

Kimberlee Foster, Field Manager  
Bureau of Land Management  
Rock Springs Field Office  
280 Highway 191 North  
Rock Springs, WY 82901-3447

Re: Need to Postpone Release of the Rock Springs RMP Until Public Meetings can be Held  
March 31, 2020

Dear Kimberlee Foster:

We applaud the steps that the Department of the Interior has already taken to limit the spread of COVID-19 in light of the states of emergency declared by President Donald Trump and Wyoming Governor Mark Gordon, including Secretary Bernhardt's direction to Interior employees to work remotely, the Interior Board of Land Appeals' extension of filing deadlines, and the BLM's decision to suspend Resource Advisory Council meetings. As the pandemic continues to spread and its scope becomes apparent through increased testing, it is crucial that our federal agencies take every possible precaution to limit the chances of exposure.

In this respect, we ask the BLM to wait to release the Rock Springs Resource Management Plan until such time as the risk of spread has abated and the public can safely reconvene. Given the uncertainty surrounding the virus, a premature release of the draft RMP could preclude the BLM from safely and legally holding public meetings on the RMP during the comment period. It would be a violation of the National Environmental Policy Act, current guidelines set by the Council on Environmental Quality, and the BLM Manual for BLM to make a final decision on this RMP without adequate public engagement which must include opportunities for the public to hear from BLM officials, engage with the material, and ask questions. Resource Management Plans set management directions and policy goals for decades, and local stakeholder input is essential throughout the process.

Due to the size of the planning area, its wealth of resources, and its importance to stakeholders, it is essential that BLM postpone the decision-making process until such time that public meetings can be held. It is clear from the outreach already conducted and the number of public comments received on prior plans for the field office that this specific RMP is of the utmost importance to a broad range of Wyoming people. The public interest in this landscape indicates that the RMP's revision will result in significant environmental controversy. CEQ regulations provide: "Agencies shall...[h]old or sponsor public hearings or public meetings whenever appropriate[.] Criteria shall include whether there is...substantial environmental controversy concerning the proposed action or substantial interest in holding the hearing." 40 C.F.R. § 1506.6(c)(1).

The BLM's Rock Springs Field Office, which spans some 3.6 million acres of public lands including the Red Desert, manages some of Wyoming's most treasured public resources including Greater Little Mountain, the Steamboat Mountain desert elk herd, the Red Desert to Hoback mule deer migration corridor, extraordinary Greater sage-grouse habitat in the Golden

Triangle, Historic South Pass, the Killpecker Sand Dunes, numerous tribal cultural properties and sacred sites, and the Oregon and Mormon National Historic Trails. These resources contribute to Wyoming's economy and outdoor heritage and are highly valued by a diversity of stakeholders.

During the public comment period for the BLM's 2006 Jack Morrow Hills Coordinated Activity Plan, Wyoming residents submitted more than 69,000 comments, more than on any previous Wyoming BLM action. More than 97 percent of public comments supported maintaining the existing multiple use management of the landscape. On information and belief, we expect significant changes to the field office's current management in the upcoming draft RMP. Yet, the public has not had an opportunity to weigh in on the Rock Springs RMP revision since scoping was conducted in 2011. It is critical that the BLM hold meetings so that the public can be informed and weigh in on the management of this landscape for the first time in almost a decade. The BLM should postpone the release of the RMP until public meetings can safely and legally resume.

BLM's internal guidance requires meaningful opportunities for public participation and coordination with an interested public during planning processes. Accordingly, BLM must provide for public meetings or hearings. A RMP process without meaningful and genuine opportunities for public engagement and participation would fall well short of the BLM's own requirements. The BLM Manual instructs: "The land use planning process is the key tool used by the BLM, *in coordination with interested publics*, to protect resources and designate uses on Federal lands[.]" § 1601.01 (emphasis added). Additionally, the Manual requires BLM to "[e]nsure opportunities for participation by...the public." § 1601.02(C). Planning documents can be dense and confusing. Public meetings give the public the opportunity to ask questions, clarify technical language, and provide local input. Many in our state have limited access or no access to high-speed internet, and libraries are currently shut down, limiting access further. In-person review of relevant documents may be difficult or impossible.

We urge the BLM to postpone the release of the draft RMP until public meetings can be safely and legally held to allow for a full 90-day period once the government has resumed business as usual. Please let us know if you have any questions, include us on the list of interested parties, and include this letter in the official record.

Sincerely,

John Rader  
Conservation Advocate  
Wyoming Outdoor Council

Dan Smitherman  
Wyoming Manager  
The Wilderness Society

Rob Joyce  
Conservation Organizer  
Sierra Club Wyoming Chapter

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CC:

Wyoming Governor Mark Gordon

Duane Spencer, Acting State Director, BLM Wyoming