reservoir	Core_occlek_sixteenth.shp	EXCLUSION
158	9-East Antelope	Core_occlek_sixteenth.shp	EXCLUSION
159	9-Harrier	Core_occlek_sixteenth.shp	EXCLUSION
160	9-Little Osborne	Core_occlek_sixteenth.shp	EXCLUSION
161	9-Lost Alkali	Core_occlek_sixteenth.shp	EXCLUSION
162	9-Lost Arapahoe	Core_occlek_sixteenth.shp	EXCLUSION
163	9-Osborne Draw	Core_occlek_sixteenth.shp	EXCLUSION
164	9-Prospects	Core_occlek_sixteenth.shp	EXCLUSION
165	9-Sand Gully	Core_occlek_sixteenth.shp	EXCLUSION
166	Lysite Creek – Bottom	NonCore_Lekperim_quart.shp	EXCLUSION
167	Beulah Belle Lake	NonCore_Lekperim_quart.shp	EXCLUSION
168	Nebo	NonCore_Lekperim_quart.shp	EXCLUSION
169	Nebo	NonCore_Lekperim_quart.shp	EXCLUSION
170	Ocla Draw	NonCore_Lekperim_quart.shp	EXCLUSION
171	Sand Creek Bench	NonCore_Lekperim_quart.shp	EXCLUSION
172	Dry Pond	NonCore_Lekperim_quart.shp	EXCLUSION
173	18-Birdsfoot	NonCore_occlek_quart.shp	EXCLUSION
174	18-Davis Pass – North	NonCore_occlek_quart.shp	EXCLUSION
175	18-Davis Pass – West	NonCore_occlek_quart.shp	EXCLUSION
176	18-Davison Road - 7 Mile	NonCore_occlek_quart.shp	EXCLUSION
177	18-Devil's Slide	NonCore_occlek_quart.shp	EXCLUSION
178	18-Iron Horse	NonCore_occlek_quart.shp	EXCLUSION
179	18-Lysite Creek – Hill	NonCore_occlek_quart.shp	EXCLUSION
180	18-Noble Ridge	NonCore_occlek_quart.shp	EXCLUSION
181	8-Puddle Springs	NonCore_occlek_quart.shp	EXCLUSION
182	8-Riddle	NonCore_occlek_quart.shp	EXCLUSION
183	8-West Canyon Creek	NonCore_occlek_quart.shp	EXCLUSION
184	9-North Lamont	NonCore_occlek_quart.shp	EXCLUSION
186	Dubois Area	LFO Core.shp	EXCLUSION
202	Sage Grouse	AltD ACEC.shp	EXCLUSION
212	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
213	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION

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214	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
215	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
216	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
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233	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
234	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
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236	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
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239	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
240	NonCore 2 mile merge	NonCore_2mi_Merge.shp	EXCLUSION
241	Alt D Sagegrouse Core Areas	AltD_SG_CoreArea.shp	EXCLUSION





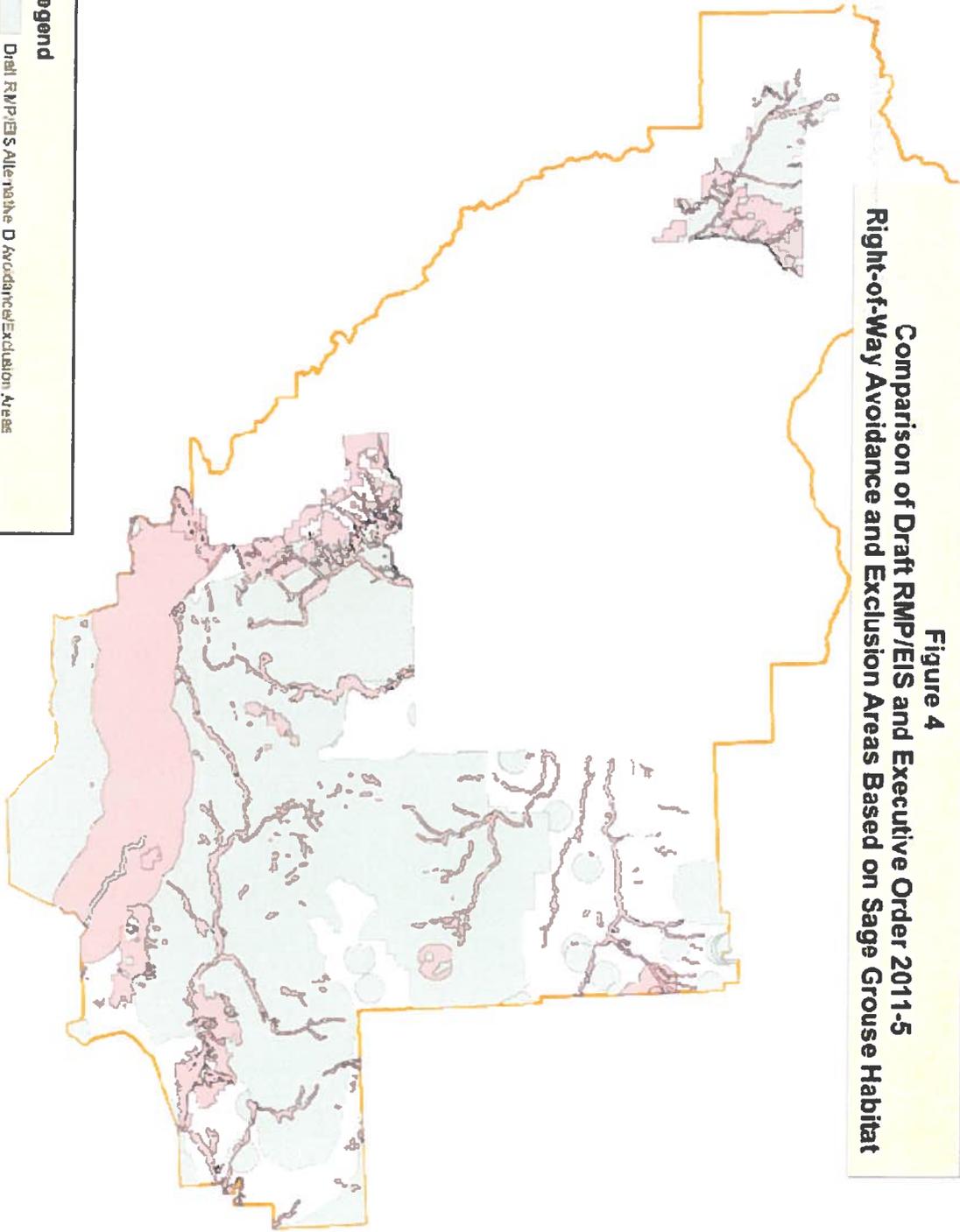
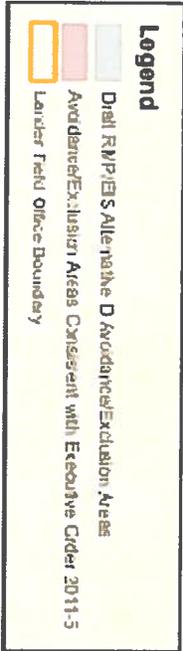


Figure 4
Comparison of Draft RMP/EIS and Executive Order 2011-5
Right-of-Way Avoidance and Exclusion Areas Based on Sage Grouse Habitat



Figure 5
Alternative D CDNST ERMA
Right-of-Way Avoidance and Exclusion Areas and
Existing Disturbance/Management Direction

