

Wyoming Native Plant Society
P.O. Box 2449
Laramie, WY 72073

Kimberlee Foster, Field Manager
Bureau of Land Management
Rock Springs Field Office 280 Highway 191 N
Rock Springs, WY 82901

Re. RMP for the Rock Springs Field Office
November 25, 2025

Dear Ms. Foster:

Wyoming Native Plant Society appreciates this opportunity to comment on the Rock Springs Field Office Record of Decision and Approved Resource Management Plan, as released in December 2024, and proposed for amendments on October 2, 2025 (DOI-BLM-WY-D040-2026-0001-RMP-EA). We strongly support the integration of natural resource conservation as presented in Alternative D of the 2024 Plan, retaining special management designations. We recognize that the prevailing land use in the Rock Springs Field Office has been and will continue to be livestock grazing, and that over 75% of the Field Office is already leased or available for energy development. This is a management framework and critical context that belonged in the resource management plan of 2024 and in proposed amendments to it.

We've been following management plans coming out of Rock Springs for a long time. In December 1997, BLM designated Areas of Critical Environmental Concern (ACEC) for state endemic plants in the Green River Resource Area Management Plan and it was heralded the same year in *Castilleja*, the Wyoming Native Plant Society newsletter (Vol. 16, No. 4). We commend BLM for carrying this ACEC recognition forward in the current management plan in order to carry out this plant conservation as part of the broader BLM landscape management.

The BLM Rock Springs Field Office has among the highest concentration of BLM sensitive plant species in all of Wyoming (USDI BLM 2010), most of which are only found in Wyoming (state endemics). Surface disturbances are likely to impact sensitive plants with restricted ranges, and ensuing population declines potentially lead to listing under the Endangered Species Act. So their conservation is a matter of state and national importance. Six of these state endemic species are mentioned by name in the Management Plan (Appendix C, p. C-47) as conserved. However, the Appendix C maps of ACECs show locations for just four of the six species. One of the six mentioned species without an ACEC boundary map is Large-fruited bladderpod (*Lesquerella macrocarpa*; syn. *Physaria macrocarpa*). It has a major population center that falls within the Red Desert Watershed ACEC as appropriate to incorporate into the recognized conservation values of this particular ACEC. The other species mentioned as protected but with no ACEC identified in the Plan is Green River greenthread (*Thelesperma caespitosum*). It is found nowhere else in the world with only three populations so we nominate BLM lands for ACEC recognition at one or both of its two largest populations to carry out the letter and spirit of language in the 2024 Plan.

The Plan states that the six sensitive species could be removed from the list or other species may be added to the list because Special Status Species listings change over time. The Green River Resource Area Plan (USDI 1997) didn't necessarily represent the most current BLM sensitive species list (USDI BLM 2010)

or best available distribution data. Three more BLM sensitive species, including a state endemic and two regional endemics that are potentially vulnerable, have major parts of their Wyoming distribution in the BLM Rock Springs Field Office. Their distribution overlaps with the following ACEC boundaries as technical details to incorporate in the recognized conservation values of the corresponding ACECs:

- Long-awned alkali wildrye (*Leymus simplex* var. *luxurians*; syn. *Elymus simplex* var. *luxurians*), as well as the Basin big sage/Lemon scurfpea vegetation, are located in the West and East Greater Sand Dunes ACEC
- Meadow pussytoes (*Antennaria arcuata*) is located in the South Pass Historic Landscape ACEC
- Ownbey's thistle (*Cirsium ownbeyi*) is located in the Red Creek ACEC

There are two more BLM sensitive species that are not addressed in the Plan at all, nor do they overlap with recognized ACECs in it: Stemless beardtongue (*Penstemon acaulis*) and Beaver Rim phlox (*Phlox pungens*). The phlox has more populations and larger populations in other field offices than the Rock Springs FO, but the penstemon has one of its largest known populations on BLM lands in the planning area that we nominate it for ACEC recognition.

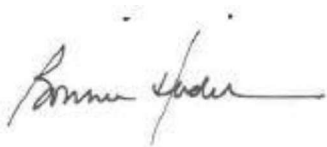
There are additional details to address. While the population boundaries as they appeared in the 1997 document were probably the best available ones for identifying possible ACEC areas at that time, it is important that they be reviewed for accuracy and completeness, set at a scale conducive to management, and reviewed as basis for finalizing ACEC boundaries to encompass the particular sensitive species populations on BLM lands. Other ACECs presented in the 2024 Plan have management-based boundaries without squiggly outlines tracing such biological details. Finally, we note that there are one or more possible overlaps between the state endemic species mentioned in this letter with Wilderness Study Area (WSA) boundaries as appropriate to recognize and incorporate as part of the respective WSA records.

It's exciting to see BLM planning, policy and fieldwork come together in the 2024 document. Points we raise in this letter are essential in coordinating efforts to minimize impacts on special status plant species and their habitats and reduce the possibility of listing these species under the ESA.

Wyoming Native Plant Society has a new Conservation Committee that can be contacted at wynps@wynps.org, and we wish to be added to the project mailing list.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bonnie Heidel", with a stylized flourish at the end.

Bonnie Heidel, Chair

Conservation Committee