



U.S. Department of the Interior
Bureau of Land Management

Wild Horse Management for the BLM Rock Springs and Rawlins Field Offices

Record of Decision and Approved Resource Management Plan Amendment



2023

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ACRONYMS AND ABBREVIATIONS

%	percent	PHMA	Priority Habitat Management Area
~	approximately	PZP	Porcine Zona Pellucida
AML	Appropriate Management Level	RFO	Rawlins Field Office
AO	Authorized Officer	RMP	Resource Management Plan
AUM	Animal Unit Month	ROD	Record of Decision
BLM	Bureau of Land Management	RSFO	Rock Springs Field Office
BOR	Bureau of Reclamation	RSGA	Rock Springs Grazing Association
CEQ	Council on Environmental Quality	SHPO	State Historic Preservation Office
CFR	Code of Federal Regulation	TCP	Traditional Cultural Property
DOI	Department of the Interior	TES	Threatened and Endangered Species
EIS	Environmental Impact Statement	TNEB	Thriving Natural Ecological Balance
FLPMA	Federal Land Policy and Management Act of 1976	USC	United States Code
FR	Federal Register	USDA	United States Department of Agriculture
GRSG	Greater Sage-Grouse	USFS	United States Forest Service
HMA	Herd Management Area	USFWS	United States Fish and Wildlife Service
HMAP	Herd Management Area Plans	USGS	United States Geological Survey
IDT	Interdisciplinary Team	WDEQ	Wyoming Department of Environmental Quality
IM	Instruction Memorandum	WFRHBA	Wild Free-Roaming Horses and Burros Act of 1971
LUP	Land Use Plan	WGFD	Wyoming Game and Fish Department
MOA	Memorandum of Agreement	WSA	Wilderness Study Area
MOU	Memorandum of Understanding	WYDOT	Wyoming Department of Transportation
NAS	National Academies of Science	WYNDD	Wyoming Natural Diversity Database
NEPA	National Environmental Policy Act		
NHPA	National Historic Preservation Act		
NOA	Notice of Availability		
NOI	Notice of Intent		
NPS	National Park Service		
NRC	National Research Council		
NWR	National Wildlife Refuge		

1.0 Approval

Having considered a full range of alternatives, associated impacts, and public and agency input, I recommend the selection and implementation of the Approved RMP Amendment for Wild Horse Management in the Rocks Springs and Rawlins Field Offices.

Kimberlee Foster, Rock Springs Field Manager

The RMP Amendment for Wild Horse Management in the Rock Springs and Rawlins Field Offices, Wyoming, as described in Section 4.0 Decision, is hereby approved by the Wyoming State Director.

This decision is effective upon the date it is signed by the Authorized Officer (AO).

Approved By:

Andrew S. Archuleta, Wyoming State Director

Approval Date:

2.0 Summary

The Bureau of Land Management (BLM) manages wild horses within designated Herd Management Areas (HMAs). The goal of BLM's wild horse and burro program is to manage healthy wild horses and burros on healthy public rangelands.

In Wyoming, the BLM Rock Springs and Rawlins Field Offices have historically managed wild horses within four HMAs that contain what is commonly referred to as "checkerboard" land. This term refers to a land ownership pattern of alternating sections of federally-owned lands with private or state-owned lands. When viewed on a map that displays land ownership by color, these areas have a similar appearance to a checkerboard. See **Image 1** for a visual example of this type of land ownership pattern.

Image 1. Example of the "checkerboard" land ownership pattern.

BLM	Private	BLM
Private	BLM	Private
BLM	State	BLM

The four HMAs that contain checkerboard land include the Adobe Town, Great Divide Basin, Salt Wells Creek and White Mountain HMAs. When these HMAs were first established, one of the land owners in the checkerboard, the Rock Springs Grazing Association (RSGA), consented to the presence of up to 500 wild horses on the checkerboard portions of these HMAs. However, in 2010 RSGA withdrew its consent, citing concerns that BLM had not been successful in limiting the number of horses on the checkerboard, as per the original agreement. Because private land was included in these HMAs when they were originally established, and because the land ownership pattern in the checkerboard makes it infeasible to manage wild horses without consent from the private land owners, it is necessary for BLM to reevaluate these HMAs to determine if it is still appropriate to manage wild horses in these areas, and if so, to establish a suitable Appropriate Management Level (AML).

3.0 Introduction

The BLM Rock Springs and Rawlins Field Offices are amending their Resource Management Plans (RMPs) for wild horse management on HMAs that contain checkerboard land within the planning area. This action will amend the 1997 Green River RMP (BLM 1997) as well as the 2008 Rawlins RMP (BLM 2008).

This targeted amendment is separate from the ongoing Rock Springs RMP Revision process. The management actions established in this Record of Decision (ROD) will be carried forward as part of the No Action Alternative in the ongoing Rock Springs RMP revision. Because this is a targeted RMP amendment, this document discusses only those management actions associated with wild horse management within the planning area.

The need for this plan amendment is the result of a change in consent for the use of private lands within the checkerboard portion of these HMAs. BLM's wild horse handbook (H-4700-1) requires that BLM acquire written permission from private land owners before including their land in determining adequate habitat for wild horses within an HMA. Additionally, lack of private land owner permission can be a determining factor in not managing all or part of a Herd Area (HA) for wild horses (see H-4700-1 Section 2.1.4).

The RSGA owns a large portion of private land within the checkerboard portion of these HMAs. The RSGA owns 93% of the private land within the checkerboard on the Adobe Town HMA, 50% within the Great Divide Basin HMA, 40% within the Salt Wells Creek HMA, and 82% within the White Mountain HMA. From 1979 to 2010, RSGA consented to the presence of up to a total of 500 wild horses on the checkerboard portion of these HMAs, which includes RSGA's private lands. No other private land owners within these HMAs have consented to allow wild horses to use their land.

In 2010 RSGA revoked its consent, citing concerns that BLM had not been successful in limiting the number of horses on the checkerboard, as per the original agreement. In addition to revoking consent, RSGA asked that wild horses be removed from its private land in these HMAs, as required by Section 4 of the Wild Free-Roaming Horses and Burros Act (WFRHBA). Because private land was included when establishing these HMAs and their associated AMLs, this change in consent for the use of private lands within the checkerboard portion of these HMAs has made it necessary for BLM to reevaluate the HAs on which these HMAs are based to determine if it is still appropriate to manage wild horses in these areas, and to establish a suitable AML.

Management of a wild horse herd in the checkerboard portion of the planning area has become more challenging due to this private land conflict. In the recent *American Wild Horse Preservation Campaign v Jewell*, 847 F.3d 1174 (10th Cir. 2016), the Tenth Circuit Court of Appeals noted the extreme difficulty for BLM to simultaneously meet its public lands herd management obligations under Section 3 and its removal obligations from private lands under Section 4 due to the transient nature of wild horse herds across public and private lands within the checkerboard. This tension arises because, under Section 3 of the WFRHBA, BLM is directed to protect and manage wild horse populations in a manner that promotes a thriving natural ecological balance (TNEB). BLM does not typically reduce wild horse populations below low AML levels except in emergency situations (such as extreme drought). On the other hand, Section 4 of the WFRHBA requires BLM to remove wild horses from private land, when requested to do so. This dual mandate is difficult to implement in the checkerboard where every other section of land is private, and wild horses constantly drift between private and public land. Removing all wild horses that are on private land, or have the potential to stray onto private land, could cause the wild horse population to fall below low AML.

To resolve the issues associated with managing wild horses on checkerboard land without the permissive use of private land, the BLM prepared an Environmental Impact Statement (EIS) to consider alternatives, consistent with *American Wild Horse Preservation Campaign v Jewell*, 847 F.3d 1174, 1189 n.8 (10th Cir. 2016), that include managing for zero wild horses within the checkerboard portions of the HMAs within the planning area by reducing the size of HMAs and reverting checkerboard portions to HAs.

For this RMP Amendment, the planning area includes the land encompassed by the four existing wild horse HMAs that include checkerboard land: Adobe Town, Great Divide Basin, Salt Wells Creek and White Mountain (see Map 1). The planning area totals 2,811,401 acres. Within the Rock Springs Field Office area, an additional HMA, Little Colorado, is located immediately north of the White Mountain HMA. The Little Colorado HMA is not included in the planning area because it does not contain any checkerboard land. This analysis also does not address other HMAs located within the Rawlins Field Office area because they do not contain any checkerboard land.

3.1 History

In January 1979, RSGA entered an agreement with two wild horse advocacy groups, Wild Horses Yes and the International Society for the Protection of Mustangs and Burros. In this agreement, RSGA agreed that it would not object to the presence of up to 500 wild horses on the checkerboard portions of these HMAs. At that time the estimated number of wild horses in the area far exceeded 500. In September 1979, Mountain States Legal Foundation and RSGA filed a lawsuit in the U.S. District Court for Wyoming seeking to compel the BLM to remove all wild horses in excess of 500 from the checkerboard. In March 1981, the Wyoming District Court ordered BLM to remove all excess wild horses from the checkerboard within 2 years (*Mountain States Legal Foundation and Rock Springs Grazing Association v. Andrus*, D. Wyo. No. C79-275K).

The BLM established AML for these HMAs through the Big Sandy Management Framework Plan (BLM 1982) and the Record of Decision and Rangeland Program Summary for the Salt Wells-Pilot Butte Grazing Environmental Impact Statement (BLM 1984). The AML established in these plans corresponded to the numbers RSGA had agreed upon in 1979. The Record of Decision and Green River Resource Management Plan (BLM 1997) carried these AMLs forward with no changes.

By letter to BLM in October 2010, the RSGA revoked its consent to allow wild horses to utilize private land within the checkerboard. RSGA's revocation cited concerns that BLM could not maintain wild horse populations within the limits RSGA had agreed upon when it gave consent for wild horses to utilize its private land in the checkerboard. RSGA also asked that BLM remove wild horses from its private land in the checkerboard, as provided for in Section 4 of the WFRHBA.

In June 2011, RSGA filed a lawsuit in the U.S. District Court for Wyoming (*Rock Springs Grazing Association v. Salazar*, No. 11-CV-00263-NDF). The RSGA contended, in part, that the BLM violated Section 4 of the WFRHBA, 16 U.S.C. 1334, by failing to remove strayed animals from private lands controlled by the RSGA within the checkerboard. The BLM and RSGA negotiated an agreement to settle the lawsuit and, in April 2013, the court approved a Consent Decree and Joint Stipulation for Dismissal (Consent Decree) resolving the case. The Consent Decree provided specific criteria that would require the BLM to gather wild horses from the checkerboard. It also required BLM to initiate a federal register notice to amend the RMP for wild horse management (see Section 3.2 Consent Decree for more information).

In November 2013, the BLM conducted a gather in the Adobe Town and Salt Wells Creek HMAs to remove wild horses on public and private lands within the HMAs to low AML. Once wild horses had been removed to low AML, the BLM concluded gather operations leaving some wild horses still within the checkerboard portions of the HMA.

Following this gather the RSGA notified the BLM that they believed this gather was not conducted in accordance with the Consent Decree, which they felt required that the BLM remove all wild horses from the checkerboard lands. In response to this notice, the BLM conducted a removal in September 2014, removing all wild horses from both private and public lands in the checkerboard. As a result of this 2014 removal, wild horse numbers fell below the minimum AML threshold for several HMAs.

Several organizations subsequently challenged BLM's 2014 removal of wild horses from the checkerboard, arguing that the removal violated the Federal Land Policy and Management Act of 1976 (FLPMA), the National Environmental Policy Act (NEPA), and the WFRHBA (*American Wild Horse Preservation Campaign v. Jewell*, No 14-cv-152-NDF (D. Wyo.)). On March 3, 2015, the U.S. District Court affirmed the BLM actions under the WFRHBA, but remanded the BLM actions under NEPA. The organizations then appealed the District Court decision to the U.S. Court of Appeals for the Tenth Circuit. On October 14, 2016, the Court of Appeals reversed the decision of the District Court and held that BLM had violated both the WFRHBA and FLPMA. While acknowledging that the statutory scheme of WFRHBA makes it practically impossible for BLM to satisfy both Section 3 and Section 4 of WFRHBA in managing wild horses in checkerboard lands, the court ultimately ruled that the BLM could not rely on its statutory mandate to remove strayed animals on private lands under Section 4, to also remove animals from public lands within the checkerboard. The court of appeals also held that the BLM had violated FLPMA by failing to maintain AML within the HMAs. The court of appeals did, however, suggest that it may be possible to avoid the FLPMA and NEPA violations in the future, and eliminate conflict in the checkerboard, if BLM redrew the boundaries of the applicable HMAs or adjusted AMLs as part of an amendment to the applicable RMPs. *American Wild Horse Preservation Campaign v Jewell*, 847 F.3d 1174, 1189–90 n.8 (10th Cir. 2016).

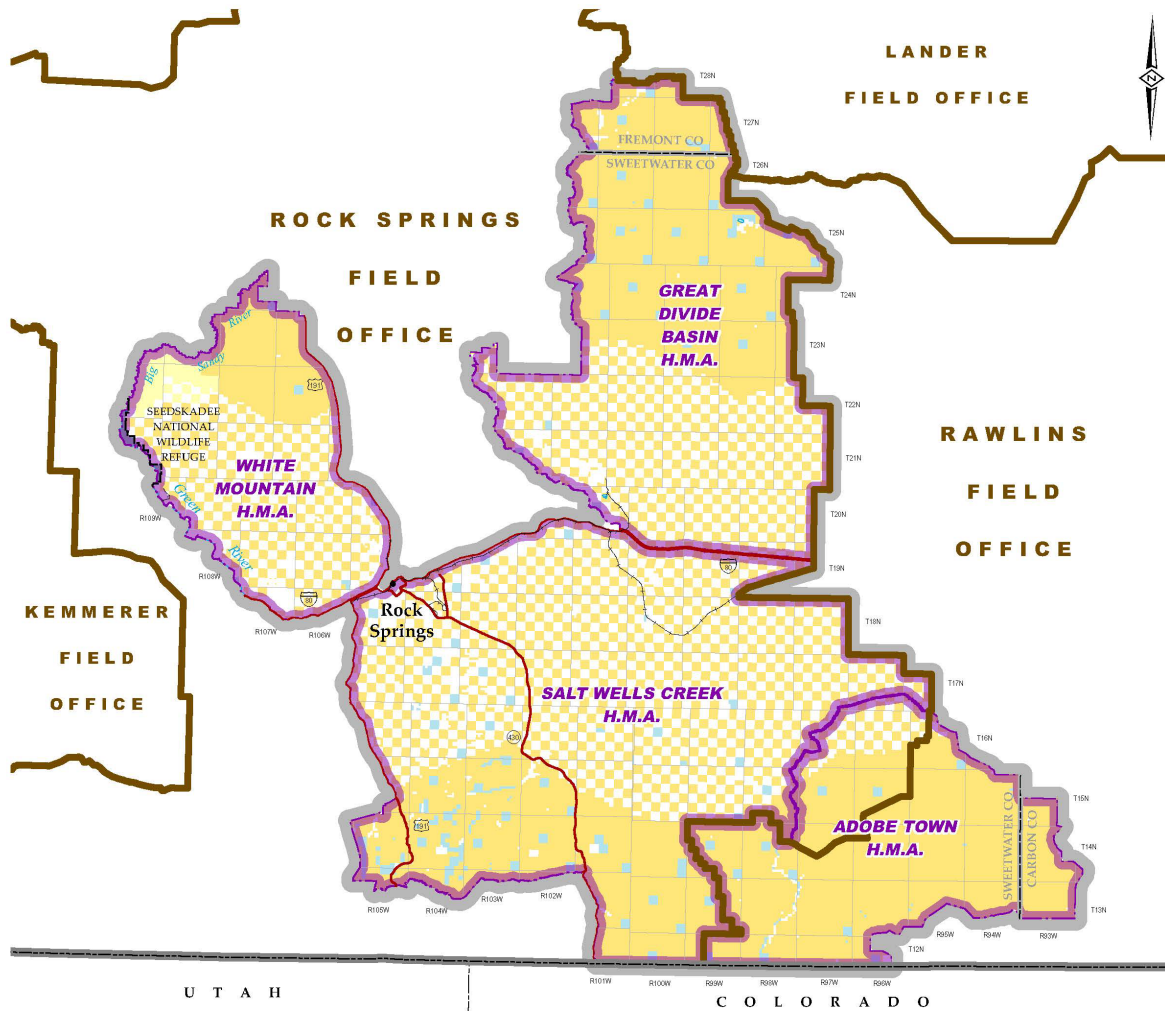
3.2 Consent Decree

The 2013 Consent Decree is a court approved, negotiated agreement between the BLM and the RSGA that discusses how RSGA's concerns with BLM's management of wild horses in the checkerboard will be addressed. The Consent Decree provides, in part, that the BLM will "consider the environmental effects of revising the respective [RMPs] for the Rock Springs and Rawlins Field Offices by considering proposed actions" that would:

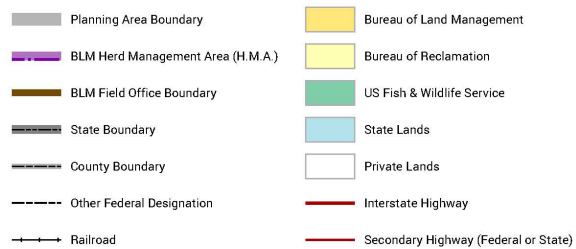
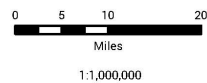
- Change the Salt Wells Creek HMA to a Herd Area, which would be managed for zero wild horses, and if the BLM determines there are more than 200 wild horses within the herd area, the area will be re-gathered to zero wild horses;
- Change the Great Divide Basin HMA to a Herd Area, which would be managed for zero wild horses, and if BLM determines there are more than 100 wild horses within the Herd Area, the area will be re-gathered to zero wild horses;
- Change the Adobe Town HMA appropriate management level (AML) to 225-450 wild horses or lower, and that gathered wild horses will not be returned to the Salt Wells Creek area; and
- Manage the White Mountain HMA as a non-reproducing herd by utilizing fertility control and sterilization methods to maintain a population of 205 wild horses and to initiate gathers if the population exceeds 205 wild horses.

The Consent Decree requires that BLM consider these actions, but does not require that the BLM implement any specific action. The BLM has met the requirements of the Consent Decree by considering each of these actions as elements of various alternatives in the EIS associated with this RMP Amendment.

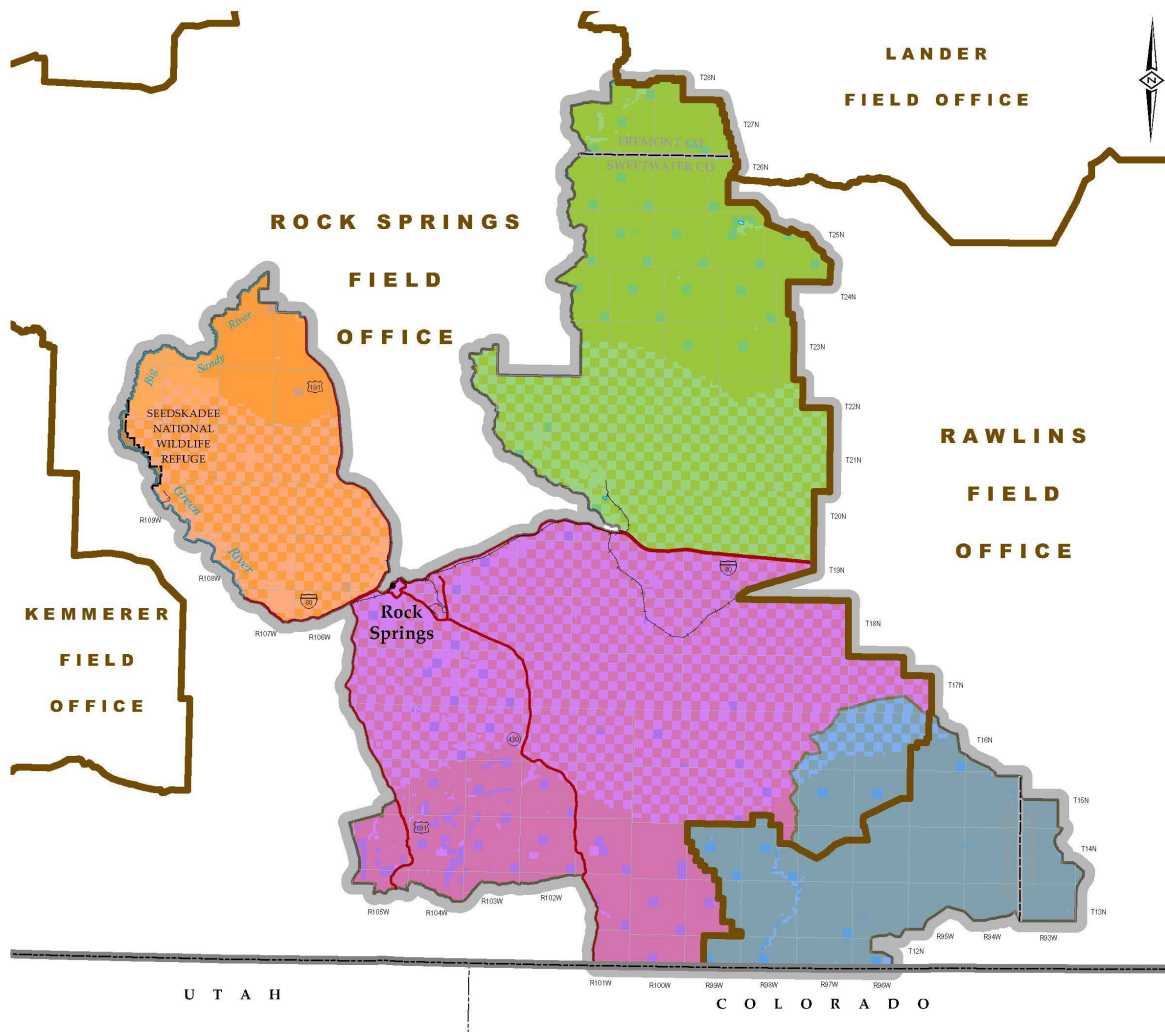
Map 1. Planning Area.



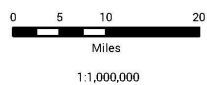
Map 1: Planning Area
Approved Resource Management
Plan Amendment



No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. The User assumes the entire risk associated with its use of these data and bears all responsibility in determining whether these data are fit for the User's intended use.



Map 2: Existing HMAs
Approved Resource Management
Plan Amendment



BLM Wild Horse Herd Management Areas



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4.0 Decision

The BLM has determined that the analysis contained within the Proposed RMP Amendment and Final Environmental Impact Statement for Wild Horse Management in the Rock Springs and Rawlins Field Offices, Wyoming (hereafter called the FEIS), is adequate for the purposes of reaching an informed decision regarding the amendment of these RMPs for management of wild horses within the planning area. This ROD applies only to the BLM-administered public lands within the planning area.

The BLM hereby selects and approves the FEIS Proposed RMP Amendment Alternative (Alternative D) in its entirety, to address private land conflicts in wild horse management on checkerboard lands.

Alternative D was developed based on the planning criteria described in Section 1.4 of the FEIS and refined in response to public comments on the Draft EIS and input from the Cooperating Agencies.

This decision amends the Rock Springs and Rawlins Field Office RMPs as described in this section; the current RMPs will remain unchanged in all other respects:

- The Rock Springs Field Office (RSFO) portion of the Adobe Town HMA will revert to HA status and be managed for zero wild horses. In the Rawlins Field Office (RFO) portion of the HMA, all checkerboard land and the portion of the HMA north of the existing Corson Springs southern allotment boundary fence (see Map 3) will revert to HA status and be managed for zero wild horses. The remaining lands (within the RFO) will be retained as an HMA and managed with an AML of 259 – 536.
- The entire Great Divide Basin HMA will revert to HA status and be managed for zero wild horses.
- The entire Salt Wells Creek HMA will revert to HA status and be managed for zero wild horses.
- The boundary of the White Mountain HMA would remain the same as Alternative A and would include checkerboard land. This HMA would be managed with an AML of 205 – 300. The White Mountain HMA would not be managed as a non-reproducing herd; however, population growth suppression strategies would be implemented to limit population growth rates for this herd.

The AML for the Adobe Town and White Mountain HMAs will be evaluated and adjusted in the future when detailed, site specific data are available (approximately 5 years after successfully implementing these Management Actions). Following that, AML may be adjusted as needed when site specific data demonstrates a change in AML is appropriate. To evaluate and potentially adjust AML, the BLM will conduct and document the multi-tiered analysis process outlined in the Wild Horses and Burros Management Handbook (H-4700-1, Appendix 3). This analysis will include an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use, and climate data. BLM will prepare a site-specific environmental analysis, including opportunity for public comment, before making a decision to change AML within these HMAs. AML would not be evaluated each time a wild horse gather is proposed, but rather when a potential need for adjustment is indicated by monitoring data.

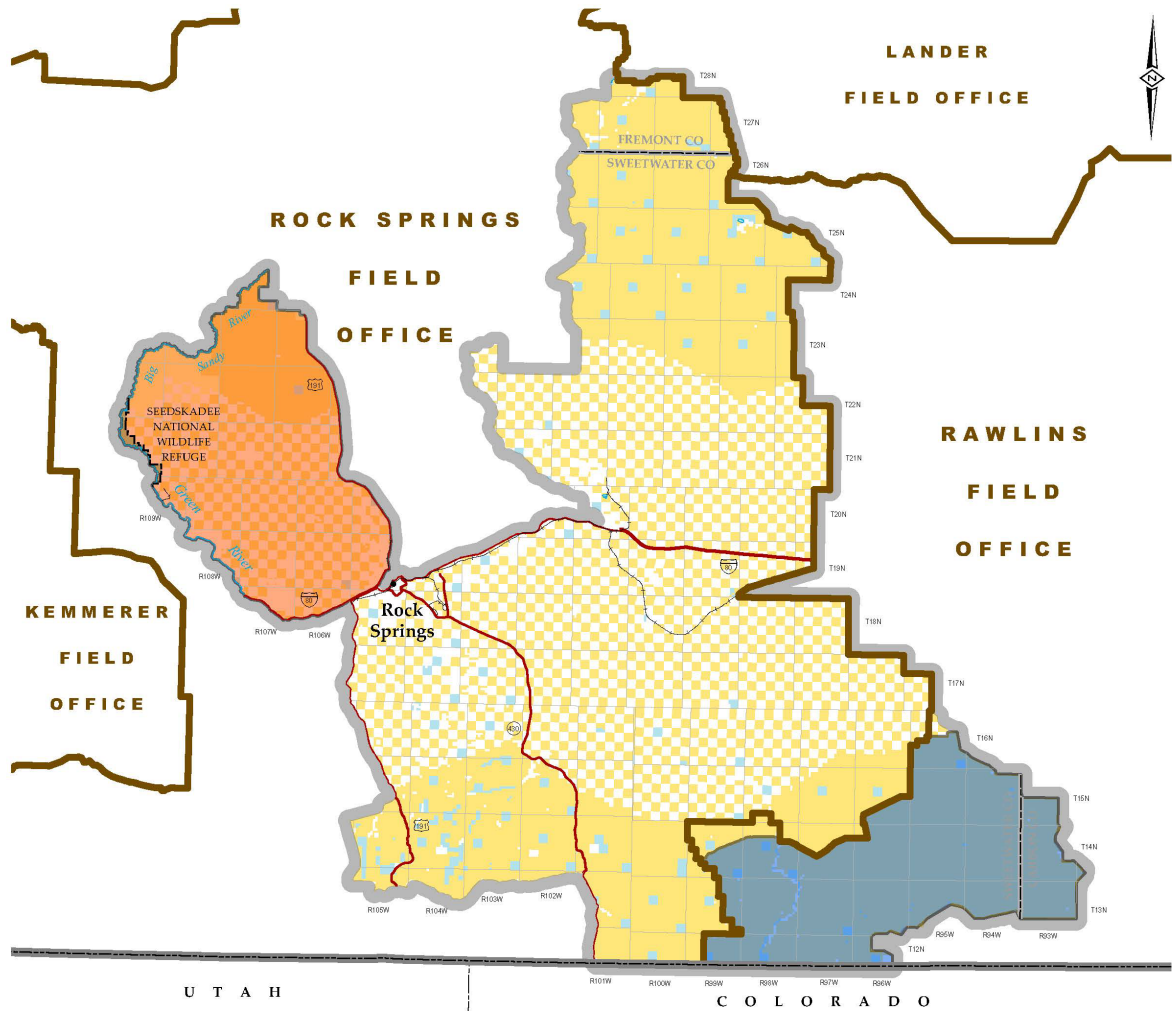
In areas where wild horses are permanently removed, AUMs previously allocated to wild horse use could, in the future, be allocated to wildlife, livestock or other ecosystem functions. The BLM will determine how to allocate these AUMs through future decision-making, based on further NEPA analysis including an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use and climate data.

Population management tools will be used to help manage wild horse populations and reduce the frequency of gathers. Population management tools could include use of immunocontraceptives,

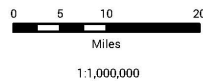
Decision

gelding, spaying, sex ratio skewing or other population growth control methods. Wild horses may be relocated from other HMAs to the remaining HMAs to help maintain genetic diversity, as needed. When relocating wild horses, care would be taken to ensure the health of the horses being introduced to the HMA. Potential animals for relocation would have a good body condition, absence of obvious defects or abnormalities and an absence of diseases. Typical relocation activities would involve introducing approximately 5 mares from an outside HMA into the subject HMA. BLM would ensure this introduction would not cause the wild horse population within the HMA to exceed AML. BLM would decide whether to use specific population management tools after conducting appropriate review in accordance with NEPA.

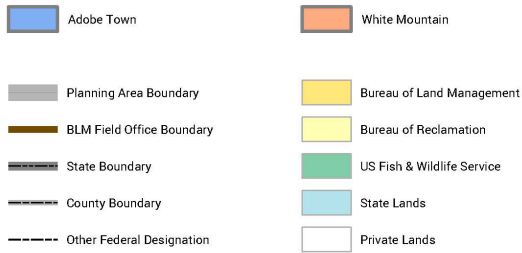
Map 3. Wild Horse HMAs Under this Decision



Map 3: Wild Horse Management
Approved Resource Management
Plan Amendment



BLM Wild Horse Herd Management Areas



No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. The User assumes the entire risk associated with its use of these data and bears all responsibility in determining whether these data are fit for the User's intended use.

4.1 Management Actions

Table 1. Management Actions.

Management Action (MA) #	Goal / Objective	Management Action
	Goals and Objectives: <ul style="list-style-type: none"> • Wild Horse (WH) 1: Manage wild horses in the planning area at Appropriate Management Levels (AMLs) to support a TNEB. • WH 2: Provide adequate habitat for free-roaming wild horses through management consistent with the principles of multiple use. • WH 3: Provide opportunities for the public to view wild horses. • WH 4: Monitor wild horse populations and rangeland conditions to inform wild horse management decisions. 	
MA001	WH 2	Manage wild horses adhering to all applicable laws, agreements, court orders, and decisions for each HMA and consider private property rights.
MA002	WH 1, 4	Specific habitat objectives for HMAs would be established through the development and implementation of HMA plans for each HMA or Complex. Consideration will be given to desired plant communities, wildlife habitat, watershed, livestock grazing, and other resource needs.
MA003	WH 2, 3	Wild horses would be managed within two wild horse HMAs. These are the Adobe Town and White Mountain HMAs (Map 3). Revert the Great Divide Basin and Salt Wells Creek HMAs to HA status and manage them for zero wild horses.
MA004	WH 1, 2	Revert the entire Salt Wells Creek HMA to HA status and manage for zero wild horses.
MA005	WH 1, 2	Retain the White Mountain HMA and manage AML in accordance with MA009.
MA006	WH 1, 2	Revert the entire RSFO portion of the Adobe Town HMA to HA status and manage for zero wild horses.
MA007	WH 1, 2	Revert the checkerboard portion of the Adobe Town HMA within the RFO to HA status and manage for zero wild horses. Revert the portion of the HMA north of the existing Corson Springs southern allotment boundary fence to HA status and manage for zero wild horses. Retain the remainder of this HMA within the RFO and manage AML in accordance with MA009.

Management Action (MA) #	Goal / Objective	Management Action
MA008	WH 1, 2, 3	Revert the entire Great Divide Basin HMA to HA status and manage for zero wild horses.
MA009	WH 1	<p>Maintain an AML of 464 to 836 wild horses on two HMAs. Allocate 10,032 AUMs to wild horses to support high AML.</p> <p>Adobe Town (RFO):</p> <ul style="list-style-type: none"> • Acres: 355,094 (BLM: 345,277) • AML: 259-536 • AUMs: 3,108 -6,432 <p>White Mountain:</p> <ul style="list-style-type: none"> • Acres: 388,488 (BLM: 207,350) • AML: 205-300 • AUMs: 2,460-3,600
MA010	WH 1, 2	AUMs previously allocated to wild horse use, but no longer consumed by wild horses, could be allocated to wildlife, livestock or other ecosystem functions. Determine how to allocate these AUMs after conducting an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use and climate data.
MA011	WH 2	<p>Provide water developments for wild horses where necessary to improve wild horse herd distribution and manage forage utilization.</p> <p>Allow water developments for wild horses on crucial winter ranges if they conform to wildlife objectives and do not result in adverse impacts to the crucial winter range.</p>
MA012	WH 2	<p>Utilize a variety of population growth suppression tools to help manage wild horse populations. These tools could include gelding, spaying, sex ratio skewing or other population growth control methods (mechanical, surgical, or chemical).</p> <p>Implementation of any of these population growth suppression tools would be through a site-specific activity plan.</p> <p>Periodically supplement any herds with potential low genetic diversity with additional wild horses from other HMAs to maintain the genetic diversity of the herd.</p>
MA013	WH 1	Prepare gather plans for removal of excess wild horses from inside and outside the wild horse HMAs.

Decision

Management Action (MA) #	Goal / Objective	Management Action
MA014	WH 2	Allow new fencing in wild horse HMAs on a case-by-case basis that does not impede or endanger wild horse management and supports other resource values.
MA015	WH 3	Provide opportunity for public education and enjoyment of wild horse herds by placing interpretive signs, providing interpretive sites, and providing viewing access to the herd management areas.
MA016	WH 1, 2, 4	AML may be adjusted as needed through separate NEPA analysis when site specific data demonstrates a change in AML is appropriate. To adjust AML the BLM will conduct and document the multi-tiered analysis process outlined in the Wild Horses and Burros Management Handbook (H-4700-1, Appendix 3). This analysis will include an in-depth review of intensive monitoring data.

5.0 Summary of Alternatives

5.1 Overview

Four alternatives were considered in detail in the FEIS, including the Proposed RMP Amendment. For a complete description of the alternatives, refer to Chapter 2 of the FEIS. Five (5) additional alternatives were considered and eliminated from detailed study, as explained in Section 2.4 of the FEIS, *Alternatives Considered but Eliminated from Detailed Analysis*, and summarized in Section 5.3 of this document.

5.2 Alternatives Analyzed

5.2.1 Alternative A – No Action

According to 40 CFR 1502.14(d), the EIS must include the alternative of no action; this is the only alternative that does not need to respond to the BLM's Purpose and Need. Consideration of Alternative A provides a baseline for analyzing impacts (including cumulative impacts) resulting from implementation of the Proposed Action and other action alternatives.

Wild horses in the planning area are currently managed under the Green River RMP (1997) and Rawlins RMP (2008), as amended. The following HMAs are included within the planning area: Adobe Town, Great Divide Basin, Salt Wells Creek and White Mountain. Management under Alternative A (No Action Alternative) represents a continuation of the management of these HMAs under the current RMPs. Under this Alternative, the BLM would manage wild horses within these four HMAs at a total AML of 1,481 to 2,065. Water developments would be provided as necessary. Fencing would only be constructed when multiple-use values would be enhanced, and would be built to minimize restriction of wild horse movement. Fertility control would only be implemented when necessary, and opportunities for public enjoyment of wild horse herds would be provided by the development of interpretive signs, and sites, and access to herd areas. Current management of wild horses within checkerboard lands has presented significant challenges due to private land conflicts. Implementation of Alternative A would require resolution of these private land conflicts.

5.2.2 Alternative B

Under Alternative B, AML for the White Mountain HMA would be reduced to 99 – 205. AML for the Adobe Town HMA would be reduced to 225 – 450. Under this alternative, all checkerboard lands within the Adobe Town, Great Divide Basin and Salt Wells Creek HMAs would revert to HA status and be managed for zero wild horses. The White Mountain HMA would continue to include checkerboard land. A total AML of 990 to 1,620 wild horses would be maintained among the four HMAs. Livestock grazing permits would be reduced within the Great Divide Basin and Salt Wells Creek HMAs by a total of 6,876 Animal Unit Months (AUMs) to accommodate wild horses (1,620 at high AML) being concentrated in smaller HMAs. Section 4.2.10 of the FEIS provides a breakdown of the reduction in livestock AUMs within each HMA under this alternative. All wild horse herds would be managed as non-reproducing, using various population growth suppression methods, including, but not limited to: gelding, spaying, or other mechanical, surgical, or chemical means. This would reduce the number of gathers required to maintain AML.

Under this alternative, AML may be adjusted as needed when site specific data demonstrates a change in AML is appropriate. To evaluate and potentially adjust AML, the BLM would conduct and document

the multi-tiered analysis process outlined in the Wild Horses and Burros Management Handbook (H-4700-1, Appendix 3). This analysis would include an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use, and climate data. A site specific environmental analysis will be prepared, including opportunities for public comment. AML would not be evaluated each time a wild horse gather is proposed, but the AML may be evaluated if monitoring data demonstrates there is a substantial increase or decrease in available forage, or long term conditions within the HMA have changed as a result of prolonged drought, wildfires, noxious weed infestations, or changes in livestock management.

AUMs previously allocated to wild horse use on checkerboard lands and no longer consumed by wild horses could, in the future, be allocated to wildlife, livestock or other ecosystem functions. The BLM will determine how to allocate these AUMs through future decision-making, based on further NEPA analysis including an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use and climate data. This alternative responds, in part, to requirements of the Consent Decree (i.e. analysis of an alternative that manages the White Mountain HMA as a non-reproducing herd with a high AML of 205 or less, and managing the Adobe Town HMA at an AML of 225 – 450).

5.2.3 Alternative C

Under Alternative C all wild horses would be removed from the planning area, and the HMAs would revert to HA status and be managed for zero wild horses. This alternative responds, in part, to requirements of the Consent Decree (i.e. analysis of reverting the Salt Wells Creek and Great Divide Basin HMAs to HAs and managing them for zero wild horses).

AUMs previously allocated to wild horse use could, in the future, be allocated to wildlife, livestock or other ecosystem functions. The BLM will determine how to allocate these AUMs through future decision-making, based on further NEPA analysis including an in-depth review of intensive monitoring data including: grazing utilization, use patterns, Standards for Healthy Rangelands, trend monitoring, actual use and climate data.

5.2.4 Alternative D – Proposed RMP Amendment

For this ROD, Alternative D was selected in its entirety. See Section 3.0 for a full description of this alternative.

5.3 Alternatives Considered, but Eliminated from Detailed Analysis

The following alternatives were considered but eliminated from detailed analysis for wild horse management.

Maintain Public Land Portions of HMAs within the Checkerboard

Under this alternative the BLM would remove the private land portions of the checkerboard, and adjust the AML accordingly, but would maintain the public land portions of the HMAs. When wild horses moved onto private lands, the BLM would remove them as requested by the landowner. This alternative was eliminated from detailed analysis, because it is not technically feasible. In the checkerboard landownership pattern, where ownership alternates every other square mile, and very little fencing limits wild horse movement, wild horses constantly move on and off of private land. It would not be feasible to ensure that wild horses remain on only the BLM managed sections in this area.

While courts have held that the BLM is not required to prevent wild horses from straying onto private lands (*Fallini v. Hodel*, 783 F.2d 1343 (9th Cir. 1986)), it would not be reasonable to maintain an HMA in a location where the constant straying of wild horses onto private land is expected, the owner of the private lands does not consent to wild horse presence on private land, and the owner of the private lands is expected to exercise its right to demand BLM remove wild horses from private lands pursuant to Section 4 of the WFRHBA. If BLM attempted to manage a wild horse herd on the public land portions of the checkerboard, the BLM would be overwhelmed by its mandatory removal obligations under Section 4 of the WFRHBA. In *American Wild Horse Preservation Campaign v. Jewell*, 847 F.3d 1174 (10th Cir. 2016), the Tenth Circuit Court of Appeals noted the tension between Sections 3 and 4 of the WFRHBA, and the extreme difficulty for BLM in simultaneously meeting its obligations under both statutory provisions in the checkerboard. For these reasons, the BLM has determined that this alternative is not technically feasible, and has eliminated it from detailed analysis in this document.

Maintain Only Wild Horses in the Solid Block and Only Livestock in the Checkerboard

Under this alternative, the BLM would remove all permitted livestock AUMs from the solid block portion of the planning area, and wild horse AMLs would be increased in those areas. Additionally, all wild horses would be removed from the checkerboard portion of the planning area. This alternative is substantially similar to Alternative B with respect to wild horse management, in that it would remove wild horses from checkerboard and increase their numbers on solid block lands, while proportionately reducing permitted livestock use on solid block lands in two HMAs. Management actions associated with livestock grazing under this alternative differs in degree from Alternative B, in that it would go beyond a reduction in livestock AUMs, and eliminate all permitted livestock use on solid block land to allow for a higher wild horse AML. However, Alternative B already includes a method whereby BLM may adjust AML and livestock AUMs upward or downward in the future after collecting and reviewing multiple years of monitoring data and completing further NEPA analysis.

Manage the Solid-block portion of the White Mountain HMA in Conjunction with the Little Colorado HMA

Under this alternative, the BLM would retain the solid-block portion of the White Mountain HMA and manage it in conjunction with the Little Colorado HMA. This alternative was eliminated from detailed analysis, because it is not technically feasible. Wild horses within this HMA have historically moved back and forth between the checkerboard and solid-block portions of the HMA. In order to prevent wild horses from straying onto private land within the checkerboard, a fence, or some other type of barrier, would need to be constructed on the southern border. However, there is no existing fence or other natural barrier that would connect with such a barrier on the western side. Therefore, this alternative was determined to be infeasible.

Conduct a Land Exchange

Under this alternative, the BLM and private land owners would conduct a land exchange to extend the “solid block” portion of public land and remove the issues associated with the checkerboard land ownership pattern. BLM does not currently have a proposal from a willing party (or group of parties) to a land exchange involving checkerboard lands in the planning area. Even if a proposal existed, a land exchange would entail extensive surveys of millions of acres for mineral value, cultural resources, and potential hazardous materials, which would likely take years to complete and demand extensive agency resources. This alternative therefore would not respond to the purpose and need for the plan amendment, which is intended to resolve private land conflicts in the near term. Also, this alternative would involve multiple private land owners agreeing on the details of a land exchange with BLM. Together, these factors make this alternative infeasible for consideration in this plan amendment

Summary of Alternatives

process. This plan amendment would not foreclose the possibility of consideration of a land exchange in the future, if a viable proposal is presented. If an exchange were completed, BLM would amend its land use plan to include newly acquired lands, and could consider changes in management for wild horses at that time.

Balanced Herbivore Reduction Alternative

Under this alternative, reductions in AUMs would be shared equally between wild horses and permitted livestock. This alternative would not meet the purpose and need of the plan amendment to address wild horse management on HMAs that include checkerboard land, where the BLM no longer has permissive use of that land for wild horse management. Alternative B is similar to this alternative, in that it proposes to reduce permitted livestock use to make additional forage available for wild horses on the solid block portions of these HMAs, but better responds to the purpose and need for the plan amendment because it would address the management challenges in the checkerboard portions of the HMAs in the absence of private landowner consent.

Native Predator Alternative

Under this alternative, wolves or other natural predators would be introduced to the area as a means of attempting to control wild horse populations in these HMAs. This alternative would not meet the purpose and need of the plan amendment to address the management challenges in the checkerboard portions of the HMAs in the absence of private landowner consent.

6.0 Management Considerations and Rationale for Decision

The BLM prepared the FEIS to consider alternatives for wild horse management on HMAs that contain checkerboard land. Based on the results of the analysis in the FEIS, the Authorized Officer has determined that this RMP Amendment represents the best option to meet the purpose and need, and address wild horse management issues in HMAs where the BLM no longer has the permissive use of private land for wild horses.

The sections below outline additional considerations that contributed to the BLM's approval of this RMP Amendment.

6.1 Purpose and Need for the Project

The purpose of this planning effort is to identify and select, consistent with applicable law, a plan for wild horse management, including AML, on the current HMAs that include checkerboard land, in the Rock Springs Field Office and a portion of the Rawlins Field Office. The need for the plan amendment is driven by the checkerboard pattern of public and private land ownership within the HMAs, the requirements of the WFRHBA, and RSGA's withdrawal of consent to maintain wild horses on privately-owned lands (2013 Consent Decree, 43 C.F.R. § 4710.1, and BLM Handbook H-4700-1 Section 2.1.4).

6.2 Analysis in the FEIS

The FEIS includes a range of alternatives that were developed based on the terms of the 2013 Consent Decree, issues identified during scoping, public comments on the Draft EIS, and input from cooperating agencies and other stakeholders during alternatives development and throughout the EIS process. The FEIS thoroughly describes and analyzes potential impacts to resources that could result from the alternatives considered, thereby disclosing to the public these potential impacts and providing the decision-maker an informed understanding of potential impacts and sufficient information on which to base a decision.

6.3 Rationale

General Rationale

The decision selects the Proposed RMP Amendment analyzed in the FEIS. This alternative best addresses the Purpose and Need for the plan amendment, is technically capable of implementation, and accomplishes a balance of multiple-use values by maintaining a wild horse herd in a portion of the planning area. Additionally, this represents the environmentally preferable alternative, because it provides the greatest overall benefit to resource values.

This decision will resolve conflicts between BLM's management of wild horses and private land owners in the checkerboard that have been ongoing since the late 1970's. RSGA's withdrawal of its consent for wild horses to use its private land in the checkerboard in 2010 followed over 30 years of conflict regarding the management of the checkerboard portion of these HMAs (see Section 1.1 of the FEIS for a detailed history regarding this conflict). While RSGA is the primary private land owner that has challenged BLM's management of wild horses in the checkerboard, no other private land owners have consented to the presence of wild horses on their land within these HMAs.

This decision will permanently remove wild horses from the entire Great Divide Basin and Salt Wells Creek HMAs, while maintaining wild horses within the White Mountain and Adobe Town HMAs. The

boundary for the Adobe Town HMA will be adjusted in a way that excludes all checkerboard land and better aligns with natural, and man-made, barriers. This boundary adjustment will greatly reduce the possibility of wild horses straying back onto private land on the checkerboard from these HMAs. While the BLM is not required to prevent wild horses from straying onto private lands (*Fallini v. Hodel*, 783 F.2d 1343 (9th Cir. 1986)), it would be challenging to maintain several HMAs where the straying of wild horses onto private land is expected, the owner of the private lands may not consent to wild horse presence on private land, and the owner of the private lands may regularly exercise its right to demand BLM remove wild horses from private lands pursuant to Section 4 of the WFRHBA.

Rationale for the RMP Amendment by HMA

Adobe Town HMA

In this RMP Amendment the RSFO portion of the Adobe Town HMA will revert to HA status and be managed for zero wild horses. Currently, 42% of the RSFO portion of this HMA lies within the checkerboard land ownership pattern. The BLM considered the possibility of allowing continuation of wild horse use on the RSFO portion of the HMA outside of the checkerboard, but determined that a combination of topography, land ownership, and available resources made this unfeasible because wild horses would constantly stray onto private land within the checkerboard.

Under this decision the HMA boundary will be adjusted to more closely align with existing natural and man-made boundaries. There are no other natural or man-made boundaries in the area that would prevent wild horses from drifting onto checkerboard lands, so this action of aligning the revised HMA boundary with the existing infrastructure would assist in keeping wild horses off private lands in the checkerboard. Because it includes this boundary adjustment to prevent wild horses from straying onto the private land in the checkerboard, the decision will allow the BLM to manage more wild horses in this area than the number considered in Alternative B of the EIS.

The RFO portion of the HMA will be reduced in area, so that it only encompasses solid block lands, and excludes checkerboard and lands north of the existing Corson Springs southern allotment boundary fence. The AML for the remaining RFO portion of the Adobe Town HMA will be 259 – 536 wild horses. This AML was calculated by adjusting the historic AML of 610 – 800 in proportion to the reduced area of the HMA, taking into consideration climate, vegetation trend, livestock use, range suitability, wild horse genetics and populations, wildlife habitat and population objectives, carrying capacity, watershed values, disturbance and reclamation, recreation use, and dietary comparison for livestock, wildlife, and wild horses. The BLM reviewed AML (as per H-4700-1) and found that there will be adequate forage, water, cover and space to sustain a wild horse herd, and maintain a TNEB within the reduced HMA area, at this AML. The combined forage needs of livestock and wild horses within the new HMA boundary would be lower, compared to historic management. Furthermore, all grazing allotments within this portion of the HMA are currently meeting all land health standards. Since these allotments were able to meet these standards at historic livestock and wild horse numbers, it is expected that the lower overall forage needs under this RMP Amendment would continue to support rangeland health standards in this area. Based on these factors, and in particular the carrying capacity of the area (as represented by AUMs), the BLM determined that a reduced AML of 259 – 536 wild horses will be appropriate for the RFO portion of the Adobe Town HMA, and will ensure a TNEB.

Great Divide Basin HMA

In this RMP Amendment, the entire Great Divide Basin HMA will revert to HA status and be managed for zero wild horses. Currently 48% of this HMA lies within the checkerboard pattern of land ownership, but

the solid-block portion will also revert to HA status because BLM has no reasonable possibility of creating an effective barrier between checkerboard and solid-block federal lands to prevent wild horses from returning to the checkerboard. The BLM conducted a review of AML (as per H-4700-1, Appendix 3) and found that there was adequate forage, water, cover and space to sustain a wild horse herd in the solid-block portion of this HMA; however, to prevent wild horses who had historically utilized the checkerboard lands from drifting out of the solid-block portion of this HMA, a fence or another type of barrier would be required along the entire southern border, between solid block and checkerboard lands. Currently there are no other fences or natural topography that this southern barrier could intersect on the western side for at least 30 miles. A southern barrier would also fully bisect the Sublette Mule Deer Migration Corridor, and would potentially interfere with big game migration. Therefore, even though the analysis in Appendix A of the EIS demonstrated that there is adequate forage, water cover and space to support a wild horse herd in the solid-block portion of the area, it would be very difficult for BLM to prevent this herd from continually returning to private lands in the checkerboard. And even if BLM could erect a fence, doing so would adversely affect big game migration corridors. For this reason, the entire Great Divide Basin HMA will revert to HA status and be managed for zero wild horses.

Salt Wells Creek HMA

In this RMP Amendment, the entire Salt Wells Creek HMA will revert to HA status and be managed for zero wild horses. Currently 72% of this HMA lies within the checkerboard pattern of ownership, but the solid-block portion will also revert to HA status because it is not feasible for BLM to create an effective barrier between checkerboard and solid-block federal lands. The BLM conducted a review of AML (as per H-4700-1) and found that there would be adequate forage, water cover and space to sustain a wild horse herd and maintain a TNEB within the solid-block portion of the HMA. However, to prevent wild horses who had historically utilized the checkerboard lands, from drifting out of the solid-block portion of this HMA a fence or another type of barrier would be required along the entire northern border, between solid block and checkerboard lands. Currently there are no other fences or natural topography that this northern barrier could intersect on the eastern side for at least 30 miles. Good tie-in points are lacking on the western side as well. Therefore, even though there is adequate forage, water cover and space to support a wild horse herd in the solid-block portion of this area, it would be very difficult for BLM to prevent this herd from continually returning to private lands in the checkerboard. Additionally, construction of a fence or another type of barrier on the northern border of this HMA would negatively impact Greater Sage-grouse by creating a collision hazard near active leks. For these reasons, the Salt Wells Creek HMA will revert to HA status and be managed for zero wild horses.

White Mountain HMA

In this RMP Amendment, the boundary of the White Mountain HMA would remain the same as current management and would continue to include checkerboard land. The AML for this HMA would remain the same, at 205 – 300 wild horses. The White Mountain herd would not be managed as a non-reproducing herd; however, the BLM would implement population growth suppression strategies to reduce the population growth rate for this herd.

The White Mountain HMA currently contains a Wild Horse Scenic Loop Byway. This portion of the HMA is a popular setting for locals, and tourists, to view wild horses near the cities of Green River and Rock Springs. The State of Wyoming, local governmental organizations and numerous individuals expressed concerns that the removal of all wild horses from this HMA would negatively affect local communities, and the portion of their economy that receives a benefit from tourism related to wild horse viewing (see Section 4.2.12 of the FEIS).

Through the analysis in the EIS, the BLM determined that it would not likely be feasible to maintain a fully non-reproducing herd in the White Mountain HMA. However, by utilizing population growth suppression strategies on this herd, this RMP Amendment would reduce wild horse population growth rates thereby reducing the frequency of gathers needed to maintain wild horses within AML. This will make it more feasible to manage wild horses within the established AML range. This is expected to address concerns from the private landowner regarding the potential future overpopulation of wild horses in this area.

Rationale for Why other Alternatives Analyzed in the EIS Were Not Selected

Alternative A (No Action) would not meet the purpose and need for the plan amendment. Specifically, it would not address the conflict with private lands in the checkerboard. Furthermore, it is not feasible to maintain a herd in the checkerboard, without private landowner consent.

Analysis of Alternative B showed that this alternative would likely have undesirable impacts on other resource values, in particular big game species and sage-grouse. Effective implementation of this alternative would have required construction of over 100 miles of fences or other barriers between the solid block public land areas and the checkerboard. Such barriers would impede big game migration, including portions of the Sublette Mule Deer Migration Corridor. These barriers would also create a potential collision hazard for Greater Sage-grouse. In addition, the analysis showed that it would be very difficult for BLM to successfully maintain these herds as non-reproducing.

Alternative C would have removed all wild horses from the planning area. This did not represent the best balance of multiple resource values, where other options were available.

7.0 Consultation, Cooperation, and Public Involvement

In accordance with NEPA, FLPMA, Council on Environmental Quality (CEQ) and DOI regulations implementing NEPA, DOI and BLM regulations implementing FLPMA, and DOI and BLM policies and procedures, BLM involved the interested public, federal, state, tribal, and local agencies, and potentially affected parties throughout its decision-making process. The BLM promoted public and cooperating agency involvement, tribal consultation, and consultation with other agencies and entities through public meetings, informal meetings, individual contacts, news releases, newsletters, workshops, a planning website, social media posts, and the *Federal Register*.

7.1 Cooperating Agencies

The BLM prepares NEPA analyses and documentation “in cooperation with state and local governments” and other agencies with jurisdiction by law or special expertise (42 U.S.C. § 4331(a), 4332[2]), referred to as cooperating agencies. The BLM invited federal, state, and local government agencies, and potentially affected tribes to participate in the EIS process as cooperating agencies.

Cooperating agencies provided input during initial preparation of the EIS and throughout the process related to issues for which they have jurisdictional authority or special expertise. They reviewed draft information, participated in alternatives development, gave overall advice on the process, and met with BLM periodically to discuss EIS issues as a group. Twenty nine (29) organizations participated as cooperating agencies for this RMP Amendment process:

- City of Rock Springs
- Coalition of Local Governments
- Eastern Shoshone Tribe of the Wind River Reservation
- Fremont County
- The Governor’s Office
- Lincoln County
- Lincoln County Conservation District
- Northern Arapaho Tribe
- Shoshone-Bannock Tribes of the Fort Hall Reservation
- Sublette County
- Sublette County Conservation District
- Sweetwater County
- Sweetwater County Conservation District
- Uinta County
- Uinta County Conservation District
- The Ute Tribe of the Uintah and Ouray Reservation
- U.S. Bureau of Reclamation
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service
- U.S. Forest Service
- U.S. Department of Agriculture: Animal and Plant Health Inspection Service

- U.S. National Park Service
- Wyoming County Commissioners Association
- Wyoming Department of Agriculture
- Wyoming Department of Environmental Quality
- Wyoming Game and Fish Department
- Wyoming Geological Survey
- Wyoming Office of State Lands and Investments
- Wyoming State Historic Preservation Office.

7.2 National Historic Preservation Act Section 106 Consultation

Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, requires federal agencies to consider the effects of their actions on historic properties, following regulations issued by the Advisory Council on Historic Preservation (ACHP) codified at 36 Code of Federal Regulations 800. The BLM consulted with the Wyoming State Historic Preservation Office (SHPO) and the ACHP in accordance with Section 106. The BLM conducted a Class I Cultural Inventory for the planning area in 2013. Tribal consultation under Section 106 of NHPA was initiated in tandem with the EIS process, described further below in Section 7.3.

7.3 Tribal Government-to-Government Consultation

Prior to the scoping period, the BLM initiated government-to-government consultation with potentially affected and interested tribes as part of the EIS process. Letters were sent to five tribes inviting them to participate in project review and consultation under NHPA and NEPA. The tribal consultation letter provided information about revising/amending the RMPs and requested tribes submit questions, concerns, or comments to the BLM. In addition to consultation activities, the BLM invited the tribes to be cooperating agencies and to attend cooperating agency meetings, alternatives development workshops, and field trips. The BLM mailed consultation letters to the following tribes:

- Eastern Shoshone Tribe
- Fort Peck Assiniboiné and Sioux Tribes
- Northern Arapaho Tribe
- Shoshone-Bannock Tribe
- Ute Tribe of the Uintah and Ouray Reservation

In follow up to the tribal consultation letters, BLM cultural resource specialists phoned tribes to offer to set up meetings to discuss the project. Consultation with tribes that have an interest in this RMP amendment has continued through regular communication about the RMP Amendment process.

7.4 Protests and Comments from Governor's Consistency Review

The BLM published the FEIS associated with this Plan Amendment on May 6, 2022, and accepted protests to the Proposed RMP Amendment during the following 30-day period. The BLM received 26 protest letters from various individuals and organizations. After careful review of the protest points, the BLM Director confirmed that BLM WY had followed all applicable laws, regulations, and policies and

considered all relevant sources of information and public input in preparing the FEIS, and that no changes to the Proposed RMP Amendment were necessary.

The BLM prepared and published a Director's Summary Protest Resolution Report on December 15, 2022, which is available online at:

<https://www.blm.gov/wyoming/directors-protest-resolutions/protest-resolution-report/wild-horse-management-blm-rock>

Publication of the FEIS initiated a 60-day Governor's Consistency Review period. The Governor did not identify any state or local plans that conflicted with the Proposed RMP Amendment.

7.5 Public Involvement

The BLM initiated public scoping for the Rock Springs RMP Revision on February 1, 2011 with the publication of a Notice of Intent (NOI) in the *Federal Register*. Results of scoping for the RMP revision are available in the Rock Springs RMP Revision Scoping Report, available on the Rock Springs RMP ePlanning webpage. Issues identified for wild horse management during this scoping period focused on how the BLM would manage wild horse populations.

On August 16, 2013, the BLM published in the *Federal Register* a notice to extend the public scoping period for the Rock Springs RMP revision and to amend the 2008 Rawlins RMP to address management of wild horses and burros on checkerboard lands in the respective field offices. BLM allowed the public an additional 30 days to submit scoping comments on wild horse management. The results of that scoping effort are documented in the Wild Horse and Burro Consent Decree Scoping Report Addendum, available on the Rock Springs RMP ePlanning webpage. During the public scoping period, 15,013 individuals, agencies, and groups submitted comments on wild horse management. 734 substantive comments were identified; the bulk of commenters submitted identical form letters. Many of the comments expressed concern about wild horse reductions, over-population, conflict with other uses, the manner and method of gathers, and the viability of herds at Consent Decree AMLs. The BLM held two scoping meetings in September 2013 in Rock Springs and Rawlins, Wyoming.

In early 2019, as a result of delays in the RMP Revision effort unrelated to wild horse management, the BLM initiated a separate RMP Amendment to address the pressing wild horse management issues on the checkerboard HMAs. The 2013 scoping notice had specifically included management of wild horses on checkerboard lands. Therefore, the public input about wild horse management that was received during that scoping effort was considered in the preparation of this RMP Amendment.

On January 31, 2020, the BLM published a Notice of Availability (NOA) in the *Federal Register* announcing the availability of the Draft EIS for the RMP Amendment to address wild horse management on the checkerboard HMAs. The NOA initiated a 30-day public comment period. The BLM held public meetings in Rock Springs and Rawlins on March 5 and 11, 2020, respectively. The BLM received individual comments from 3,201 individuals and organizations. From these, the BLM identified 288 substantive comments.

See Section 7.4 for information regarding publication of the FEIS, consideration of protests, and Governor's Consistency Review.

8.0 References

- Bureau of Land Management (BLM) 1982. Management Framework Plan for the Big Sandy Resource Area. BLM Rock Springs District, Wyoming.
- BLM 1984. Record of Decision and Rangeland Program Summary for the Salt Wells – Pilot Butte Grazing Environmental Impact Statement. US Department of Interior, Bureau of Land Management Rock Springs District. February 1984.
- BLM 1997a. Record of Decision and Green River Resource Management Plan. BLM/WY/PL-97-027+1610. BLM Wyoming State Office, Rock Springs District Office, October 1997.
- BLM. 2008. Record of Decision and Rawlins Resource Management Plan. BLM/WY/PL-08/007+1610. BLM Wyoming State Office, High Desert District Office, December 2008.