Public Outreach Report
of the Comprehensive Travel and Transportation Management Plan
for the
Rock Springs Field Office
Resource Management Plan
and Associated
Environmental Impact Statement

August 2013

BLM

Wyoming High Desert District – Rock Springs Field Office

Mission Statement

The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

Public Outreach Report

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Comprehensive Travel and Transportation Management Plan

for the

Rock Springs Field Office

Resource Management Plan and Associated Environmental Impact Statement

for

Public Lands Administered

by the

Bureau of Land Management
Rock Springs Field Office, Wyoming

August 2013

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EXECUTIVE SUMMARY

This report documents the public outreach process for the Bureau of Land Management's (BLM) Rock Springs Field Office Comprehensive Travel and Transportation Management Plan (CTTMP). The CTTMP will be incorporated into the ongoing Rock Springs Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS). This report summarizes the BLM's public outreach efforts and comments provided by the public, as well as federal, state, and local government agencies. The purpose for the public outreach process is to learn how, where, and why people access their public lands and identify issues that should be considered in the CTTMP.

Public meetings were held in three locations within and in the vicinity of the Rock Springs Field Office: Rock Springs, Lyman, and Farson, Wyoming. Comments were accepted in various formats to ensure that those who wished to participate were able to do so effectively.

Chapter 1 describes the public outreach process and presents an overview of the current situation in the planning area. Chapter 2 reports the results of the public outreach process and provides a summary of the comments that were received during the public outreach period. Chapter 3 identifies issues that will be considered in the travel and transportation planning process. Chapter 4 identifies issues that will not be considered as part of the planning process and provides justification for not considering these issues. Chapter 5 identifies the planning criteria to be used throughout the planning process. Chapter 6 reports data identified by the BLM and the public during the public outreach process. Chapter 7 provides a general schedule of the planning process, identifying opportunities for public input.

CTTMP OVERVIEW

The CTTMP is the implementation of transportation decisions presented in the RMP that will be analyzed in the EIS associated with the RMP. The CTTMP will be used to designate BLM-managed routes for specific uses within the boundaries of the field office. The planning area includes approximately 3.6 million acres of surface land and 3.5 million acres of federal mineral estate administered by the BLM in portions of Lincoln, Sweetwater, Uinta, Sublette, and Fremont counties in southwestern Wyoming.

PUBLIC OUTREACH AND ISSUE IDENTIFICATION

Throughout the public outreach period, 13 individuals, agencies, and groups provided comment submissions concerning the future transportation management of the planning area. Within these submissions, analysis of 97 unique comments (Appendix A) resulted in the identification of issues to be addressed during development of the CTTMP. Many of the comments stressed the importance of transportation routes in the planning area, both for public access and commodity uses. The protection of backcountry areas, wildlife, and other sensitive or limited resources through road closures or other types of transportation management comprised another major theme in the comments.

CHAPTER 1—INTRODUCTION

The BLM Rock Springs Field Office is revising the existing Green River RMP and preparing an associated EIS. As part of the planning process, the field office is implementing route designations that will be determined through preparation of a CTTMP, which will be incorporated into the ongoing RMP revision. Transportation planning involves the reasoned and organized development of a plan that provides access to the planning area for multiple uses, including recreation, mineral development, and livestock operations.

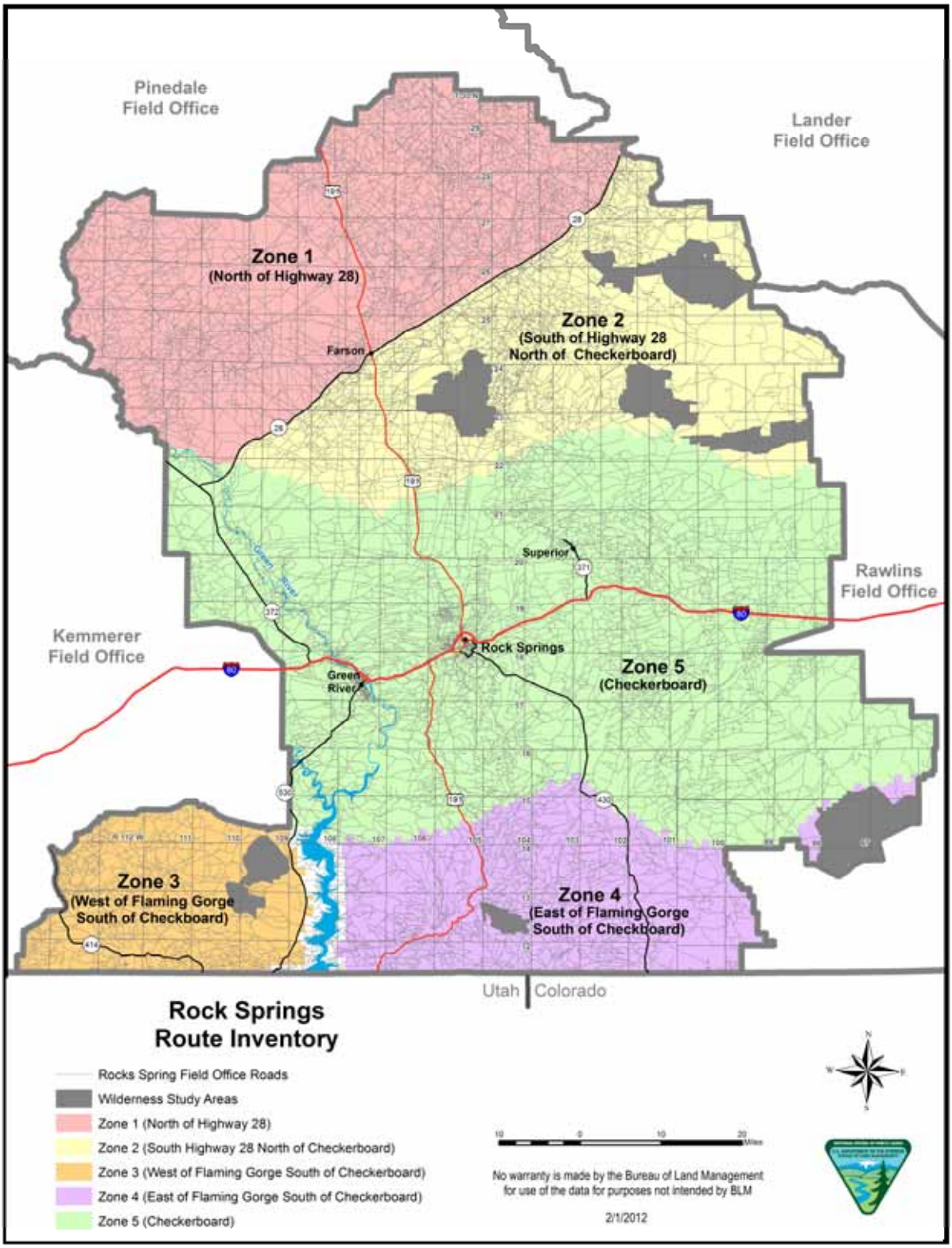
The Rock Springs CTTMP is being conducted under the authority of the Code of Federal Regulations (CFR) Title 43, Part 8340, which sets forth the purpose and objectives of off-highway vehicles (OHV) areas, route designation, and vehicle use and standards on BLM-administered lands. OHV area designations have been established since the Record of Decision (ROD) for the Green River RMP was signed in August 1997. The Jack Morrow Hills Coordinated Activity Plan completed in July 2006 also established and changed OHV area designations in a portion of the Rock Springs RMP planning area. Additionally, the ongoing RMP process will review and modify OHV area designations. The CTTMP will address all routes within the planning area and designate all routes for specific uses. The inventory of all existing routes within the planning area was initiated in 2005, using data from on-the-ground surveys and from federal, state, and county route databases.

The Rock Springs planning area includes approximately 3.6 million acres of BLM-administered surface land and 3.5 million acres of BLM-administered mineral estate in portions of Lincoln, Sweetwater, Uinta, Sublette, and Fremont counties in southwestern Wyoming. The Rock Springs Field Office administers approximately 13,000 miles of roads, ways, and trails, which connect to federal highways and state and local roads and rights-of way (Figure 1). The route inventory shown in Figure 1 was developed by consolidating data from the BLM Rock Springs Field Office route survey (conducted 2005 through 2012), census records (TIGER data), and Wyoming State Office data (digitized from imagery).

The CTTMP planning process was initiated to run concurrently with the Rock Springs Field Office RMP revision, which officially started with the publication of the Notice of Intent (NOI) in the *Federal Register* on February 1, 2011. The NOI announced the Rock Springs Field Office's intent to prepare an RMP with an associated EIS. The CTTMP will be analyzed in that same EIS. A public news release on October 29, 2012 (Appendix B) announced the start of the public outreach period for the CTTMP, which ended on January 11, 2013. The scheduled completion date for the CTTMP is the fall of 2015.

The objective of public outreach is to involve the public in the planning process. The public outreach process is used to identify planning issues, develop planning criteria, and evaluate the existing land use plan and transportation decisions in the context of the public's travel and transportation needs and interests. The BLM conducted a series of public outreach meetings, which were held in Rock Springs, Lyman, and Farson Wyoming, November 13, 14, and 15, 2012, respectively. These meetings provided an opportunity for the public to learn about the CTTMP process, ask questions, and provide comments. This report describes the public outreach process, summarizes the comments received, and identifies issues raised in the comments.

Figure 1. Rock Springs Route Inventory



CHAPTER 2—PUBLIC OUTREACH COMMENTS

Public comments were collected over a 60-day public outreach period, which began with a news release (Appendix B) on October 29, 2012, and ended on January 11, 2013. Comments collected during this period are summarized and addressed in this report. However, the BLM will consider issues brought forward any time during the planning process.

Public input helps identify issues important to the management of the area, as well as issues and conflicts to be examined in the planning process and ultimately, decisions in the CTTMP. The public outreach process is designed to encourage public participation and to solicit public input.

During the public outreach period, many individuals; federal, state, and local land management agencies; and public interest groups submitted comments, suggestions, and data and voiced concerns to the BLM regarding the CTTMP. The BLM offered various methods in which comments could be submitted. Comments were collected at the public outreach meetings, mailed to the Rock Springs Field Office, and/or emailed to RockSpringsRMP_WY@blm.gov. A total of 13 submissions were collected during the public outreach period, 2 from the public outreach meetings and 11 via email. Some of the commenters mailed a hard copy of their comments, but these same comments were also emailed, resulting in a total of 13 unique comment letters submitted.

PUBLIC OUTREACH MEETINGS

The BLM announced, via a press release on October 29, 2012 (Appendix B), they would hold local public outreach meetings. Three public outreach meetings were held in Rock Springs, Lyman, and Farson, Wyoming, November 13, 14, and 15, 2012, respectively. The meetings were conducted in an open house format from 4:00 to 6:30 p.m., allowing attendees to arrive and depart freely during that time. Informational posters were displayed throughout the meeting room, which provided specific project-related information (Appendix C). Hardcopy comment forms were provided at the meetings to allow attendees to draft written comments, which could be submitted at the outreach meetings or mailed to the BLM Rock Springs Field Office. In addition to the public meetings, the BLM held a meeting with Cooperating Agencies in Rock Springs, Wyoming, on November 13, 2012.

Meeting Attendance

Attendance at each of the public outreach meetings was recorded using a sign-in sheet at the registration station. Table 1 shows the locations, dates, and registered attendance for each outreach meeting.

Table 1. Outreach Meeting Locations and Attendance

Meeting	Meeting Date	Registered Attendance
Cooperator Meeting, Rock Springs, WY	November 13, 2012	26
Public Meeting, Rock Springs, WY	November 13, 2012	32
Public Meeting, Lyman, WY	November 14, 2012	1
Public Meeting, Farson, WY	November 15, 2012	11
Total		**70**

NUMBER AND TYPE OF COMMENTS RECEIVED

After the public outreach period ended on January 11, 2013, the comment submissions were entered into a database. Each comment letter was read in its entirety, and all distinct comments were recorded and analyzed. From among the 13 respondents, 97 substantive individual comments were identified (Appendix A).

Individual comments were categorized by primary topic regardless of the position of the commenter. Several comments addressed more than one comment category or topic. These comments were categorized by the primary topic. Comments that did not discuss a resource or resource use issue addressed by the RMP, but instead provided input on planning or policy issues were categorized as "Planning Process and Policy." The comment analysis process equally considered all comments, based on the issues raised and information provided. The outcome of these comments and subsequent analysis is the formulation of a list of planning issues (see Chapter 3) that the CTTMP will seek to address.

Table 2 shows the number of comments received by topic/issue category. This enumeration is not intended to show bias toward any particular issue; rather, its purpose is simply to convey the interest level in a specific issue/area.

Table 2. Comments Received by Category

Comment Category	Number of Comments
Planning Process and Policy	9
Roads	10
Access	8
OHV Use	3
OHV Area Designations	6
Travel Management Areas	1
Route Designations	8
Non-transportation Resources	44
Non-transportation Resource Uses	2
Non-transportation Special Management Area Designations	6
Total	**97**

SUMMARY OF COMMENTS

Before categorizing the written comments, comment categories were developed to organize the comments. Following is a summary of the comments received, organized by comment category. Appendix A includes all comments submitted during the public outreach period.

Planning Process and Policy (9 comments)

Planning Process comments are those that address the planning process in general. Comments addressed the need to conduct the CTTMP at this time and whether it should be conducted at all. One comment suggested that the process should only present the inventory and the latest geo-spatial data and that the

CTTMP is politically motivated and should be limited to the engineering requirements of BLM Manual 9100. Similarly, another comment suggested that the BLM has years of past decisions, planning documents, maps, budgets, and so forth, which constitute a transportation management plan which the BLM should not dismiss by creating a new CTTMP. Another comment suggested that asking the public and grazing association to identify every possible road or trail needed to sustain operations is too large a task and not necessary. At least one commenter suggested outright that the process should be terminated entirely.

One comment encouraged the BLM to consider the multiple-use mandate of the Federal Land Policy and Management Act (FLPMA) while considering road designations, specifically speaking to the need of roads for oil and gas development to remain open. Another comment expressed broad support for the planning process because it would protect sportsmen access. Another particular comment addressed road closures, claiming that because current laws and BLM policy prevent RMPs from making implementation decisions that the same should apply for the CTTMP. Lastly, a comment regarding illegal use of OHVs stressed the need for the CTTMP to address adequate law enforcement and funding.

Roads (10 comments)

This category contains comments that addressed the BLM public road network from a general perspective. Several comments in this category expressed opposition to road closures in general, while others expressed a desire to designate all currently open roads as “open” or to minimize road closures to only areas where it is absolutely necessary for sensitive resource protection. At least one comment brought up the need for the CTTMP to address temporary/emergency closure of roads. Signage was addressed in one comment; particularly the need to sign closed areas such as Wilderness Study Areas (WSAs).

Some comments advocated the use of roads primarily for recreational purposes, while others advocated the use of roads for industry, commercial, or official uses. One comment in particular expressed a need to differentiate travel management (primarily for recreation) from transportation management (primarily for resource use and development) in the CTTMP. A variety of comments addressed road networks created for oil and gas development, with some in favor of closing such roads to the public and others in favor of keeping these roads open to the public. A related comment expressed the desire to close and reclaim oil and gas infrastructure roads once development is complete.

A few comments addressed the roads inventory, some praising the latest inventory while others stated that a real-time inventory was not needed, pointing out that many of the roads on the maps at the public outreach meetings were not actual roads.

Access (8 comments)

There were two major concerns commented upon under the Access category. The first is that access to public lands, as well as neighboring private lands should remain in place. The need for this in the checkerboard is expressly mentioned, as well as the need to protect adjacent property owners from trespass, and to maintain access where valid existing rights are held. One suggestion related to valid existing rights suggested that public closures could take place as long as industry continued to have needed access. The second major theme related to access is the issue of Revised Statute (RS) 2477. Commenters expressed a desire that RS 2477 routes remain open.

OHV Use (3 comments)

While various comments recognized OHV use as a major form of recreation in the field office, only three comments focused directly on OHV use, and these were largely general in nature. Two comments expressed a feeling that recreational OHV use was very popular in the area and that the CTTMP should specifically address it and give it priority over other uses. A third comment focused specifically on over-the-snow vehicles, expressing the desire that currently open over-the-snow use areas remain open, especially along the Continental Divide Snowmobile Trail.

OHV Area Designations (6 comments)

Although there were no comments pertaining to the designation of specific routes, some comments discussed areas in which routes could be designated, as well as areas that could be designated for OHV use. One comment expressed the need for OHV areas to be designated as Open, Limited, or Closed to OHV use, while acknowledging that this would be part of the RMP process rather than the CTTMP process. More specific comments addressed Open areas specifically, one stated the need to create a "sacrifice" area near the towns of Rock Springs or Green River, Wyoming; another stated that the existing open area at the Killpecker sand dunes should be maintained or expanded. Another comment specified that the Limited to Existing OHV area designation should be done away with, only allowing Limited areas to include "designated" routes. Other comments requested OHV use limitations within the Jack Morrow Hills Coordinated Activity Plan area and the Red Creek Badlands.

Travel Management Areas (1 comment)

Only one comment mentioned travel management areas, stating broadly that the CTTMP should divide the planning area into different travel management zones for analysis purposes.

Route Designations (8 comments)

Although comments under this category did not identify specific routes for designation, there were many comments that suggested specific areas and general types of routes to be considered. Several comments suggested areas where routes should be closed, such as Cedar Mountain, or where routes could be closed, even if only seasonally, to protect big game hunting. Areas within the Jack Morrow Hills Coordinated Activity Plan area and the Red Creek Badlands were also suggested for closure. Other comments provided general tips for route closure and consolidation, such as removing redundant or parallel routes. At least one comment suggested that some routes that appear to be going to the same place provide much needed redundancy for better access, such as to access grazing allotments.

A couple of comments suggested rights-of-way should be consolidated. Lastly, one comment addressed the need for redesignation of routes from one type of use to another, such as designating formerly motorized routes for bicycle use.

Non-transportation Resources (44 comments)

Nearly half of the comments from the public outreach related to natural resources in the field office, rather than transportation directly. All of the 44 comments in this category related to either wildlife and their habitat or soils. There were no comments specifically related to cultural or paleontological resources, air resources, or other resource issues.

Several comments addressed trout specifically and stream protection in general, including aquatic systems, hydrographic change, water quality (turbidity and chemical composition), stream bank damage, riparian areas, and the maintenance of Properly Functioning Condition. These comments addressed stream issues in terms of the damage caused by stream crossings of roads and recreational OHV use. Some related comments addressed riparian areas in general being impacted by the use of a large number of roads, as well as disturbing animal species that depend on riparian areas to survive. One comment discussed habitat fragmentation associated with roads proliferation. Several comments address the damage from transportation on sensitive and biological soil crusts, as well as erosion and other soil concerns.

Many comments addressed limiting route designations, preventing new road construction, and seasonal road restrictions in areas important for sage-grouse and sage-grouse habitat protection. These comments specifically requested a moratorium on road building within three miles of leks; seasonal closures during nesting periods; adoption of the recommendations of the National Technical Team on sage-grouse conservation; the protection of wet meadows, seeps, and springs; and the protection of sage-grouse winter concentration areas.

Several other specific species were addressed by outreach comments. These include protection for plovers; a two-mile buffer to avoid cliffs with nesting raptors; buffers around nests for golden eagles, ferruginous hawk, and burrowing owl; and avoidance of prairie dog complexes, swift fox denning areas, and pocket gophers.

Lastly, a set of comments were directed at the protection of big game species, including mule deer, elk, and pronghorn. Areas where commenters would like to see the transportation system avoid include crucial winter range, migration corridors, crucial winter yearlong ranges, severe winter relief ranges, and calving areas. Additionally, comments suggested that bighorn sheep wintering habitat should be closed seasonally and summer range also should be protected with no net loss of habitat as a goal.

Non-transportation Resource Uses (2 comments)

The two comments related to non-transportation resource uses were both aimed at protecting oil and gas uses and the valid existing rights of leaseholders. The comments cited BLM policy, case law, and the FLPMA requirements regarding multiple-use management.

Non-transportation Special Management Area Designations (6 comments)

Several comments were aimed at implementing transportation planning in special areas designated to protect wilderness and wildlife habitat areas. One comment recommended that the CTTMP protect priority conservation areas, including the greater Jack Morrow Hills area, Little Mountain, and the Adobe Town/Kinney Rim. Another comment recommends adopting the Heart of the West Conservation Plan into at least one alternative. Another couple of comments spoke specifically to protecting lands with citizen’s proposed wilderness and existing WSAs, including the need for the BLM to re-inventory and reassess wilderness characteristics in the Kinney Rim North and South units and Adobe Town Area B.

CHAPTER 3—ISSUES IDENTIFIED DURING PUBLIC OUTREACH

The BLM planning handbook defines planning issues as disputes or controversies regarding existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include resource use, development, and protection opportunities for consideration in the preparation of the RMP. Issues presented in this chapter will direct portions of the CTTMP analysis.

To generate the issues from public comments, all public comments were analyzed and key points were summarized. Each issue was identified as a position-neutral statement or question that sets the groundwork for development of alternative solutions to be analyzed in the EIS. The following sections present a compilation of all of the issues that were raised during the public outreach period. Issues are subject to change throughout the planning process as new conditions and/or information are identified. Issues are organized by comment category. Similar issues were grouped where possible. The categories below are organized alphabetically and are not ordered based on the number of comments received or perceived importance of the issues. Duplicate issues were listed only once.

Planning Process and Policy

- How will planning address the multiple-use mandate of FLPMA?
- What is the difference between travel management and transportation management and how do the two relate in the planning process?
- Will the CTTMP address enforcement and funding of transportation management?
- Will transportation planning comply with engineering standards and policies such as BLM Manual 9100?
- Will previous transportation decisions, such as closures, remain in effect?

Roads

- Should new road construction be allowed? How much, where, and for what reasons?
- How does the BLM collect and categorize roads in an inventory? How will the inventory be maintained and is it necessary?
- Will some roads be closed? How will closed roads be reclaimed?
- Will the plan address signage?

Access

- Will access to private inholdings be maintained, especially within the checkerboard?
- Will access be maintained where there are valid existing rights?
- Will public access be restricted on roads created by and for commercial use?

OHV Use

- How much and where will OHV use be allowed in the planning area?
- How will the CTTMP address impacts from OHV use?
- Will OHV use be developed and enhanced through the creation of new routes or trails?

- Will the CTTMP address seasonal OHV uses, such as over-the-snow vehicles?

OHV Area Designations

- Will OHV area designations be considered as part of the CTTMP?
- What areas will be open, limited, or closed to OHV use?
- Will the limited-to-existing OHV area designation be discontinued?
- Will new open OHV areas be considered around populated areas where OHV use is heavier?
- Will the Killpecker Sand Dunes be maintained or expanded as an open play area?

Travel Management Areas

- Will the planning area be divided into different Travel Management Areas (TMAs)?

Route Designations

- Which routes will be designated or closed?
- How will temporary or emergency route closures be addressed?
- What criteria will be used for route selection (e.g., redundancy, wildlife impacts, damaged or eroded soils)?
- Will some redundancy be left in the route designations for better resource access and/or variation in OHV terrain?
- Will route designations consider the type of vehicles (e.g., vehicle width, non-motorized)?

Non-transportation Resources

- How will the CTTMP address the impacts of roads and access on wildlife and wildlife habitat, especially special status species?
- Will seasonal limitations be considered to protect animals within their winter habitat?
- Will transportation planning consider the effects of habitat fragmentation?
- Will stream crossings be limited or engineered to protect streams, stream banks, and aquatic species?
- Will routes through sensitive soils or soil crusts be limited or engineered to protect soils and avoid erosion?

Non-transportation Resource Uses

- Will resource extraction and other permitted uses be considered in transportation planning?
- Will valid existing rights be honored?

Non-transportation Special Management Area Designations

- Will the CTTMP consider landscape-scale conservation areas, either for ecological or recreational benefits?
- Will transportation in priority conservation areas be limited?
- Will the CTTMP consider the avoidance of travel in areas with wilderness characteristics?

CHAPTER 4—ISSUES OUTSIDE THE SCOPE OF THE CTTMP/EIS

Some of the issues raised during public outreach were outside the scope of the CTTMP and therefore will not be considered in the planning process. The following are three justifications for removing these issues from consideration:

- **Justification 1:** The BLM does not have authority to resolve the issue raised. The BLM is granted certain authorities through federal law that are implemented by the *Code of Federal Regulations*. Issues falling under this justification are usually resolved through congressional or judicial action.
- **Justification 2:** The issue raised is not germane to the planning process. An issue is not germane to the planning process if it is beyond the scope of a particular planning effort, or if it involves a matter normally addressed in plan implementation. Issues that are not germane to the planning process will not be considered as issues but treated as comments.
- **Justification 3:** The issue raised is addressed through law, regulation, or other policy or administrative action. This includes BLM standard operating procedures and policies or federal laws or regulations.

Issues in this chapter are organized by comment category. The issues presented in this chapter do not include those presented in Chapter 3 and are being dismissed from further consideration due to the reasons listed in the bullets above.

Issue Raised	Justification for Dismissal	Reason
Will the CTTMP designate routes on RS 2477 claims?	**Justification 1** Outside BLM Authority	The BLM does not have the authority to make binding determinations on the validity of RS 2477 right-of-way claims. Right-of-way claims under RS 2477 will be administered through judicial review.
How will funding be addressed?	**Justification 2** Not Germane	Funding to implement decisions contained in the RMP or CTTMP is not part of the planning process but is managed through congressional budget decisions, followed by BLM state and local field office yearly budget planning.
Can the CTTMP process be terminated and/or redesigned?	**Justification 2** Not Germane	The decision to conduct the CTTMP concurrently with the Rock Springs RMP revision is supported by BLM Manual MS 1626, which states that *"…travel management planning can either be completed concurrently with the resource management plan or deferred to an implementation plan."* Furthermore, the CTTMP should be conducted as soon as possible after completion of a route inventory to ensure the most up-to-date data is used in making route designations.
To what extent will transportation routes and decisions be monitored after completion of the CTTMP?	**Justification 3** BLM Policy	Monitoring actions are determined by national strategy and are authorized and managed through BLM policy.
Will the BLM re-inventory and manage for new lands with wilderness characteristics based on changes in citizen's proposals?	**Justification 3** BLM Policy	BLM Manual 6303 states: "If the project is in conformance with the existing land use plan, the BLM manager shall make an initial determination as to whether or not wilderness characteristics, as defined by BLM Manual 6301, are clearly lacking in the area affected by the project." Since the CTTMP is being conducted concurrently

Issue Raised	Justification for Dismissal	Reason
		with the RMP revision, it is considered to be in conformance with the latest inventory for lands with wilderness characteristics and will consider such natural resources in accordance with FLPMA's multiple-use mandate.

CHAPTER 5—DRAFT PLANNING CRITERIA

Planning criteria are constraints or ground rules developed to guide and direct the planning effort. Planning criteria are based on laws and regulations; guidance that the BLM leadership and counsel provide; results of consultation and coordination with the public, other agencies, governmental entities, and Indian tribes; and analysis of information pertinent to the planning area, public input, and professional judgment. The planning criteria focus on the development of management options and alternatives, analysis of the related effects, and selection of the Preferred Alternative and the Proposed RMP. Additional planning criteria may be identified as the planning process progresses. Preliminary planning criteria include the following:

- The proposed CTTMP will be in compliance with FLPMA and all other applicable laws, regulations, and policies.
- Impacts from the management alternatives considered in the CTTMP will be analyzed in an EIS developed in accordance with land use planning regulations at 43 CFR 1610 and National Environmental Policy Act (NEPA) regulations at 40 CFR 1500.
- Lands covered in the CTTMP planning area will consist of public surface estate managed by the BLM. No decisions will be made relative to non-BLM administered lands or split estate lands.
- For program-specific guidance, the implementation planning process will follow the concurrent RMP revision and EIS, patterned after BLM Manual 1601, *Land Use Planning*; Appendix C of the BLM's *Land Use Planning Handbook* (H-1601-1); BLM Manual 1626, *Travel and Transportation Manual*; and the BLM's *Travel and Transportation Management Handbook* (H-8342-2).
- Broad-based public participation will be an integral part of the planning and EIS process.
- If the other agencies, tribes, and/or governments have officially approved or adopted resource-related plans, then the land use plan (i.e., the Rock Springs RMP and the CTTMP) must, to the maximum extent practical, be consistent with their officially approved and adopted resource-related policies and programs, so long as the land use plan is consistent with the policies, programs, and provisions of public land laws and regulations [see 43 CFR 1610.3-2 (b)].
- The RMP will recognize the State's responsibility and authority to manage wildlife. The BLM will consult with the Wyoming Game and Fish Department (WGFD).
- The RMP will recognize valid and existing rights.
- The CTTMP will implement management decisions brought forward from existing planning documents and the concurrent RMP revision.
- The planning team will work cooperatively and collaboratively with cooperating agencies and all other interested groups, agencies, and individuals.
- The BLM and cooperating agencies will jointly develop alternatives for resolution of resource management issues and management concerns.
- Transportation and access in WSAs will be managed according to BLM policy for Lands under Wilderness Review to preserve their wilderness values until Congress either designates all or portions of the WSA as wilderness or releases the lands from further wilderness consideration.

The BLM will analyze lands with wilderness characteristics as part of the CTTMP planning process.

- Geographic Information System (GIS) and metadata information will meet Federal Geographic Data Committee (FGDC) standards, as required by Executive Order 12906. All other applicable BLM data standards also will be followed.
- The planning process will involve American Indian tribal governments and will provide strategies for the protection of recognized traditional cultural uses.
- All proposed management actions will be based on current scientific information, research and technology, and existing inventory and monitoring information. Where practicable and timely for the planning effort, additional scientific information, research, and new technologies will be considered.
- A Mineral Potential Report, Cultural Resources Overview Report, Biological Assessment, Socioeconomic Baseline Report, and Reasonable Foreseeable Development Scenario For Oil and Gas (RFD) will be completed and used as part of the RMP revision process and incorporated into the CTTMP analysis.
- The RMP will include adaptive management criteria and protocols as appropriate to deal with future issues.

CHAPTER 6—DATA SUMMARY/DATA GAPS

During public outreach, the public was encouraged to identify issues to be considered in the CTTMP. Individuals, organizations, and agencies also were encouraged to provide the BLM with applicable data that could assist in alternatives development and/or alternatives analysis. New data and data gaps were required to be identified beyond casual reference. Public comments that simply made statements of preference (e.g., a map showing known routes the commenter desires to remain open) were not considered new data. The primary data source for the CTTMP will be the recently completed route inventory mentioned in Chapter 1. Additional route data were received from Sweetwater County, which will be combined with the BLM data to create one consolidated route dataset that will be carried forward into the planning process. Should there be data gaps, the BLM will comply with NEPA regulation 40 CFR 1502.22 (Incomplete or Unavailable Information).

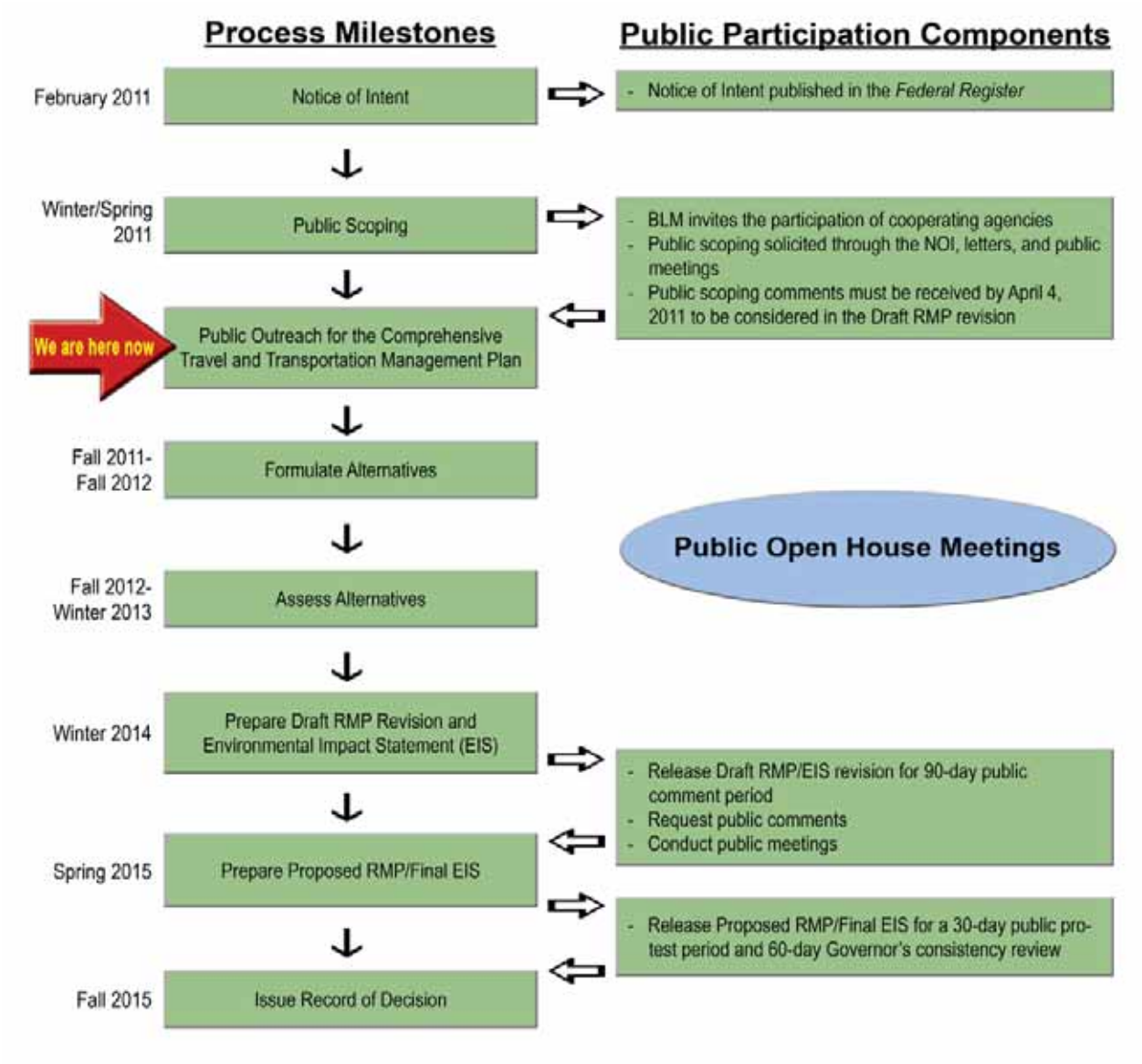
The public responded to requests for data by providing data in various formats along with their comments. All of the public-provided data will be available to the interdisciplinary team during the CTTMP planning process. Data that the public, organizations, and other agencies provided during public outreach are as follows:

- Scientific research and reports
  - Bibliographies and references
  - An excerpt from *The Report on National Greater Sage-Grouse Conservation Measures*
- Maps depicting areas desired to remain open to over-the-snow vehicles and areas, such as the Killpecker Dunes, which are desired to remain open to OHV use
- A GIS shapefile depicting comprehensive location information for roads and trails in Sweetwater County.

CHAPTER 7—CTTMP PLANNING SCHEDULE

The Rock Springs Field Office CTTMP planning team will use the data collected during the public outreach process and issues identified in this report to develop management decisions and generate a range of management alternatives. Following alternatives development, the planning team will evaluate the potential environmental consequences of implementing each alternative and select the Preferred Alternative. The BLM will issue a draft CTTMP in tandem with the Draft RMP/EIS, which will be followed by a 90-day public comment period. The BLM will review the public input on the draft document, make any needed revisions, and issue the proposed CTTMP along with the Proposed RMP/Final EIS. Following a 30-day protest period and 60-day Governor's consistency review, the BLM will resolve any protests, sign a ROD, and issue the final CTTMP together with the Approved RMP. Figure 2 presents the general planning schedule for the RMP/EIS, including opportunities for public involvement.

Figure 2. CTTMP Planning Schedule



APPENDIX A—COMMENTS SUMMARY

INTRODUCTION

This appendix contains public comments received during the public outreach period. This includes all written comments received during the public outreach meetings as well as all hard copy letters and emails. Each comment letter was read and individual comments were identified and entered into an Access database. Each comment was categorized by the major resource/use raised in the comment. This appendix contains all the individual comments from that analysis process. As these comments are taken from public letters, they may contain inconsistencies in terminology, acronyms, references, or inconsistent or inaccurate policy statements. These were not corrected in this appendix. Terminology and acronyms were carried over from the original comments without an attempt to interpret or define them.

COMMENTS

PLANNING PROCESS AND POLICY COMMENT—ANADARKO PETROLEUM CORPORATION: The scoping notice states that "[The CTTMP is being] analyzed as part of the Rock Springs Resource Management Plan (RMP) revision. The CTTMP will be used to designate BLM-managed routes within the boundaries of the Rock Springs Field Office (RSFO) as either open, closed, or limited to specific uses." (emphasis added). When preparing the CTTMP as part of the Rock Springs RMP revision, the BLM must clearly understand the role and purpose of a Travel and Transportation Management Plan. "Comprehensive travel management planning addresses all resource use aspects, including recreational, traditional, casual, agricultural, commercial, and educational; and the accompanying modes and conditions of travel on public lands." See BLM Land Use Planning Handbook H-1601-1, Appendix C. As such, this includes the travel needs for all BLM-administered resource management programs for such purposes as mineral extraction, and energy production.

Lands in the RSFO management area are significant in their potential for development of oil and gas resources. BLM must ensure that a thorough and balanced examination of the opportunities for future development of oil and gas is undertaken by the Bureau. Restrictions to mineral access that would potentially preclude development should be minimized and only occur if fully warranted under the Federal Land Policy and Management Act of 1976 ("FLPMA"). 43 U.S.C. § 1701 et seq.

NON-TRANSPORTATION RESOURCE USES COMMENT—ANADARKO PETROLEUM CORPORATION: The BLM must also acknowledge existing rights, including oil and gas lease rights, and private surface and subsurface rights. The BLM is required by law to provide reasonable access to valid existing rights. 43 CFR §36.10(b). The BLM is also required to "[M]anage the public lands under the principles of multiple use and sustained yield, in accordance with the land use plans developed by him under [43 U.S.C. § 1712] when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." 43 U.S.C. §1732 (a) (emphasis added).

PLANNING PROCESS AND POLICY COMMENT—ANADARKO PETROLEUM CORPORATION: The CTTMP Scope is Dictated by the FLMPA

The CTTMP, as a part of the Rock Springs RMP revision, cannot unreasonably limit access to areas open to oil and gas leasing. Under FLPMA the BLM is required to develop land use plans, termed as RMPs, to guide the agency's management of federal lands under its administration. 43 U.S.C. 1711 (2006). RMPs are designated to "guide and control future management actions." See Norton v. Southern Utah

Wilderness Society, 542 U.S. 55, 59 (2004) (citing 43 U.S.C. § 1712; 43 CFR § 1610.2). Federal lands and minerals are to be managed "in accordance with" the RMP developed by the BLM. 43 U.S.C. § 1732 (2006); 43 CFR § 1610.5-3(a) (2008). Development of RMPs is only the "preliminary step in the overall process of managing public lands." Norton v. Southern Utah Wilderness Alliance, 542 at 69. Interior Board of Land Appeals (IBLA) has similarly recognized that RMPs are not "static documents" which remain "fixed for all time." Southern Utah Wilderness Alliance, et al., 144 IBLA 70, 88 (1998). "On the contrary, for an RMP to have any ultimate vitality, it must be seen as a management tool which is necessarily circumscribed by the values and knowledge existing at the time of its formulation." Id Finally, the BLM's Land Use Planning Handbook specifies that RMPs are not normally used to make site-specific implementation decisions. See BLM Handbook H-1601-1, II.B .2.a, pg. l3 (Rel. 1-1693 3/11/05). Pursuant to controlling law, the CTTMP cannot, therefore, serve as a tool for imposing fixed access restrictions

NON-TRANSPORTATION RESOURCE USES COMMENT—ANADARKO PETROLEUM CORPORATION: Existing Lease Rights

Development of the CTTMP must acknowledge existing rights, including oil and gas lease rights. Once the BLM has issued a federal oil and gas lease which lacks any "no surface occupancy" stipulations, and in the absence of a nondiscretionary statutory prohibition against development, the BLM cannot completely deny development on the leasehold. See, e.g., National Wildlife Federation, et al. 150 IBLA 385, 403 (1999). "The review of the existing transportation system should recognize those routes managed by non-BLM entities with existing valid ROWs." See BLM Travel and Transportation Management Handbook H-8342- 1 (V) (d) (2011)

ACCESS COMMENT—ANADARKO PETROLEUM CORPORATION: Checkerboard Ownership

Development of the CTTMP must retain access to private inholding and checkerboard ownership. The BLM Inventory of Existing Transportation maps (see Attachments 1 and 2) provided in the public outreach materials illustrate five Travel Management Areas. Zone 5, Checkerboard Lands, illustrates the noncontiguous nature of ownership where APC holds considerable interest as private owner of surface and mineral inholdings. To meet the needs of both public and private lands, access must be preserved and the CTTMP should not include provisions that further hamper or imped necessary access

ACCESS COMMENT—ANADARKO PETROLEUM CORPORATION: It is well established that NEPA only requires an agency to consider "reasonable alternatives." 40 CFR § 1502.14 (2008). The BLM's obligation to consider alternatives is not without limitations. Courts and the IBLA have long held that "NEPA does not require agencies to analyze the environmental consequences of alternatives it has in good faith rejected as too remote, speculative, or impractical or ineffective." Citizens' Comm. To Save Our Canyons, 297 F.3d at 1030-31. When developing alternatives for the Rock Springs RMP and accompanying EIS, which would incorporate the CTTMP, the BLM must ensure that alternatives analyzed in the EIS are both feasible and economic. The Council on Environmental Quality ("CEQ") has described reasonable alternatives as "those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable." CEQ's Forty Most Asked Questions, Question 2a, 46 Fed. Reg. 18028, 18027 (Mar. 23 1981) (emphasis added). The BLM need not analyze speculative, impractical, or uneconomic alternatives. Citizens' Comm. To Save Our Canyons, 297 F.3d at 1030-31. For example, alternatives designating routes as closed or limited prohibiting adequate and feasible access to valid existing oil and gas lease rights, and private and subsurface inholdings is neither practical nor reasonable and need not be studied in detail by the agency.

ACCESS COMMENT—ANADARKO PETROLEUM CORPORATION: FLPMA mandates that the BLM manage public lands on the basis of multiple use, thereby utilizing the lands' resources that will "best meet the

present and future needs of the American people." 43 U.S.C. § 1701(a) (7), (12); § 1702(c) (1976). To successfully manage the public lands under the RSFO jurisdiction, all parties should work together to maintain and establish reasonable access to public and private lands and minerals. APC encourages the BLM to establish goals and objectives of the CTTMP to 1) provide access on public lands; 2) provide administrative, commercial, and private land access where necessary; 3) discourage and reduce trespass on adjacent private lands; and 4) identify future planning needs and opportunities related to travel management.

OHV USE COMMENT—BENTON PHELPS: Our family often vacations by taking All Terrain Vehicle (ATV) trips to various locations. It is how our family spends time together, and allows all of us to visit remote places otherwise inaccessible to us.

We plan on visiting Wyoming, and when we do, we look forward to spending much of that time riding.

Please don't take this family opportunity away from us.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: BLM has potential wilderness lands scattered throughout the Rock Springs Field Office, and on these lands the agency should prohibit the construction of roads or other features that are inconsistent with maintaining the wilderness characteristics found there.

ACCESS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: In general, we support public access. If motorized use is limited for the public, it should be equally limited for commercial users of the public lands, including oil and gas lessees, grazing permittees, and other commercial interests. BLM should avoid creating 'second class citizens' by closing areas to public access while allowing continued access for commercial users of the public lands, as has occurred on the Pinedale Anticline gas field. Wildlife are sensitive to disturbance to vehicular use and human presence regardless of whether the vehicle causing the disturbance is being operated by an oil and gas worker, grazing permittee, or member of the public at large.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We have some specific concerns regarding the potential impact of vehicular use on different types of sensitive wildlife, which have been shown to abandon habitat or incur other costs such as increased stress or cost of movement when disturbed at sensitive periods or in sensitive habitats. In many cases, these problems can be mitigated through seasonal closures that apply across the board to commercial permittees and lessees, administrative access by BLM employees, and the public. This type of travel management has been commonly undertaken across the nation by the Forest Service, but has rarely been implemented by the BLM.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We urge the BLM to adopt standards that minimize soil compaction in the first place, rather than putting the emphasis on reclaiming damaged soils after the fact.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The widespread destruction of biological soil crusts can have long-term impacts on soil and plant productivity, and the BLM must incorporate into its land management directives standards which prevent these impacts from occurring.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The sensitivity of biological soil crusts to off-road vehicle travel make it imperative that the BLM restrict vehicles to designated roads and trails.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: For the long-term health of rangelands and wildlife habitats, the recovery of biological soil crusts should be fostered to enhance the health of rangelands throughout the planning area.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: In the EIS/RMP documents of the 1980s, the BLM reported the existence of dismal streamside conditions along most watercourses on public lands. The current condition of these stream zone/riparian areas must be re-addressed to assess current conditions and to document where improvements still need to be made. Thus, riparian areas of high biological concern should receive special protection under the new Travel Management Plan, which should include explicit standards to manage these areas to achieve Properly Functioning Condition.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The new RMP should include a comprehensive strategy for limiting impacts to aquatic systems, including numeric standards on levels of hydrographic change (through both depletions and additions), change in water quality (both turbidity and chemical composition), and aquatic indicator species that can serve as the "canary in the coal mine," triggering changes in management activities before an ecological disaster can occur. These measures are part and parcel of a responsible Travel management system.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: In order to maintain healthy fisheries, the BLM must maintain healthy watersheds, especially riparian areas. This can be aided by siting vehicle routes away from riparian areas and closing unnecessary vehicle routes that are leading to damage to riparian vegetation.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Road development can lead to lek abandonment (e.g., Braun 1986). In western Wyoming, Lyon (2000) found that for sage grouse leks within 3 km of oil and gas developments, grouse hens successful at raising their broods selected habitats farther from roads than unsuccessful hens. This finding indicates that habitats near roads experience reduced brood survivorship. Thus, we seek a moratorium on all road-building within 3 miles of a lek site until such time that seasonal road use measures can be effectively implemented to prevent impacts during the breeding and nesting seasons.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We urge the BLM not only to avoid the proliferation of new roads and user-created vehicle routes in nesting habitats but also to schedule events away from nesting habitats and avoid scheduling them during the nesting period.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: A Blueprint for Sage Grouse Conservation and Recovery by Dr. Clait Braun, arguably the world's leading expert on sage grouse conservation provides recommendations for sage grouse conservation, was submitted to the BLM during the planning process but was ignored by BLM (Braun 2006). Dr. Braun's recommendations constituted a reasonable alternative based on the best available science that would place a moratorium on the constructions of roads and other infrastructure for the important nesting habitat that occurs within 3 miles of a sage grouse lek. BLM should consider the implementation of these recommendations in at least one of the agency's alternatives, and adopt these recommendations as standards in the new TMP.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We recommend that the BLM adopt the recommendations of its National Technical Team regarding sage grouse conservation measures, excerpted in relevant part and attached to these comments as Appendix A.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Mesic meadows and surface waters are focal points of sage grouse activity during certain times of year. Mesic sites associated with springs, seeps, and streams are critical for sage grouse on a yearlong basis, and assumes even greater importance as brood rearing habitat (Autenreith et al. 1982). Management for sage grouse should include special emphasis on protecting wet meadows, springs, and seeps. Special provisions are needed to protect these habitats.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: And Braun (2005) recommended even larger buffers of 3 miles from lek sites where surface disturbance and vegetation treatments should be prohibited, based on the uncertainty of protecting sage grouse nesting habitat with smaller buffers. Thus, areas within 3 miles of a sage grouse lek should be put under year-round stipulations preventing habitat alterations.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Brood-rearing habitats should thus be identified and managed to maximize sage grouse recruitment success; this includes planning systems of open roads to avoid these areas when possible.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The BLM must identify sage grouse wintering habitats within the planning areas and emplace strong measures to protect them from road construction and vehicle-related disturbance.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: In the Travel Management Plan, the BLM needs to rapidly identify sage grouse winter concentration areas and restrict surface disturbance on them as necessary to maintain healthy habitat conditions.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The TMP should explore the potential impacts of roads and vehicle traffic on plovers and design a system that minimizes impacts to plovers, avoiding nesting concentration areas wherever possible.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: BLM should avoid new road construction adjacent to cliffs where raptor nesting occurs.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: BLM should establish adequate nest buffers (on the order of 2 miles in diameter) around nest sites, preventing all construction of developments (such as wells and roads) that would lead to future disturbance of nesting raptors through focusing human activities in these areas. Seasonal restrictions are insufficient; a well or road constructed outside the nesting season is still likely to lead to nest abandonment or reductions in recruitment due to disturbance from vehicle traffic that does occur during the nesting period.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Not only should nest buffers be implemented, but the overall integrity of the landscape should be maintained (or improved in areas where it is currently degraded) in order to better provide for raptor viability.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The maintenance of viable golden eagle populations should be an important consideration in the new TMP.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Buffers at least 1 mile prohibiting road construction should apply to ferruginous hawk nest sites as well as all other raptor nest sites.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Burrowing owl populations are highly susceptible to stochastic disturbances such as drought, and thus may decline more rapidly than would be predicted on the basis of demographic factors alone (Johnson 1997). In Wyoming, data suggest an overall population decline, with 17.5% reoccupancy of historic sites, but the spotty quality of historical data makes comparisons difficult (Korfanta et al. 2001). The burrowing owl has been identified as a species of concern by both the BLM and the Wyoming Game and Fish Department.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We would like to see the Rock Springs Field Office manage for prairie dog complexes large enough to support ferret reintroduction; at present, complexes west of the Kinney Rim may be the strongest candidate.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: In their conference opinion on the Seminoe Road Coalbed Methane Project, the USFWS recommended that activities which might disrupt denning swift fox be prohibited between March 1 and July 31 (Long 2001). Denning areas should be identified and protected from any activities that threaten the viability of swift fox populations; this should include seasonal road closures.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Habitat destruction is the primary threat to T. clusius. Habitat fragmentation and isolation also threaten T. clusius. Continued oil and gas development creates increasingly dense road networks, diminishes corridors for dispersal, and further separates populations. Roads act as barriers to finding mates, leading to inbreeding and loss of gene flow within individual populations. Habitat fragmentation results in shrinking islands of intact habitat with increased exposure to edge effects. The impacts of disturbances associated with road construction are a major concern, and road construction should avoid occupied Wyoming pocket gopher habitats.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Mule deer and elk are important game species in the Rock Springs Field Office. These game animals contribute importantly to the Wyoming economy, both from hunting and wildlife viewing visitors. The Rock Springs Field Office includes important winter range for deer and elk populations that summer in the surrounding mountains, as well as resident populations. Thus, protections to maintain the viability of elk and mule deer are needed across the Rock Springs Field Office, an these protections should be focused on crucial winter ranges, migration corridors, crucial winter yearlong ranges, severe winter relief ranges, and calving areas identified by the Wyoming Game and Fish Department.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Thomas et al. (1988) asserted that hiding and thermal cover are critical components of elk winter range, and that patches of cover greater than 200m wide are more effective than smaller blocks. With this in mind, extensive security areas comprised of forested habitat must be retained on winter ranges. In general, natural processes should prevail on winter ranges, and natural disturbances should be allowed to proceed unhindered by management. Limited extractive activities may be allowed in these areas if they are consistent with maximizing the habitat capabilities of terrestrial and aquatic wildlife.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Wintering elk, deer, and bighorn sheep are sensitive to disturbances of all kinds. Both snowmobiles and cross-country skiers are known to cause wintering ungulates to flee (Richens and Lavigne 1978, Eckstein et al. 1979, Aune 1981, Freddy et al. 1986). Because flight response may be particularly costly to wintering ungulates (Parker et al. 1984), disturbance on winter ranges should be avoided at all costs. As a result, winter ranges will be closed to both motorized and nonmotorized entry from November through April.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Several studies have shown that closed-canopy forests are required by elk for thermal cover during summer (Patterson 1996, Millspaugh et al. 1998, Cooper and Millspaugh 1999). Hiding cover may be an important or even limiting factor in predominantly open habitats; Patterson (1996) found that in a study area where woodlands made up only 8% of the landscape cover, wooded habitat was the most important variable determining elk distribution. According to this study, the average size of woodland patches used by elk was 9 times greater than average patch size, and elk preferred thermal cover of trees during summer. For this reason, the BLM should avoid road construction or fragmentation in wooded patches in the primarily open areas in the RSFO that are elk habitat.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: On winter ranges, elk are highly susceptible to disturbance. They are so sensitive to human disturbance that even cross-country skiers can cause significant stress to wintering animals (Cassirer et al. 1992). Ferguson and Keith (1982) found that while cross-country skiers did not influence overall elk distribution on the landscape, elk avoided heavily-used ski trails. Disturbance during this time of year can be particularly costly, since the metabolic costs of locomotion are up to five times as great when snows are deep (Parker et al. 1984). The regular vehicle traffic associated with roads constitutes a significantly higher threshold of disturbance, and thus would cause even greater stress to the animals. Thus, all human activities should be prohibited on elk winter ranges between November 15 and April 30.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Several studies in the RSFO area have shown that elk abandon calving and winter ranges in response to oilfield development. In mountainous habitats, the construction of a small number of oil or gas wells has caused elk to abandon substantial portions of their traditional winter range (Johnson and Wollrab 1987, Van Dyke and Klein 1996). Drilling in the mountains of western Wyoming displaced elk from their traditional calving range (Johnson and Lockman 1979, Johnson and Wollrab 1987). Powell and Lindzey (2001) found that elk avoid lands within 1.5 kilometers of oilfield roads and well sites in sagebrush habitats of the Red Desert. Migration corridors may in some cases be equally important to large mammals and are susceptible to impacts from oil and gas development (Sawyer et al. 2005). Thus, roads should be closed in crucial elk winter range during the months of their occupancy, and other disruptive activities should be prohibited, as is done the Lander RMP DEIS preferred alternative.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Riparian areas are the primary summer range of mule deer in montane habitats (Compton 1974). Strickland (1975) found that riparian areas and clearcuts were important summer ranges on the Medicine Bow N.F., and that coniferous forest was utilized primarily for cover. Davis (1977) found that mule deer on the Medicine Bow used clearcuts and natural parks about equally, and used burns more heavily than clearcuts. Wallmo et al. (1972) found that clearcuts and roadsides could be temporarily important foraging habitats for mule deer, but pointed out that forage available in clearcuts declines after 10 years post-cut, as saplings begin to crowd out understory plants. Mule deer avoid parts of clearcuts that are farther than 300 feet from cover, and thus large clearcuts have limited use as mule deer summer range (Strickland 1975). Compton (1974) found that mule deer on the western slope of the Sierra Madres summered on desert shrub, mountain shrub, and aspen communities. The BLM should manage summer ranges for the benefit of mule deer populations.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The ability of mule deer to forage effectively on winter ranges in a stress-free environment is the key to maintaining viable populations in this region. Winter mortality has claimed up to 80% of the adult mule deer population of southeastern Wyoming, and also depresses fawn production during the following spring (Strickland 1975). On winter ranges, mule deer are easily disturbed by snowmobile traffic and even nonmotorized visitors (Freddy et al. 1996). This can be a critical factor, because metabolic costs of

locomotion in snow can be five times as great as normal locomotion costs for mule deer (Parker et al. 1984). Thus, due to the sensitivity of mule deer to disturbance on winter ranges and the crucial nature of winter range performance to maintaining healthy deer populations, mule deer winter ranges must be withdrawn from all road construction and development, particularly oil and gas development, which would increase the level of human disturbance on these winter ranges.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We request that BLM develop stipulations for crucial winter range that result in no net loss of habitat function pursuant to the WGFD Mitigation Policy.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Winter range is critically important to pronghorn populations, as its availability and quality is likely the strongest determinant of population dynamics. Barrett (1982) reported that during a severe winter in Alberta, overall pronghorn mortality was 48.5%, with fawns and adult males taking particularly heavy losses. This same study documented that pregnant female pronghorns resorbed their fetuses when conditions were poor. Deep winter snows also decrease the survival rate of fawns born the following spring (Cook 1984). Emergency supplemental feeding is ineffective in promoting pronghorn survival during severe winter weather (e.g., Julian 1973, Barrett 1982). Thus, it is critically important to be sure that the winter ranges are maintained in the best possible condition.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Cook (1984) noted that densities of pronghorns on winter ranges were lowest in areas of “severe” oil and gas development. This result indicates that oil and gas development tends to drive pronghorns away from winter range areas. Given the likelihood that vehicle traffic and human activity, rather than the well equipment itself, is the ultimate cause of pronghorn displacement, we recommend seasonal closures for all vehicles on pronghorn crucial winter ranger from November through April.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: A number of studies point out that roads are one of the most important causes of trout habitat degradation, and that habitat damage and water quality degradation are unavoidable consequences of road construction (Rhodes et al. 1994, Henjum et al. 1994, NMFS 1995, USFS and USBLM 1997a,b). This damage persists over the long term and is difficult to reverse (Furniss et al. 1991, Rhodes et al. 1994, NMFS 1995, Espinosa et al. 1997). Habitat damage resulting from road construction also has the indirect effect of granting competitive advantages to introduced species at the expense of native trout (Behnke 1992, Duff 1996). Road construction effects can also increase water temperatures (Meehan 1991), which can help brook trout to permanently displace native cutthroats (Behnke 1992). As a result of these factors, a number of scientists agree that reductions in the extent of road networks are essential to protecting and restoring trout habitats (Henjum et al. 1994, Rhodes et al. 1994, USFS and USBLM 1997a). Road sprawl associated with oil and gas development can also have major effects on watersheds. Eaglin and Hubert (1993) used culvert crossings of streams as an index of road density, and found that this measure was positively correlated with increased stream siltation.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Habitat fragmentation occurs whenever there is a change in the spatial continuity of the habitat that affects occupancy, survival or reproduction in a particular species, whether or not a net loss of habitat accompanies the spatial change (Franklin et al. 2002). Oil and gas development, with its sprawl of drilling pads, access roads, and pipelines, is a primary cause of habitat fragmentation in certain parts of the Bighorn Basin.

Although the portion of the landscape physically disturbed by roads, well pads, and pipelines is often a relatively small percentage of the overall landscape, GIS analysis of full-field oil and gas development

incorporating quarter-mile buffers to account for habitat degradation due to edge effects indicates that almost 100% of lands within a fully developed gas field are degraded (Weller et al. 2002). In this way, the development of an oil and gas field results in widespread habitat destruction that extends well beyond the acreage of roads and well pads that are bulldozed in.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Several researchers have weighed in on prioritizing areas for conservation protection. Fertig and Thurston (2001) concluded that Great Plains and intermountain shrub steppe plant communities are underrepresented in the federal system of protected landscapes. According to the USGS (1996), "The highest priority should be given to protecting vegetated dunes, active sand dunes, forest-dominated riparian, shrub-dominated riparian and grass-dominated wetlands and riparian areas because their current protection is minimal and because they are potentially the most vulnerable to ongoing land management practices." These researchers examined lands protection from an ecological standpoint, but it is also important to protect treasured wildlands from a social and recreational standpoint, to save these outstanding landscapes for future generations.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We recommend that BLM adopt the Heart of the West Conservation Plan as a framework for managing a system of core habitats and connecting linkages so that viable populations of wildlife will be maintained throughout the Bighorn Basin. See http://www.voiceforthewild.org/Heart_of_the_West/index.html. This plan was developed using the SITES modeling process, by inputting the habitat requirements of key indicator species, rare biological elements, and other known correlates of habitat quality and ran the model exhaustively to identify the areas of greatest ecological importance. Within this conservation framework, the Absaroka Front rates highest among Bighorn Basin lands for vulnerability and irreplaceability (Jones et al. 2006). Areas not selected by the model, identified as Compatible Use Areas, would be appropriate for industrial development as long as it is done in a way that minimizes impacts. We recommend that at least one alternative adopt the recommendations of this framework, which we incorporate by reference into our comments.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We recommend that all Lands with Wilderness Characteristics and citizens' proposed wilderness areas be managed to prevent new road construction and limit vehicle use to designated vehicle routes. WSAs must be managed to not negatively impact the wilderness qualities of the area. Where ORV use would negatively impact the wilderness qualities (solitude, quiet, pristine, clean water, clean air, nonmotorized use) of the area, it should be prohibited. Citizens' proposed wilderness areas for which the BLM has already received past citizen inventories include Adobe Town, the Kinney Rim North and South units, as well as Buffalo Hump, Sand Dunes, Parnell Creek, Alkali Draw, the Pinnacles, South Pinnacles, The Big Empty, Oregon Buttes, Whitehorse Creek, Oregon Buttes Badlands, the Joe Hay Rim, and Honeycomb Buttes in the Jack Morrow Hills CAP area; these inventories were resubmitted during scoping for the Rock Springs RMP and we incorporate them into these comments by reference. In addition, BCA is currently preparing new field inventories for Red Creek Badlands, Elk Mountain, East Sand Dunes, and Red Lake, and these should be submitted this winter. A field inventory of Devils Playground is partially complete, and is likely to be submitted in fall of 2013. All of these areas should receive the recommended special management with regard to travel planning as outlined above.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Section 202 of FLPMA states, "…develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands. Land use plans shall be developed for the public lands regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses." However, the authority set forth in

Section 603(a) of FLPMA to complete the three-part wilderness review process (inventory, study, and report to Congress) expired on October 21, 1993; therefore, Section 202 of FLPMA does not apply to new WSA proposals and consideration of new WSA proposals on BLM-administered public lands is no longer valid. However, we recognize that in many cases the BLM will need to respond to the Citizens' Proposal for Wilderness on BLM lands by conducting inventories of the subject lands to determine whether they do indeed possess the wilderness characteristics of size, naturalness, or outstanding opportunities for primitive, unconfined recreation or solitude. These inventories will determine if some or all of these do indeed possess one or more of the above wilderness characteristics as well as determine whether they are manageable as wilderness. In addition, irregularities in inventory conclusions in the BLM LWC assessments for the Kinney Rim North and South units and Adobe Town Area B warrant a BLM re-inventory and reassessment of these lands. Accordingly, measures to provide protection for any wilderness characteristics of these lands, in addition to the previously established WSAs, should be considered in the alternatives of the TMP.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: Off-road traffic also results in increased erosion. Hinckley et al. (1983) found that ORV use destroys the micro-topographic roughness of soil surfaces, resulting in simpler, more direct drainage patterns and faster runoff velocity. Soils disturbed by ORVs may become subject to wind erosion where they were resistant before disturbance, particularly desert flats, badlands, and playas (Gillette and Adams 1983). In order to protect soils, vehicles should be limited to existing roads and trails and nonmotorized areas should be established to provide quiet backcountry recreation opportunities.

OHV AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: The BLM's current policy restricting motor vehicles to existing roads and trails is a bit ambiguous: "Existing" is in the eye of the beholder; a wild horse or game trail might be viewed by some as an "existing" trail open to motorized use. Furthermore, a track created through illegal use becomes "existing" and thus open to subsequent users, which further increase the wear and entrenchment of the route. Thus, restricting motorized use to "existing" roads and trails has been a recipe for the proliferation of user-created routes, precisely the opposite outcome to what was intended by the regulation. We recommend that motorized use would occur only on designated routes throughout the planning area.

OHV AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We would like vehicle travel limited to "designated routes" rather than "existing routes" in both the Jack Morrow Hills area and in the Red Creek Badlands area, as well as preferably in all current proposed wilderness study areas.

- Designated routes will be limited to those which minimize damage to soil, harassment of wildlife, and conflicts with other recreational users.
- We would prefer the BLM act swiftly to designate and label routes that will be open to vehicle use as required by the Jack Morrow Hills Coordinated Activity Plan (RSFO, 2006, Page 72) which states that off-highway vehicle (OHV) use in the Red Desert Watershed Management Area will be "limited to designated roads and trails." To date, we see no evidence that the BLM has made any effort to designate travel routes in the Red Desert Watershed Management Area or any of the Areas of Critical Environmental Concern as required in the Jack Morrow Hills CAP.

OHV AREA DESIGNATIONS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We would also like to request the posted closure and decommissioning of non-designated routes, including those that are impassable and redundant, in the above listed areas but especially in the following units:

- Jack Morrow Hills: According to the Jack Morrow Hills Coordinated Activity Plan (RSFO, 2006, Page 71), "specific roads and trails may be closed…to OHV use as needed for public health and

safety reasons, restoration or remediation actions, habitat protection, or other valid reasons as determined by BLM."

- Red Creek Badlands: The Red Creek Badlands Citizens Proposed Wilderness Area, stretching from the existing Wilderness Study Area of the same name south to the Teepee Mountains and west to Richard's Gap is crisscrossed with hundreds of OHV trails and routes, many of which are very steep and narrow, posing a threat to user safety especially in the Teepee Mountains. Others damage critical habitat, including several sets of tracks that were observed within the stream channel and in other delicate riparian areas causing salinization of the creek water, severe erosion, and destruction of crucial fish habitat. We are concerned that the level of unauthorized motor vehicle trail creation will lead to siltation and salt inputs into Red Creek, and potentially violate the terms of the Colorado River Salinity Control Forum. Other routes have sustained water damage that makes them impassable to many vehicles, and in such cases multiple alternate routes have been formed, propagating the impacts of the route and increasing erosion in the area. The area is currently marked with signs warning motorists to stay on "existing routes" but upon visiting the site it is clear that this is not enforced.

ROADS COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We are opposed to allowing oil and gas to close roads and routes in their active fields as this would limit public access to public land and would greatly inhibit the ability of citizens groups to preform citizen's wilderness inventories or other similar activities that rely on access to the land.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We recommend that all crucial big game winter ranges be closed for the winter to all OHV and vehicle traffic.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: We would prefer to see all known sage grouse leks closed to all vehicle traffic from late February through April, during their mating season. We would also prefer to see implementation of the "Travel and Transportation" portion of the Report on National Greater Sage-Grouse Conservation Measures (Sage Grouse National Technical Team, 2011, Page 11-12) of which the pertinent section is attached in Appendix A to these comments.

NON-TRANSPORTATION RESOURCES COMMENT—BIODIVERSITY CONSERVATION ALLIANCE: BLM should manage its transportation system to minimize impacts of wildlife and their habitats.

ACCESS COMMENT—COALITION OF LOCAL GOVERNMENTS: Under Alternative A, TT 002 states that the Jack Morrow Hills Area transportation plan would consider "closing and rehabilitating unused roads and trails and those causing resource damage . . . subject to county review of existing rights-of-way needs."

When making decisions on the roads or trails that will be restricted or closed, BLM cannot impair any holder of a valid existing right, e.g. R.S. 2477 rights-of-way and other pre- FLPMA rights. See Southern Utah Wilderness Alliance (SUWA) v. Bureau of Land Management (BLM), 425 F.3d 735, 748 (10th Cir. 2005). R.S. 2477 comes from the federal revised statute first enacted in 1866 as part of the Mining Laws and authorized establishment of public highways across the public domain. 43 U.S.C. §932 (repealed). From 1866 until its repeal by FLPMA, R.S. 2477 granted a "right of way for the construction of highways over public land, not reserved for public uses." Id. FLPMA preserved all preexisting rights-of-way as they existed on the date of passage, October 21, 1976. See 43 U.S.C. §§1701, n.1, 1769. R.S. 2477 was an "open-ended and self-executing grant" that requires no administrative formalities. Sierra Club v. Hodel, 848 F.2d 1068, 1083-84 (10th Cir. 1988).

ACCESS COMMENT—COALITION OF LOCAL GOVERNMENTS: The right-of-way interest created by the R.S. 2477 grant is in the nature of an easement, and the respective Counties own that right-of-way easement.

Kinscherff v. U.S., 586 F.2d 159, 160 (10th Cir. 1978). As a result, BLM lacks administrative jurisdiction over R.S. 2477 rights-of-way and has no authority to close or restrict any R.S. 2477 rights-of-way. SUWA, 425 F.3d at 748. Just as Alternative A calls for review of existing rights-of-way prior to any closing of roads, the other alternatives must also provide similar language and recognize existing rights-of-way.

ACCESS COMMENT—COALITION OF LOCAL GOVERNMENTS: The transportation plan should be developed in conjunction with the RMP revision or at least within five years of the plan implementation. H-1601-1, App. C' at 19. Before any planning is completed, road ownership issues should be resolved. Many of the roads and trails in the area date back to the homestead era and provide access to ranches, communities, and recreation. They are public roads (R.S. 2477 rights-of-way) that BLM has no jurisdiction over or authority to close or restrict access. Any management action in the RMP will only apply to BLM owned and administered roads and trails. All roads, including county roads and trails, must be displayed in the maps in the RMP and EIS.

The network of roads on public lands provide recreation access. While many were developed by ranchers and possibly improved for energy exploration, recreation users also use these roads.

The Taylor Grazing Act assures permittees access to the grazing allotment. 43 U.S.C. §315h. All of the grazing permits in the RSFO are active so there is a presumption that the roads are needed for the grazing permits and cannot be closed without determining that the road is not needed for permit use or administration.

OHV USE COMMENT—COALITION OF LOCAL GOVERNMENTS: Off-road recreation is very popular and the RMP needs to more fully develop the extent of the demand both present and future and tailor the RMP to meet this demand.

OHV AREA DESIGNATIONS COMMENT—COALITION OF LOCAL GOVERNMENTS: The designation and re-designation of trails is accomplished through the RMP process and every acre within the RMP boundary must be designated as open, limited, or closed to off-highway vehicle (OHV) use. 43 CFR §§8342.1, 8342.2; BLM H-8342, at 5; BLM M-1626.06(A) (2) (a) (1). Objective 6 of the OHV sub-section states: "clearly identify route and area designations." The objective would be more in line with the federal regulations if it stated "clearly identify route and area designations as open, limited, or closed to OHV use."

ROADS COMMENT—COALITION OF LOCAL GOVERNMENTS: The RMP must also address temporary closures and restrictions of areas and trails on public lands available to OHV use, which the Rock Springs RMP OHV sub-section does in OHV 007 and 014. see BLM H-8342, at 38; BLM M-1626.06(A) (2) (g). If an authorized officer determines that OHVs are causing or will cause considerable adverse effects on "soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources," then the officer must immediately close the affected areas. 43 CFR §8341.2(a). OHV 007 and 014 should also state that the "lands will be opened when the adverse effects have been eliminated and measures implemented to prevent reoccurrence."

ROUTE DESIGNATIONS COMMENT—GARY COY: No closure of any road or route that shows any sign of use such as no grass growing in the tracks. Oil field access to well pads that have been plugged and abandoned could be roughed up and reseeded. All other roads and routes are used by hunters, rancher-both cattle and sheep, and other recreationists such as rock hunters/photographers etc.

ROUTE DESIGNATIONS COMMENT—GARY COY: Roads that appear to go to the same place such as the top of a hill may be necessary to deliver supplies to a sheep camp and provide different access routes in case of muddy spots or snow drifts. Also roads that appear to run parallel on maps may be divided by rocky ridges or sand or deep washes. Anybody that has been trapped by blowing snow or sand or flash floods may be able to get out by alternate routes even though they are less desirable.

ACCESS COMMENT—GLENN LANSBERRY: Please leave the roads and trails alone do not close them down. I recreate and work on these public lands and appreciate the access the roads and trails provide. I strongly support access to public lands and multiple use.

ROADS COMMENT—GLENN LANSBERRY: We do not support the closure of any road, trail or access to public lands. Please do not close any roads or trails, large or small, two track or improved. Allow for multiple use on all roads and trails on BLM land (public land).

PLANNING PROCESS AND POLICY COMMENT—GREATER LITTLE MOUNTAIN COALITION: The Greater Little Mountain Coalition supports designated route systems and applauds the BLM for moving toward a designated route system in the Rock Springs Field Office.

Designated routes are a central component of effective OHV management on public lands, and are essential to protecting fish and wildlife for high quality fishing and hunting. As hunters, anglers and motorized users, we believe that a system of designated routes that eliminates cross country travel is the single most important step toward keeping our access open to reasonable motorized use and our wildlife populations robust.

Much like bag limits, draw entry hunts, catch and release and other rules that focus on planned use to provide more opportunity, designated route planning is a sensible idea to protect sporting and other recreational opportunity. Additionally, route planning helps users choose their experience and use maps to find locations suitable for the type of activity they desire.

Because of this, we believe there is broad-based support from sportsmen for route planning and encourage the BLM to move forward on this and other route designation plans

ROUTE DESIGNATIONS COMMENT—PHILIP BODE: While I realize that this is a starting point of public input on a just completed road inventory my primary concern is one of redesignation of roads from multi vehicle type to bicycle for example.

PLANNING PROCESS AND POLICY COMMENT—PHILIP BODE: The maps that re on display are small and mostly incomprehensible except in a macro form, small roads that are crucial for livestock watering and salt areas are difficult to ascertain as presented.

ROADS COMMENT—PHILIP BODE: Most roads in existence should be allowed to be used into the future with a moratorium on new road development.

PLANNING PROCESS AND POLICY COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: A. The presentation and discussion at the scoping meeting reflected a misunderstanding by contractors and staff regarding the topic and techniques of professional Transportation Planning. The BLM presentation should have been more correctly addressed as a conceptual inventory and presentation of the latest remote sensing digital data of apparent road, trail, and off-road use routes that exist on the public land... Thousands of miles of "linear happenings" over time on the public land. The objectives and purpose of the RMP Revision needs to be defined and reviewed. It appears to have been implemented to satisfy political interests and influence from those individuals and organizations absorbed with the RS2477

issues (Utah court decisions) rather than understanding that there is a more realistic and basic definition of Transportation Planning for resource management purposes, and as so defined in BLM Manual 9100 and related Handbooks and also being parallel to the policies and manuals of the USFS for National Forests Road Systems.

PLANNING PROCESS AND POLICY COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: B. BLM has with in its records, generations of planning documents, presentations, hearings, maps, and budget narratives etc. addressing the basic BLM Transportation Plan. Which is further defined as formal set of maps and plats with numbered BLM, County and State Roads necessary to access and management the public land for multiple use. Each BLM District (original BLM administrative unit) developed and maintained a set of these maps, referenced on daily basis by engineers, acquisition specialist, realty specialist, recreation specialist, industry and the public. In Wyoming, these maps were the basis of identifying and granting counties ROWs across public land in 1983. It documents legal access and roads intended to be necessary to move the public and materials in the orderly management of public land resources. These plans are often supplemented by other Transportation Plans specific to massive oil and gas developments (Wamsutter II, and others). The existing Transportation Plans were not identified or included in the scoping meeting and discussion. It appeared that the attending BLM staff and contractors did not know such Transportation Plan exists, but many attending agencies and members of the public did and so commented. It is unfortunate that BLM staff that work with and maintain the Transportation Plan were not in attendance, and appear not to be involved in the process.

C. The current RMP cannot throw out all previous engineering, resource, and NEPA decisions that were based on the information contained in existing Transportation Plan.

ROADS COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: D. To manage the public land resources and recreation uses the BLM does not need a real time inventory of all roads, trails, seismograph lines, oil field roads, and foot paths that exists on the public land at any point in time. Majority of "roads" shown on digital maps at the scoping meetings do not exist and are only linear disturbance that appears for satellite image. And those that do exist lacked any interpretation or identification of purpose on the maps.

ROADS COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: E. It appears the RMP is being used to legitimize various degrees of existing roads and trails into perpetuity with no justification, and using the RMP to legitimize without justification. Every oil and gas ES Decision Document will stipulate that oil and gas roads will be reclaimed. This RMP approach would confuse those requirements, if the recreation public want to play on it. There are documented discussions and recommendations to the Secretary of Interior regarding oil and gas development in the Green River Basin. Hearings conducted in Rock Springs, Rawlins, Craig and Vernal over 18 months discussed oil and gas roads at length and their impacts, The GRBAC committee concluded and recommended that BLM would not assume or take over these roads but they would be reclaimed, and the only formally recognized roads on or added to the existing Transportation Plan would be retained post development for the management of public land (Sec. of Interior's, Green River Basin Advisory Committee 1997).

PLANNING PROCESS AND POLICY COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: The approach of BLM at the Scoping Meeting would be parallel to asking Wyoming Department of Transportation to present maps of all paved roads, driveways, paths, parking lots, and interstates, and asking the public--is this correct, what do you need? Knowing full well WYDOT only has interests in highways. There has to be some reality incorporated into this discussion, and perhaps an independent consultant retained to direct the effort, one that is a professional in the field of Transpiration Planning.

F. To ask RSGA to identify every roads (and trail) needed for our operations over 2 million acres is unrealistic as conditions change with drought, winter snow cover, range conditions, and development of

private minerals. BLM is in no less a situation. RSGA supports the definition of the basic network of roads in the existing District Transportation Plan drafted in 1964 and based on existing truck trail networks established by livestock and timber over the previous 50 years. These roads being the skeleton of roads needed to manage the public land, until the boom in oil and gas in 1973, and a whole new set of roads were created by oil and gas industry.

ROADS COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: G. Travel Management is whole separate issue and without further definition it is not manageable information. As being discussed it appears to be an effort to document where there is recreational use of the land surface to operate four wheelers, dirt bikes, and mountain bikes. To develop a plan to manage this activity would be a whole separate issue not to be confused and Transportation Planning necessary to support the orderly development of public renewable and non-renewable resources. Travel Management is a recreation use issue.

PLANNING PROCESS AND POLICY COMMENT—ROCK SPRINGS GRAZING ASSOCIATION: Terminate and redesign the scoping and analysis of Travel Management and Transportation Planning as now attempted.

TRAVEL MANAGEMENT AREAS COMMENT—WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY: The Wyoming Department of Environmental Quality – Water Quality Division (WQD) supports breaking up the Rock Springs Planning Area into different zones for analysis and development of a Comprehensive Travel and Transportation Management Plan (CTTMP).

ROUTE DESIGNATIONS COMMENT—WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY: WQD supports alternatives which eliminate and reclaim duplicative and/or eroding roads, to reduce resource impacts.

PLANNING PROCESS AND POLICY COMMENT—WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY: A concern of the WQD is the extensive illegal use of offroad vehicles causing damage on BLM lands. Because of the limited amount of BLM law enforcement personnel, there is very little likelihood that perpetrators of this activity will be caught. The BLM needs to increase its presence of law enforcement personnel to reduce this activity in the Rock Springs Planning Area and on all BLM lands in the state. Although we recognize that this is not an RMP issue, this comment is included for the Washington Office to consider when allocating funding for BLM land management.

OHV AREA DESIGNATIONS COMMENT—WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY: Many areas around Rock Springs and Green River are heavily damaged from offroad vehicle use. The BLM needs to include an alternative that designates a “sacrifice” play area for off road vehicles near Rock Springs and Green River, so that impacts to other areas from ATVs are reduced. This issue was brought up several times during cooperator meetings, so it is not a new issue. During one cooperator meeting there was a lengthy discussion about transferring lands to Sweetwater County for an ATV play area. Although the county wasn’t willing to pursue this option at the time, that discussion clearly indicated a need and the BLM should have done the necessary ground work so an alternative that designates a “sacrifice” play area for off road vehicles could be analyzed. Obviously erosion and sediment transport from a play area are resource concerns; however a site could be selected where detention basins to trap sediment could be built.

NON-TRANSPORTATION SPECIAL MANAGEMENT AREA DESIGNATIONS COMMENT—WYOMING OUTDOOR COUNCIL: In the Rock Springs Planning Area, we have identified three priority conservation areas in which we advocate for the least possible development in order to preserve their recreational, aesthetic, and ecological values. These priority conservation areas are: the greater Jack Morrow Hills area, Little Mountain, and the Adobe Town/Kinney Rim landscapes.

ROUTE DESIGNATIONS COMMENT—WYOMING OUTDOOR COUNCIL: Our concerns for travel and transportation management in the Rock Springs planning area include enforcement of route closures and protected landscapes, greater consideration of route closures, minimization of new routes, and consolidation of rights-of-ways.

ROADS COMMENT—WYOMING OUTDOOR COUNCIL: While we recognize that motorized recreation is a valid use of public lands, we do advocate for it to be managed through enforcement of closed routes and protection for threatened landscapes. In particular, before new motorized recreational routes are opened, we advocate the field office allocate more funds for enforcement. As off-highway vehicles can increasingly access new terrain, it becomes more important to appropriately sign and close routes. This becomes very important around Wilderness Study Areas. In our experience, WSAs in the planning area are not well identified—what is particularly lacking is signage prohibiting motorized use along routes that lead to the WSAs. For example, while driving towards the Honeycomb Buttes, one never encounters a sign designating the WSA boundary and the need to access it in a non-motorized way. Motorized incursions into the Honeycomb Buttes, Oregon Buttes, Sand Dunes, and Adobe Town WSAs are common.

ROUTE DESIGNATIONS COMMENT—WYOMING OUTDOOR COUNCIL: Additionally, closure of motorized routes should be considered when motorized uses denigrate the values of other public land resources. For example, closure of routes should be a consideration to protect hunting opportunities. One area to consider this management decision is the Cedar Mountain area, where motorized routes are prolific. This is a significant big game hunting area. And during hunting season, closure of motorized routes should be considered to preserve quality hunting experiences.

ROUTE DESIGNATIONS COMMENT—WYOMING OUTDOOR COUNCIL: Route closure is also an effective management tool for mitigating habitat fragmentation. In countless landscapes across the planning area, multiple routes parallel each other only yards apart. Motorized routes are vectors for invasive species introduction, fragment habitats, and disrupt wildlife behavioral patterns. While travel and transportation routes are necessary for multiple use public land management, parallel routes and routes that lead from similar origins to similar destinations need to be managed through closures.

ROADS COMMENT—WYOMING OUTDOOR COUNCIL: Similarly, the field office needs to be thoughtful about approving new travel and transportation routes. The very complete inventory that was finished for this planning process is an excellent start—it provides a database for understanding if a new route is needed, or if an existing route will suffice. Using this inventory, we advocate the field office to be careful with approving new routes, especially as they pose ecological threats via invasive species introductions, fragmenting habitat, and disrupting wildlife behavior. We encourage the field office, in light of the density of roads in existence, to minimize new route construction.

ROUTE DESIGNATIONS COMMENT—WYOMING OUTDOOR COUNCIL: While minimizing new route construction, we also advocate for consolidation of travel and transportation rights-of-ways. While planning for future natural resource development, access routes and transportation rights-of-ways should be consolidated with existing routes in order to minimize surface disturbance. Routes should be shared, even if the developments are owned by diverse development companies. The goal should be minimization of the surface disturbance and habitat fragmentation caused by the development of new travel and transportation routes.

OHV USE COMMENT—WYOMING STATE PARKS: Please ensure the entire existing ‘Open to Over the Snow Vehicles’ area, located at the very northern edge of the Rock Springs Resource Area and depicted on ‘Map Inset A’ below, continues to remain open to cross-country travel by snowmobiles. This area hosts the Continental Divide Snowmobile Trail (CDST) which is designated as a Special Recreation

Management Area (SRMA) by the existing Resource Management Plan (RMP). Off-trail over-snow travel remains an extremely popular winter recreation use, along with CDST use, in this northern portion of Transportation Management Zone 1.

OHV AREA DESIGNATIONS COMMENT—WYOMING STATE PARKS: There is currently about 10,500 acres designated 'Open to Off-Road Vehicle Travel' in the Killpecker Sand Dunes area (green area on 'Map Inset B' at right), which is also designated as a SRMA by the existing RMP. This area offers a unique opportunity for motorized recreation in Wyoming, as well as the region. It is critical this 'Open' opportunity be retained, if not expanded in the new RMP, due to its popularity. Opportunities for travel on existing roads and trails across dune areas in the surrounding area are also extremely important and should be carried forward as the new travel plan and RMP are developed for Transportation Management Zone 2.

ROADS COMMENT—WYOMING STATE PARKS: While at this time we don't have comments or concerns about any existing roads and routes across all Transportation Management Zones, we know that use of enrolled BLM roads and routes provide important recreation opportunities across the Rock Springs Resource Area. We encourage you to continue providing maximum opportunities for travel routes as new management plans evolve while considering new closures in only the most truly sensitive areas under your management.

APPENDIX B—PUBLIC MEETING PRESS RELEASE

Release Date: 10/29/2012
Contacts: Serena Baker 307-212-0197

PUBLIC MEETINGS SCHEDULED FOR ROCK SPRINGS TRAVEL AND TRANSPORTATION MANAGEMENT PLAN

The Bureau of Land Management (BLM) Rock Springs Field Office (RSFO) will host three public meetings seeking input in drafting a Comprehensive Travel and Transportation Management Plan (CTTMP) which will be analyzed as part of the Rock Springs Resource Management Plan (RMP) revision.

The CTTMP will be used to designate BLM-managed routes within the boundaries of the RSFO as either open, closed, or limited to specific uses. The BLM is specifically interested in hearing how, where, and why people access their public lands and issues related to such access. This includes, but is not limited to, commercial access for grazing, oil and gas development and mining; recreational access for hunting, off-highway vehicle (OHV) use, hiking, and biking. The CTTMP will be incorporated into the ongoing Rock Springs RMP revision planning effort.

The public is invited to attend one, or all of the following meetings which will be held from 4-6:30 p.m. at the following dates and locations:

Tuesday, Nov. 13:	**Wednesday, Nov. 14:**	**Thursday, Nov. 15:**
Holiday Inn	Lyman Town Hall Courtroom	Eden Valley Community Center
1675 Sunset Dr.	100 E. Sage St.	4039 Highway 191 N.
Rock Springs, Wyo.	Lyman, Wyo.	Farson, Wyo.

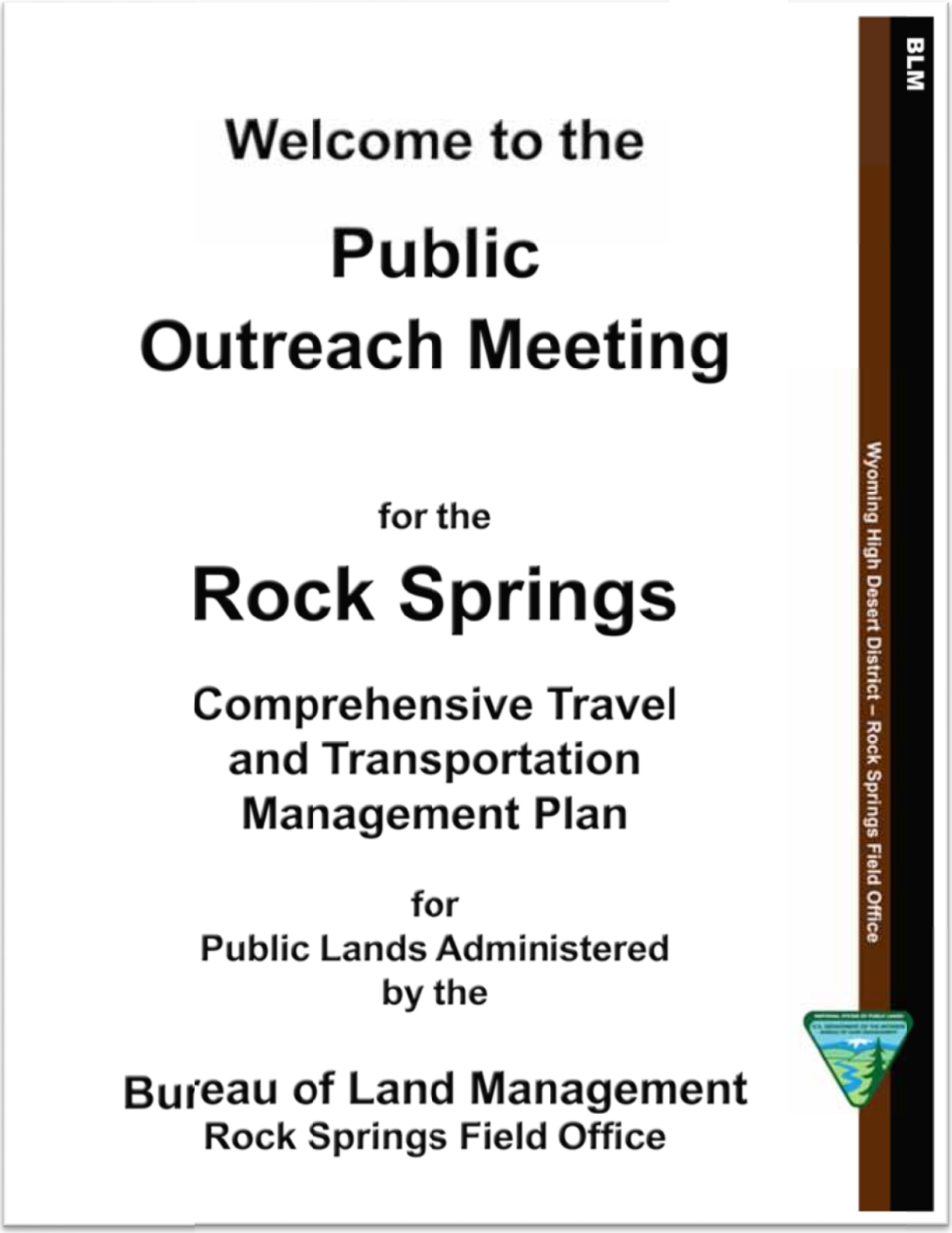
The meetings are part of the 60-day public outreach which continues until Jan. 11, 2013. Written, substantive comments may be submitted via email, mail, or hand-delivery to the RSFO during regular business hours (7:45 a.m.-4:30 p.m.):

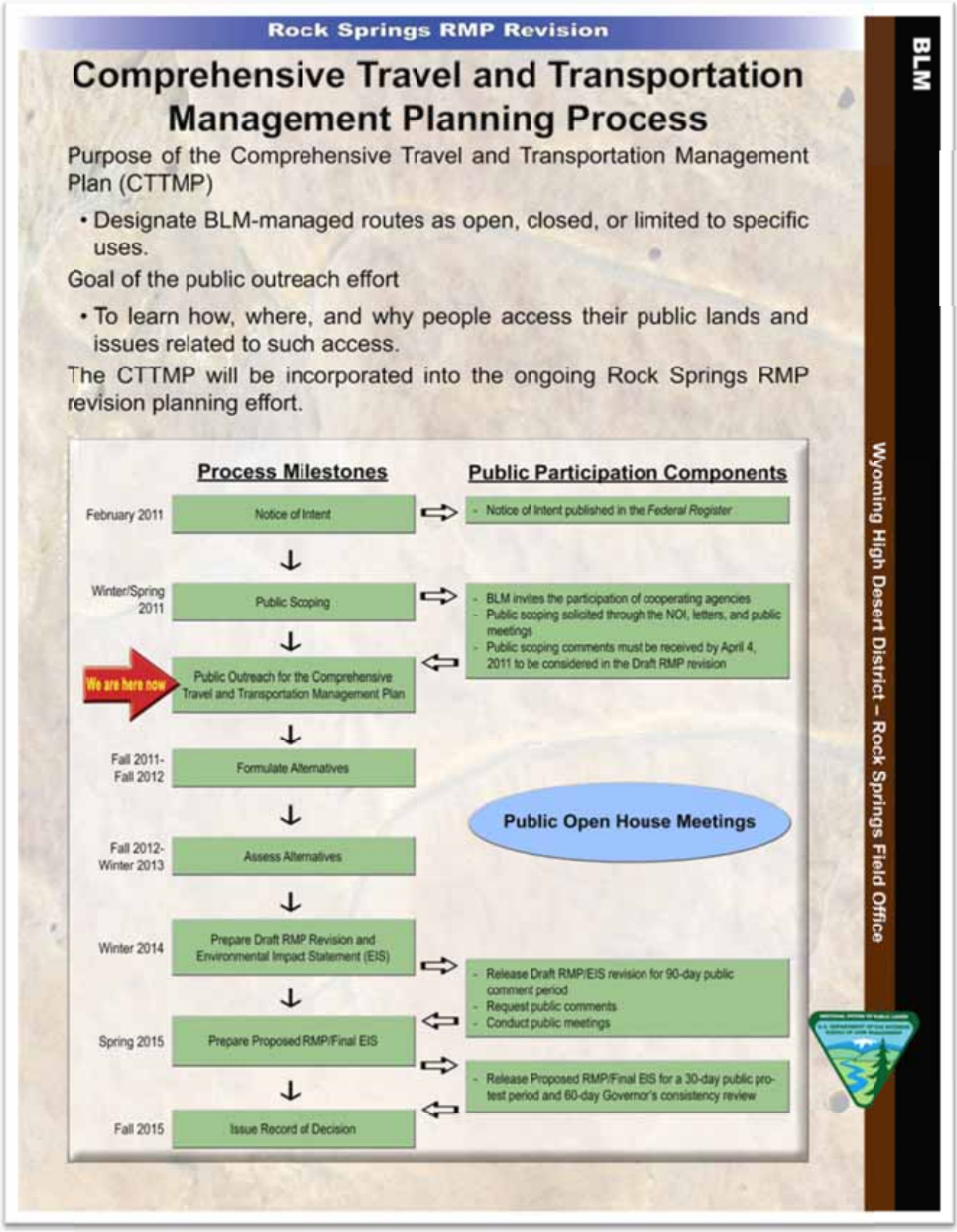
Vera-Lynn Harrison
Project Manager
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901
RockSpringsRMP_WY@blm.gov (Please include Travel Management in the subject line)

For more information, please contact Lynn Harrison at 307-352-0259.

Note to editor: More information about the Rock Springs RMP process can be found at:
www.blm.gov/wy/st/en/programs/Planning/rmps/RockSprings.html.

APPENDIX C—PUBLIC MEETING POSTERS




Rock Springs RMP Revision
Comprehensive Travel and Transportation Management Planning Process
Purpose of the Comprehensive Travel and Transportation Management Plan (CTTMP)
• Designate BLM-managed routes as open, closed, or limited to specific uses.
Goal of the public outreach effort
• To learn how, where, and why people access their public lands and issues related to such access.
The CTTMP will be incorporated into the ongoing Rock Springs RMP revision planning effort.
Process Milestones
Public Participation Components
February 2011
Notice of Intent
- Notice of Intent published in the Federal Register
Winter/Spring 2011
Public Scoping
- BLM invites the participation of cooperating agencies
- Public scoping solicited through the NOI, letters, and public meetings
- Public scoping comments must be received by April 4, 2011 to be considered in the Draft RMP revision
We are here now
Public Outreach for the Comprehensive Travel and Transportation Management Plan
Fall 2011-Fall 2012
Formulate Alternatives
Public Open House Meetings
Fall 2012-Winter 2013
Assess Alternatives
Winter 2014
Prepare Draft RMP Revision and Environmental Impact Statement (EIS)
- Release Draft RMP/EIS revision for 90-day public comment period
- Request public comments
- Conduct public meetings
Spring 2015
Prepare Proposed RMP/Final EIS
- Release Proposed RMP/Final EIS for a 30-day public protest period and 60-day Governor's consistency review
Fall 2015
Issue Record of Decision
BLM
Wyoming High Desert District – Rock Springs Field Office

Rock Springs RMP Revision

Providing Your Input

Public outreach comments must be received by January 11, 2013, for consideration in the Comprehensive Travel and Transportation Management Plan.

Ways to Submit Your Comments

TONIGHT: Written comments at this meeting

Fill out one of the comment forms provided and place it in the comment box.

LATER: Mailed or delivered

Fill out one of the comment forms provided at the public meetings or any other paper and deliver it in person to the Rock Springs Field Office or by mail to:

Rock Springs Field Office, Bureau of Land Management
Attn: Vera-Lynn Harrison, Project Manager
280 Highway 191 North
Rock Springs, WY 82901

LATER: Email

Submit comments by email to the following address: RockSpringsRMP_WY@blm.gov

BLM

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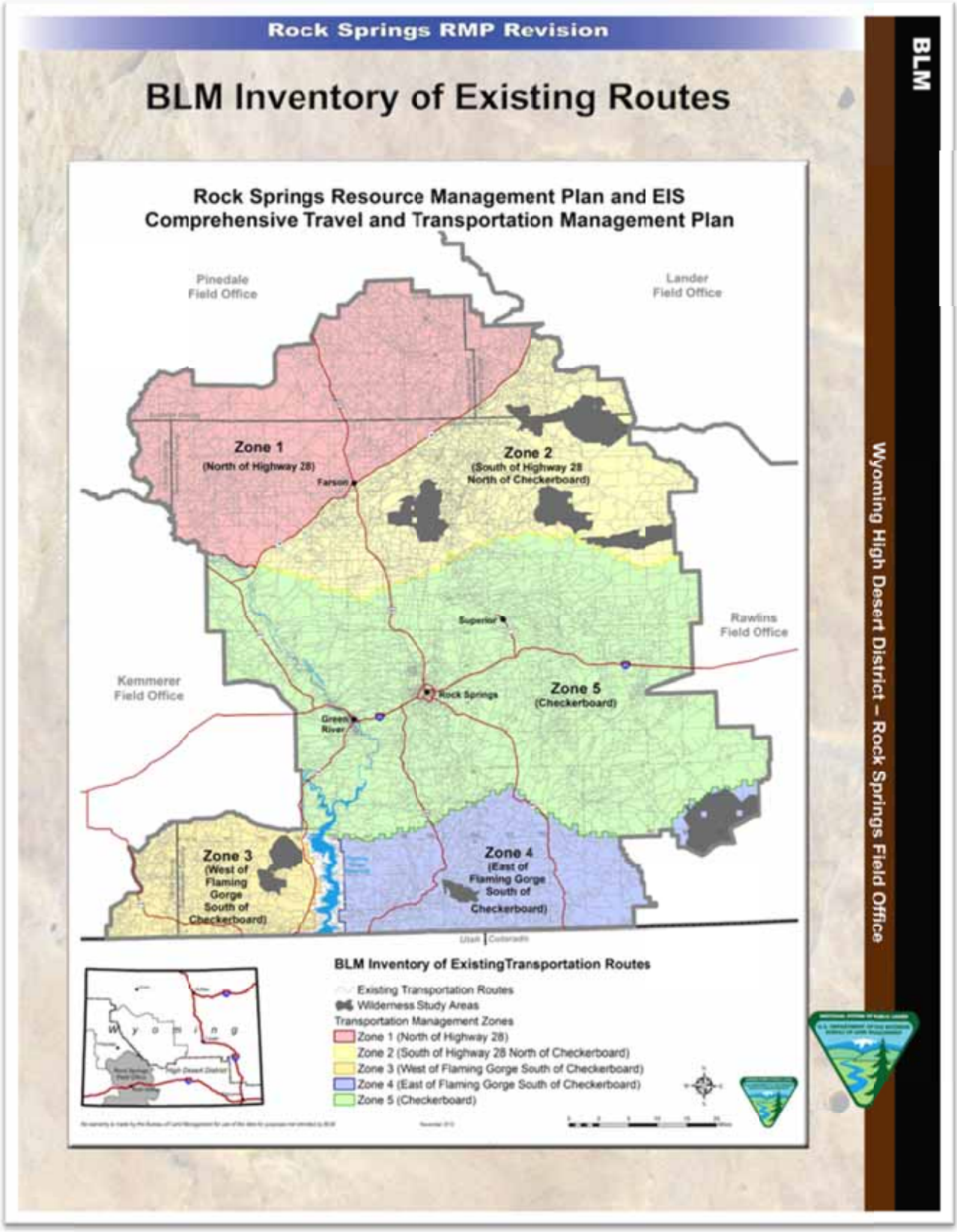
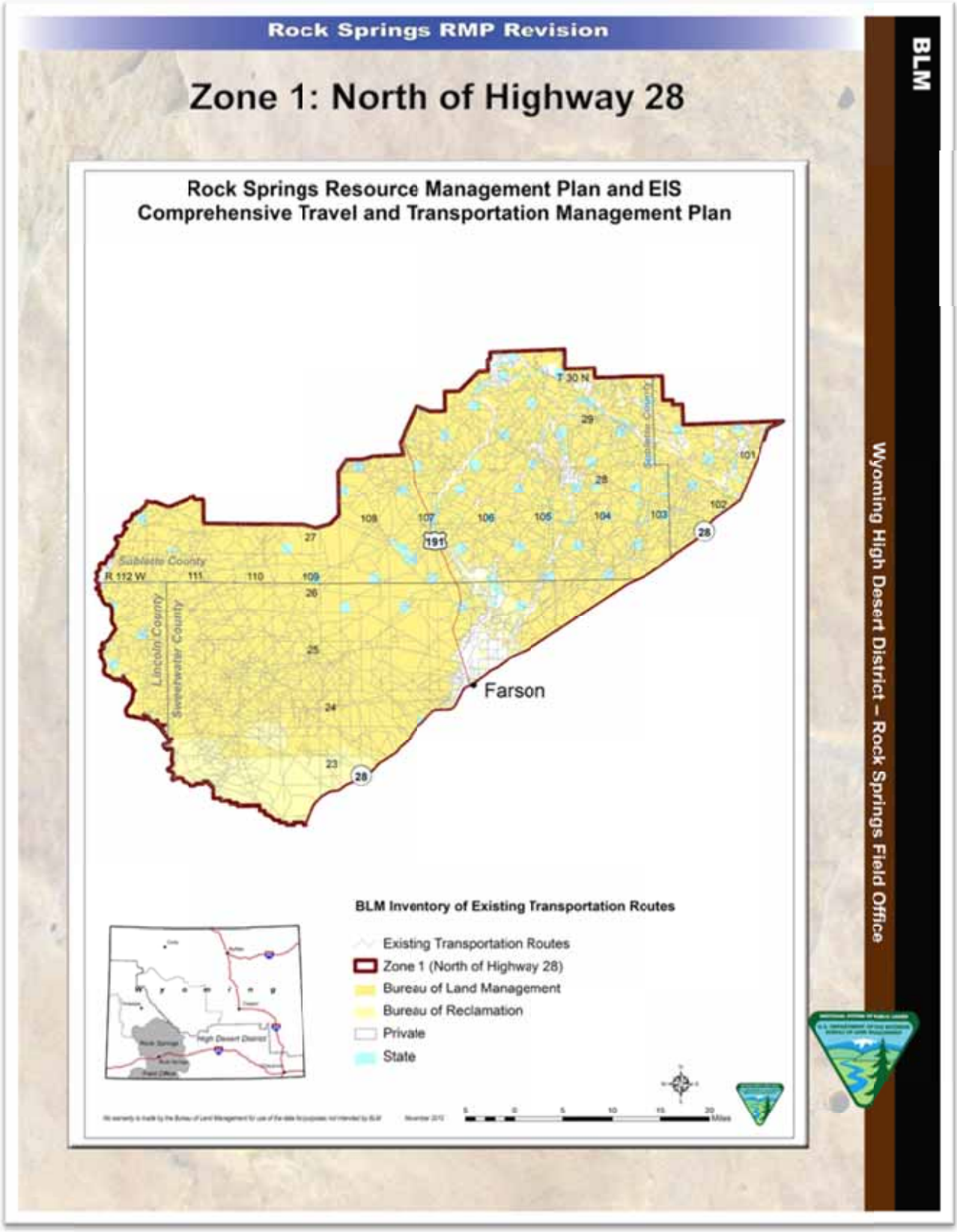
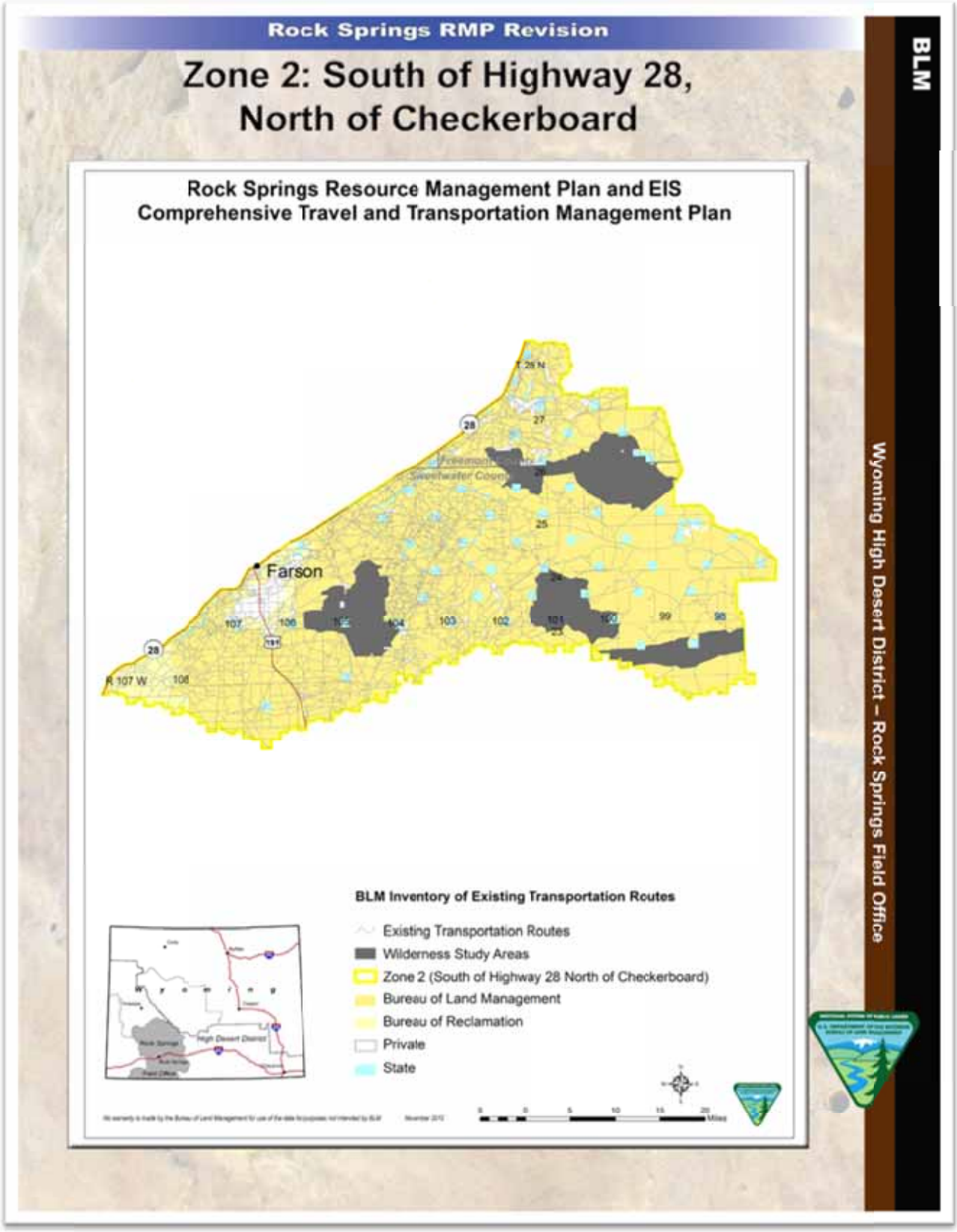
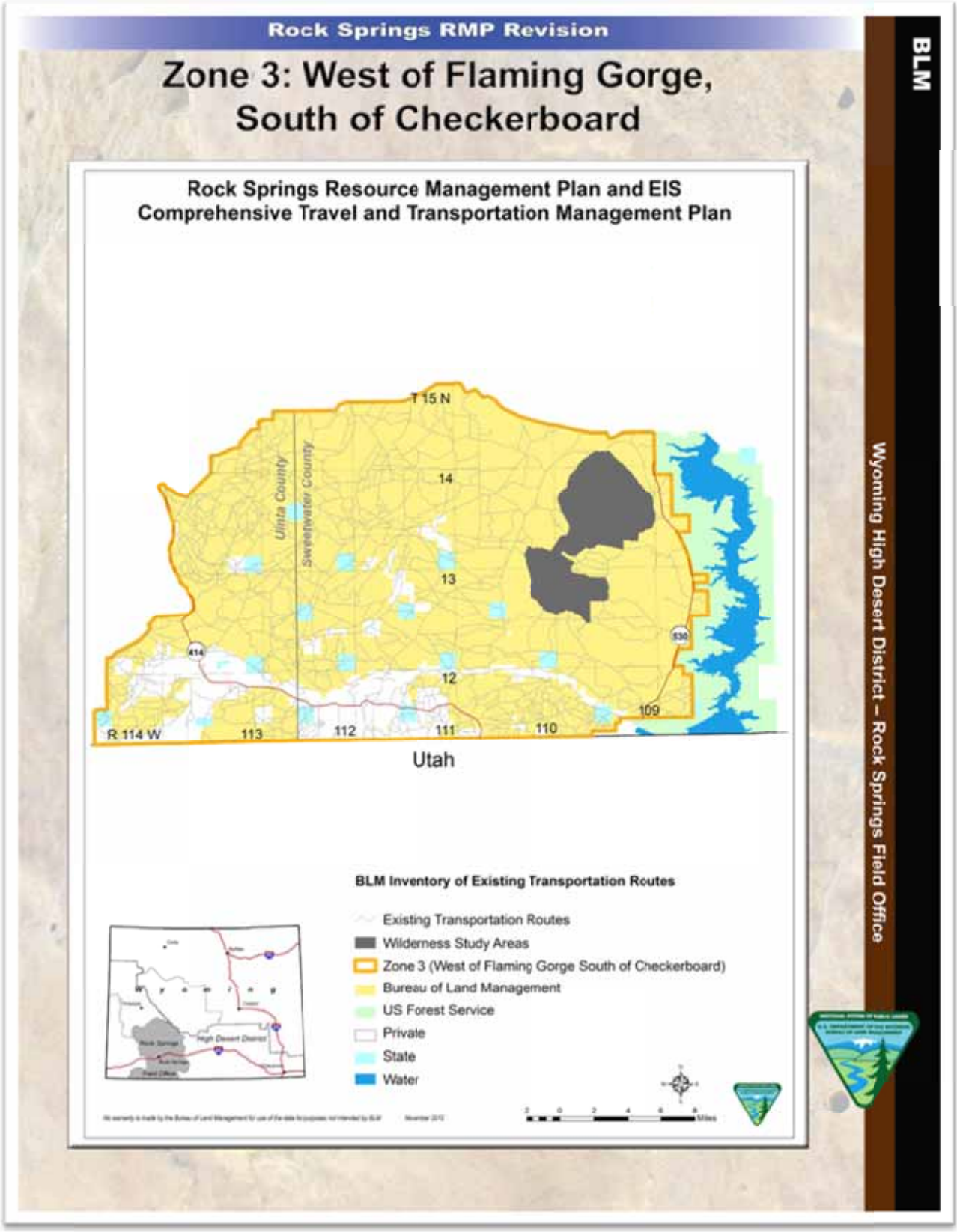
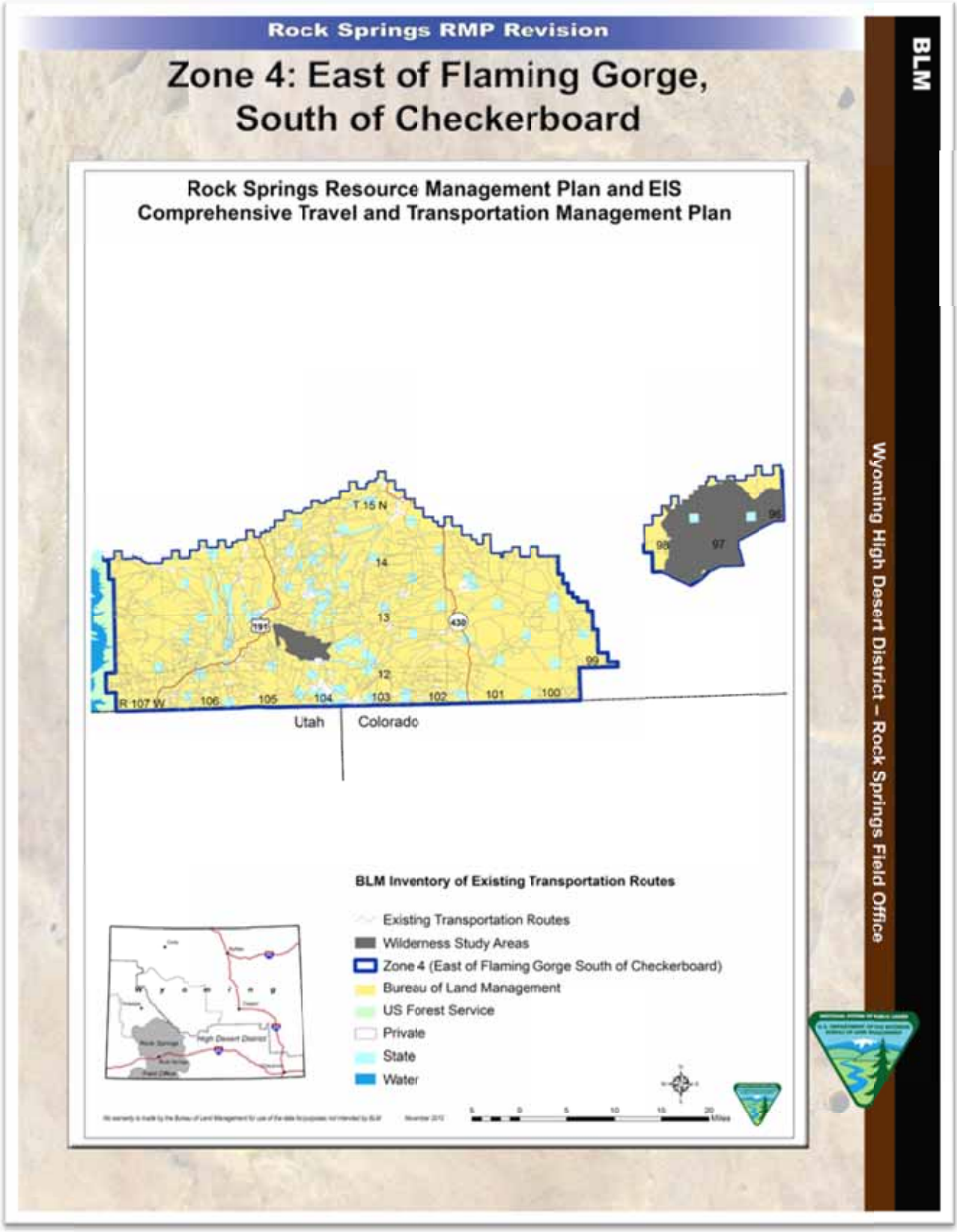

Rock Springs RMP Revision
BLM Inventory of Existing Routes
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
Pinedale Field Office
Lander Field Office
Rawlins Field Office
Kemmerer Field Office
Zone 1 (North of Highway 28)
Zone 2 (South of Highway 28 North of Checkerboard)
Zone 3 (West of Flaming Gorge South of Checkerboard)
Zone 4 (East of Flaming Gorge South of Checkerboard)
Zone 5 (Checkerboard)
Farson
Superior
Rock Springs
Green River
Utah
Colorado
BLM Inventory of ExistingTransportation Routes
Existing Transportation Routes
Wilderness Study Areas
Transportation Management Zones
Zone 1 (North of Highway 28)
Zone 2 (South of Highway 28 North of Checkerboard)
Zone 3 (West of Flaming Gorge South of Checkerboard)
Zone 4 (East of Flaming Gorge South of Checkerboard)
Zone 5 (Checkerboard)
BLM
Wyoming High Desert District – Rock Springs Field Office


Rock Springs RMP Revision
Zone 1: North of Highway 28
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
T 30 N
R 112 W
Sublette County
Lincoln County
Sweetwater County
Farson
191
28
BLM Inventory of Existing Transportation Routes
Existing Transportation Routes
Zone 1 (North of Highway 28)
Bureau of Land Management
Bureau of Reclamation
Private
State
BLM
Wyoming High Desert District – Rock Springs Field Office


Rock Springs RMP Revision
Zone 2: South of Highway 28, North of Checkerboard
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
Farson
BLM Inventory of Existing Transportation Routes
Existing Transportation Routes
Wilderness Study Areas
Zone 2 (South of Highway 28 North of Checkerboard)
Bureau of Land Management
Bureau of Reclamation
Private
State
BLM
Wyoming High Desert District – Rock Springs Field Office


Rock Springs RMP Revision
Zone 3: West of Flaming Gorge, South of Checkerboard
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
T 15 N
Uinta County
Sweetwater County
14
13
12
414
530
109
R 114 W
113
112
111
110
Utah
BLM Inventory of Existing Transportation Routes
Existing Transportation Routes
Wilderness Study Areas
Zone 3 (West of Flaming Gorge South of Checkerboard)
Bureau of Land Management
US Forest Service
Private
State
Water
BLM
Wyoming High Desert District – Rock Springs Field Office


Rock Springs RMP Revision
Zone 4: East of Flaming Gorge, South of Checkerboard
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
T 15 N
14
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12
191
430
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R 107 W
106
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103
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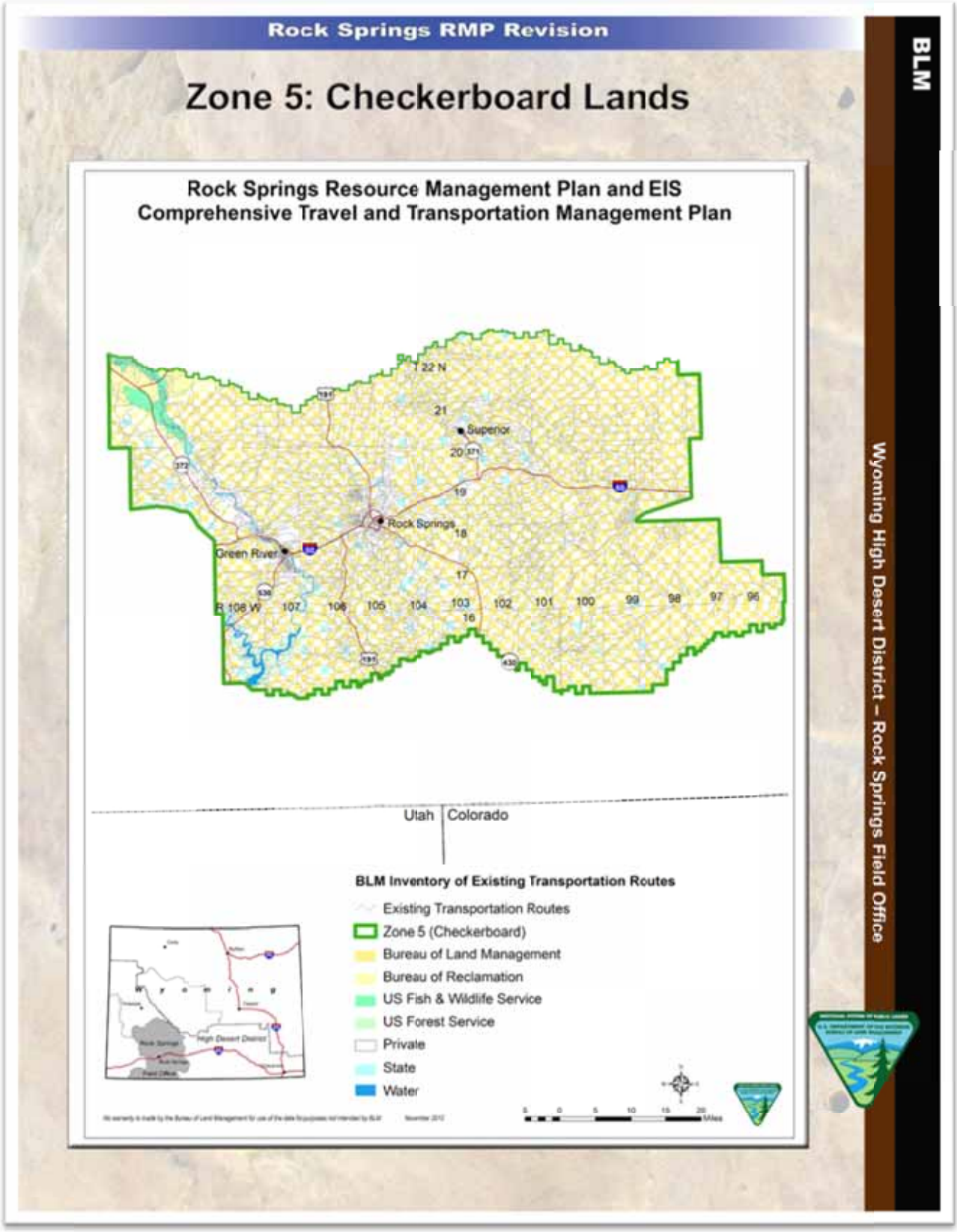
Utah
Colorado
BLM Inventory of Existing Transportation Routes
Existing Transportation Routes
Wilderness Study Areas
Zone 4 (East of Flaming Gorge South of Checkerboard)
Bureau of Land Management
US Forest Service
Private
State
Water
High Desert District
Miles
BLM
Wyoming High Desert District – Rock Springs Field Office


Rock Springs RMP Revision
Zone 5: Checkerboard Lands
Rock Springs Resource Management Plan and EIS
Comprehensive Travel and Transportation Management Plan
T 22 N
21
Superior
20
19
Rock Springs
18
Green River
17
R 108 W
107
106
105
104
103
16
102
101
100
99
98
97
96
Utah
Colorado
BLM Inventory of Existing Transportation Routes
Existing Transportation Routes
Zone 5 (Checkerboard)
Bureau of Land Management
Bureau of Reclamation
US Fish & Wildlife Service
US Forest Service
Private
State
Water
Miles
BLM
Wyoming High Desert District – Rock Springs Field Office