

Mary Jo Rugwell, State Director
Attn.: Greater Sage-Grouse EIS
BLM Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009

July 18, 2018

Wyoming Greater Sage Grouse RMPA-EIS

Submission Successful

Your Submission ID is: WY-GRSG-1-216532

Dear Ms. Rugwell,

The 2018 proposed Greater Sage Grouse RMPA would reduce protections for National Trail corridors, which would likely lead to actions that substantially interfere with protecting National Trail values. As such, the No Action alternative should be selected for those Sagebrush Focal Areas that are found within potential National Trail Management Corridors.

The recently established Sage Grouse Sagebrush Focal Areas not only protect Sage Grouse, but in some locations, the areas also protect National Scenic and Historic Trail cultural landscapes. This is especially true where the BLM has failed to provide for National Trail protections in a Resource Management Plan (e.g., Rock Springs RMP). A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values."

The 2015 BLM Wyoming EIS states that, "[n]ew policy addressing the management of NHTs was issued by the BLM in 2012. The BLM will manage National Scenic and Historic Trail resources, qualities, values, and associated settings, and the primary use or uses in accordance with the direction provided in BLM Manual 6280. This policy will be adhered to during any site-specific project NEPA analyses that are conducted in the planning area" (FEIS at 4-241). In addition to site-specific planning, MS-6280 direction requires that RMPs establish programmatic direction to protect National Trail Management Corridors—BLM MS-6280, Chapter 4, Congressionally Designated Trails - Land Use Planning.

I have attached a PDF map of a section of the Rock Springs Field Office. The depicted Rock Springs National Trail Management Corridor extent is based on the scene area along National Trail travel routes and is compatible with the designated National Trail Management Corridor that is identified in the revised Lander RMP. The Rock Springs office RMP initiated revision many years ago and has failed to recognize National Trail Management Corridor planning needs

in the revision effort. Maintaining the Sagebrush Focal Area designations within this Field Office unit may be the best avenue at this time to protect National Trail cultural landscapes.

The California, Pony Express, Oregon, and Mormon Pioneer National Historic Trail Comprehensive Plan describes that, “The emigrants’ trail experience focused neither on a set of ruts nor on many isolated places along the way, but instead on the physical nature of the regions they traversed. Today, we define such areas as landscapes. A cultural landscape is defined as a geographic area, including both natural and cultural resources, and the wildlife and domestic animals associated with an historic event, activity, or person or exhibiting other cultural or aesthetic values. The term landscape has tremendous variations in status, meaning, and usage. Ecologists often use the term ecoregion or ecosystem when they refer to landscapes. Among cultural geographers its definition has changed dramatically during the last half century and it continues to evolve. The cultural aspects of a landscape are as important as the natural features in defining management alternatives for different trail resources. Although landscapes have not been considered essential trail resources, they should be a high priority for managers because they define the nature of the trail, both at the time of the original use and at the present. Landscapes are a very important trail resource, and they need as much attention and protection as ruts and swales. Legally they merit the same treatment and protection as other cultural resources.” (Comprehensive Plan at 99).

Furthermore, the Federal Land Policy and Management Act of 1976, as amended (P.L. 94-579), section 102, states, “regulations and plans for the protection of public land areas of critical environmental concern be promptly developed.” In addition, Section 103 describes, “(a) The term “areas of critical environmental concern” means areas within the public lands where special management attention is required...to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.”

“In the development and revision of land use plans, the Secretary shall– (3) give priority to the designation and protection of areas of critical environmental concern; ...and (9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located...” (FLPMA Section 202)

“The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act 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.” (FLPMA Section 302)

Sagebrush Focal Areas and National Trail Management Corridors are clearly areas where “special management attention is required” as specified in the FLPMA definition of an ACEC. The recognition of GRSG components and National Trail corridors as ACECs as defined in FLMPA provides an appropriate mechanism for the identification of these areas and the protection of their values through the development, amending, and implementation of Resource Management Plans.

Summarizing, (1) the Draft RMP amendment fails to conserve important Sage Grouse habitat and protect the cultural landscapes along National Scenic and Historic Trails and (2) the DEIS fails to address National Trails in the affected environment and environmental consequences of the document. I recommend that the No Action alternative be selected and believe that No Action must be selected for Sagebrush Focal Areas that are found within potential National Trail Management Corridors.

Thank you for considering these comments.

Greg Warren

Attachment – SFA and NTMCs within the Rock Springs FO