

## BOARD OF COUNTY COMMISSIONERS

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October 3, 2023

The Honorable Tracy Stone-Manning  
Director, Bureau of Land Management  
1849 C Street, NW  
Room 5646  
Washington, DC 20240

Dear Director Stone-Manning,

On September 27, 2023, the Sweetwater County Board of County Commissioners received correspondence from Governor Mark Gordon requesting the Bureau of Land Management (BLM) to consider withdrawing the Rock Springs Draft Rock Springs Resource Management Plan (RMP) and reconsider another alternative utilizing the substantial comments from stakeholders and the public throughout the development of the Rock Springs RMP. The Sweetwater County Board of County Commissioners join in support of Governor Gordon's request for the BLM to withdraw the Draft Rock Springs RMP and also request withdrawal of the Draft Rock Springs RMP.

Part of a cooperator's role is to ensure that the RMP followed all required processes and inform the BLM of defects so as to give the process a genuine opportunity to have been corrected rather than simply pushed through. Sweetwater County provides the following additional concerns:

- The agency preferred alternative chosen does not reflect the thousands of staff hours spent by Sweetwater County in the collaborative process with the BLM. Sweetwater County worked tireless hours on an alternative that would balance resource conservation and resource development that also took in to consideration the custom and culture of the residents of Sweetwater County. Clearly the selection of Alternative "B" is a complete disregard of the cooperator process and does not align with the purpose of the Federal Lands Policy and Management Act (FLPMA), which is to manage lands by "multiple use".
- The notification process for the Areas of Environmental Concern (ACEC) was not in compliance with 43 CFR 1610.7-2(b) which states "the State Director, upon approval of a draft resource management plan, plan revision, or plan amendment involving ACEC's, shall publish a notice in the Federal Register listing each ACEC proposed and specifying the **resource use limitations**". The notice published identifies the proposed areas but fails to include the "**resource use limitations**" so the ACEC process was not followed to notify the public of potential limitations in these areas. (See Attachment Federal Registrar/Vol. 88, No 159/ Friday August 18, 2023)
- Other required processes for establishing ACEC's provided by the BLM manual were not followed. Examples include:

The failure to provide a list of all areas considered for ACEC designation and a documented analysis of all areas considered for ACEC designation which were determined not to meet the relevance and importance criteria, *inter alia*.

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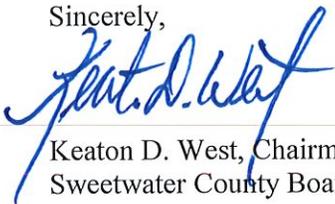


- Alternative “B” will be devastating to the socioeconomics of Sweetwater County. Sixty-seven (67) percent of land ownership in Sweetwater County is BLM, so a public lands management decision that constrains development of multiple sectors, including renewable energy and recreation, will decimate the local economy. The Draft RMP emphasizes the devastation to our economy in 4.22.5, by stating that reduced rates of development under Alternative B could reduce the ability of the community and residents to achieve desired levels of community development and individual economic well-being. Sweetwater County objects to a decision on our public lands that will affect the economic prosperity of our community.

In addition to not following the legal processes for cooperator participation, notice, consideration of cooperator plans, establishment of ACEC’s provided by the BLM manual, *inter alia*, the process of reviewing the plan revealed several inconsistencies throughout the plan. These errors were perhaps in part due to the long delays and sudden revisiting of the plan. Sweetwater County is sincere in its cooperator status and provides this correspondence in an effort to work together with the BLM. As such, Sweetwater County points out the procedural failures for the benefit of both the BLM and the public in an effort to rectify the failures to reestablish good faith in the cooperator and public process. Sweetwater County, along with the Governor asks the BLM withdraw the Draft RMP and move forward with comments provided by local stakeholders to create an alternative that will stand up to legal scrutiny and in support of “multiple uses”. Sweetwater County looks forward to your response by the deadline of October 17, 2023.

Recognizing the errors that exist, it makes more sense to accept the procedural errors and fix them versus dealing with them during the Governor’s Consistency Review and the Cooperator’s Protest and Appeal Processes, which simply cannot replace the lack of participation that resulted from the errors that were made.

Sincerely,



Keaton D. West, Chairman  
Sweetwater County Board of County Commissioners

Cc:

Governor Mark Gordon  
Congresswoman Harriett Hageman  
Senator Cynthia Lummis  
Senator John Barrasso