



***Bureau of Land Management  
Director's Summary Protest Resolution  
Report***

**Final Environmental Impact  
Statement (FEIS) for the  
Proposed Dairy Syncline Mine  
and Reclamation Plan**

February 20, 2020

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## *Acronyms*

<b>ACEC</b>	Area of Critical Environmental Concern
<b>ARMP</b>	Approved Resource Management Plan
<b>BLM</b>	Bureau of Land Management
<b>CEQ</b>	Council on Environmental Quality
<b>CFR</b>	Code of Federal Regulations
<b>CTNF</b>	Caribou-Targhee National Forest
<b>DEIS</b>	Draft Environmental Impact Statement
<b>DROD</b>	Draft Record of Decision
<b>EIS</b>	environmental impact statement
<b>FEIS</b>	Final Environmental Impact Statement
<b>FLPMA</b>	Federal Land Policy and Management Act
<b>GHMA</b>	General Habitat Management Area
<b>IDEQ</b>	Idaho Department of Environmental Quality
<b>IDL</b>	Idaho Department of Lands
<b>NEPA</b>	National Environmental Policy Act
<b>RFP</b>	Revised Forest Plan
<b>RMP</b>	Resource Management Plan
<b>ROD</b>	Record of Decision
<b>U.S.C.</b>	United States Code
<b>USFS</b>	United States Forest Service

### *Protesting Party Index*

<b>Protester</b>	<b>Organization</b>	<b>Determination</b>
Jason L. Christensen and John Carter	Yellowstone to Uintas Connection and Kiesha's Preserve	Denied
Christopher Krupp	WildEarth Guardians	Denied

## NEPA - ACEC

### *Yellowstone to Uintas Connection and Kiesha's Preserve*

*Jason L. Christensen and John Carter*

**Issue Excerpt Text:** As the FEIS (ES-3) notes, the Simplot donation parcel would potentially be added to an existing Area of Critical Environmental Concern (ACEC). Later, on page ES-4, the FEIS states that the ARMP amendment would add the donation parcel to the ACEC. Then on page ES-7 the FEIS waffles again by saying the donated parcel “would likely” be added to the ACEC. In FEIS Chapter 1, BLM decisions to be made are outlined. Here, it is stated, “Manage the BLM donation parcel like an Area of Critical Environmental Concern (ACEC) or approve an ARMP amendment to add the BLM donation parcel to the adjacent Stump Creek Ridge ACEC.” [Emphasis added]. There are more waffling statements in the FEIS, but this illustrates the uncertainty of the donated parcel becoming part of the Stump Creek ACEC.

#### **Summary:**

The Final Environmental Impact Statement (FEIS) for the Proposed Dairy Syncline Mine and Reclamation Plan (BLM 2019) does not clearly state whether or not the donation parcel would be added to the Stump Creek ACEC.

#### **Response:**

As noted in Section 1.3.2, *Bureau of Land Management Decisions to be Made*, the BLM had the choice to either “Manage the BLM donation parcel like an Area of Critical Environmental Concern (ACEC) or approve an ARMP [Approved Resource Management Plan] amendment to add the BLM donation parcel to the adjacent Stump Creek Ridge ACEC” (p. 1-15) in the alternatives where the land donation was included (Proposed Action, Alternatives 1, 3, 4, 5, and 6, and Preferred Alternative).

In the DEIS, the BLM provided a range of alternatives to consider different methods by which the donation parcel could be managed. The FEIS states that the BLM donation parcel would likely be incorporated into the Stump Creek ACEC if Alternative 3 (part of the Preferred Alternative) was chosen (see FEIS p. 4-138). The Pocatello RMP states that acquired lands will be managed in a manner consistent with adjacent public lands (see ARMP Action LR-5.1.1). The BLM could determine in the upcoming ROD that the donation parcel meets at least one Relevance Criterion and at least one Importance Criterion, as outlined in BLM Manual 1613 (see p. 2-15); therefore, it may be eligible to be added to the existing ACEC. However, the BLM can also issue its ROD to reflect the Preferred Alternative, i.e., that the donated parcel would not be incorporated into the Stump Creek ACEC. The BLM will make a final determination in the ROD and provide its rationale. The analysis for all ACEC decisions is documented in the land-use/special designation, wildlife, recreation, and other relevant sections of Chapter Four of the FEIS.

The BLM accurately described the potential for the donation parcel do be added to the Stump Creek ACEC in the FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan. The BLM, in the Record of Decision will clarify the final land management designation for any acquired lands and the rationale for the decision of whether to designate these lands as part of the Stump Creek ACEC.

## ***FLPMA –Section 203(a) Criteria for Disposal***

### ***Yellowstone to Uintas Connection and Kiesha’s Preserve***

***Jason L. Christensen and John Carter***

**Issue Excerpt Text:** One additional concern regarding the analysis of the impacts of the proposed public land sale and the various land sale alternatives: the donation of a parcel of private land cannot be considered in evaluating the impacts of the proposed land sale or exchange, or in determining whether the proposal serves the public interest. Rather, the donation, if it is truly a donation, must be a separate proposed transaction so that it does not impact the evaluation of the Dairy Syncline proposal.

### ***WildEarth Guardians***

***Christopher Krupp***

**Issue Excerpt Text:** The Project’s Final Environmental Impact Statement (FEIS) and Draft Record of Decision (Draft ROD) fail to make a case that the identified public lands meet any of the three criteria. Briefly, there is no evidence that the identified public lands are currently difficult or uneconomic to manage and, given the lands’ location, it seems the lands could suitably be managed by the Forest Service. Similarly, there is no evidence the identified public lands were ever acquired, much less acquired to a specific purpose and no longer required for that purpose.

### ***WildEarth Guardians***

***Christopher Krupp***

**Issue Excerpt Text:** The Bureau does not state why managing a tailings pond is not in the public interest. It may well be that the Bureau is better able to provide oversight of the tailings pond than the State of Idaho, as federal law and regulations are more protective than corresponding Idaho laws and regulations. The FEIS fails to evaluate this issue, however. While BLM many not want to incur potential liability of the pond, BLM neglects to provide a rationale for why that would be in the public’s interest. In sum, to support a decision to identify the public lands for disposal, BLM must explain why the public is better served by the tailings pond being sited on Simplot land rather than public lands.

### ***WildEarth Guardians***

***Christopher Krupp***

**Issue Excerpt Text:** The proposed disposal of the identified public lands would not further the priority emphasis for Zone 3. The proposed disposal would not consolidate ownership. Nor would it, by itself, provide additional public access. The FEIS and Draft ROD do not state that the identified public lands have low resource values or that they are difficult to manage. As with the Bureau’s determination that the identified public lands sale meets FLPMA Section 203(a)’s criteria for disposal.

### **Summary:**

The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan inadequately analyzed the lands for disposal and donation. The lands for sale do not meet the Federal Land Policy and Management Act (FLPMA) Section 203(a) criteria for disposal.

### **Response:**

FLPMA provides certain criteria under which a tract of public land may be sold (see 43 United States Code [U.S.C.] §1713(a)). In this case the BLM determined that disposal of the parcel in question, which is the proposed location of the tailings pond facility, will serve “important public objectives, including but not limited to, expansion of communities and economic development, which cannot be

achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tract in Federal ownership” (43 U.S.C. §1713(a)(3)). The BLM’s sale would meet both the criteria for a land sale under the BLM ARMP and the FLPMA 203(a)(3) criteria (see FEIS p. 4-136). Specifically, the disposal of the parcels would serve important public objectives including economic development and improved administrative management efficiency. The disposal parcels are in Zone 3; however, the ARMP did not identify these lands as specifically meeting FLPMA 203 criteria for a land sale. The required amendment to the ARMP corrects this and specifically identifies these lands as meeting the FLPMA 203 criteria.

Environmental impacts would be the same, regardless of land ownership. The Idaho Department of Environmental Quality (IDEQ) develops the requirements for addressing groundwater degradation and complying with the Idaho Groundwater Rule in regard to how far contaminants of potential concern would be allowed to migrate. In addition, as stated in Section 2.3.7.5 of the FEIS, regardless of land ownership, the Idaho Department of Water Resources would regulate the dam through its Dam Safety Program and under the Preferred Alternative the Idaho Department of Lands would have management responsibilities for ensuring that the tailings pond facility is properly reclaimed. Therefore, the design measures implemented, and the projected groundwater characteristics would remain the same regardless of land ownership.

The FEIS provided an appropriate level of analysis for tailings pond impacts. The sale meets the criteria for a land sale under the 2012 Pocatello ARMP and the FLPMA 203(a)(3) criteria (disposal of the parcel will serve important public objectives including economic development). The direct sale transfers environmental liability of the tailings facility from the public to the private landowner, Simplot (Section 2.3.7.5 and Appendix 6A of the FEIS). Access to public lands will not be diminished. The acquired parcel will allow for recreational use and compensate the public for the land that will otherwise be encumbered with the tailings facility and thus unavailable for recreational use for at a minimum the duration of mining and reclamation (Sections 4.10.1.1 and 4.10.1.4 of the FEIS). The land sale will also consolidate land ownership for Simplot, which will facilitate efficient operation of the tailings facility (Appendix 6) and reduce Federal involvement and associated land management cost. The acquisition of the donation parcel is a connected action. The public will receive the full appraised value for the parcel (see FEIS Sections 2.3.7.5, 2.5.2.2, and 4.15.1.1). In addition to the appraised value, the public will also receive 440 acres of land containing sage-grouse habitat (see FEIS Sections 2.3.7.5, 3.5.2.1, and 4.5.1.1) and elk wintering range. The BLM management of the acquired parcel will benefit wildlife (see FEIS Sections 3.7.2.1 and 4.7.1.1), the Stump Creek ACEC (see FEIS Section 4.7.1.1), and the public (see FEIS Section 4.10.1.).

The BLM complied with FLPMA’s Section 203 criteria in identifying lands for sale and exchange in in the FEIS for the Proposed Dairy Syncline Mine and Reclamation (BLM 2019).

## ***FLPMA – Consistency with the Forest Service Plan***

### ***Yellowstone to Uintas Connection and Kiesha’s Preserve***

***Jason L. Christensen and John Carter***

**Issue Excerpt Text:** The ARMP (p10) states that BLM planning regulations require its plans to be consistent with officially approved or adopted resource-related plans of other federal, state, local and tribal governments to the extent those plans are consistent with federal laws and regulations applicable to public lands.” This land disposal must demonstrate consistency with the Caribou RFP and its associated FEIS, acknowledge this linkage and address its fragmentation by mining and other activities.

**Summary:**

The BLM's proposed land disposal must be consistent with the Caribou Revised Forest Plan (RFP).

**Response:**

Section 202 (c)(9) of FLPMA requires that “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...” (43 U.S.C. 1712(c)(9)). However, BLM land use plans may be inconsistent with other plans where it is necessary to meet the purposes, policies, and programs associated with implementing FLPMA and other Federal laws and regulations applicable to public lands (43 Code of Federal Regulations [CFR] 1610.3-2(a)).

In accordance with this requirement, the BLM has worked closely with the Caribou-Targhee National Forest (CTNF) during preparation of the FEIS. Although the BLM is responsible for evaluating mining proposals and issuing decisions related to the phosphate leases, the United States Forest Service (USFS) is responsible for surface management of National Forest System lands and authorizing special uses outside of the phosphate leases. Section 1.4, *Relationship to Agency Policies, Plans, and Regulations*, describes the management prescriptions from the Caribou National Forest RFP applicable to the project, and how the proposed action complies with the surface management prescriptions (FEIS, pp. 1-18–1-19) including:

- Prescription 2.7.2 (d) – Elk and Deer Winter Range;
- Prescription 2.8.3 – Aquatic Influence Zone;
- Prescription 3.2 (b) – Semi-primitive – Recreation;
- Prescription 5.2 (b, c, and f) – Forest Vegetation Management;
- Prescription 6.2 (b) – Rangeland Vegetation Management;
- Prescription 8.2.1 – Inactive Phosphate Leases; and
- Prescription 8.2.2 (g) – Phosphate Mine Areas (USFS 2003).

The FEIS in Appendix 4a provides a consistency review of the RFP and BLM's ARMP. The USFS has considered these criteria to determine Forest Plan conformance of the land exchange portion of the Preferred Alternative. The USFS has identified the Preferred Alternative as their Selected Alternative in their draft project ROD. These actions indicate that the BLM associated land sale for the tailings pond are consistent with the Caribou RFP.

The BLM satisfied FLPMA's consistency requirement in preparation of the ARMP.

***NEPA – Inadequate Analysis******Yellowstone to Uintas Connection and Kiesha's Preserve***

***Jason L. Christensen and John Carter***

**Issue Excerpt Text:** There is no analysis of the baseline condition of the parcels involved, road densities, livestock grazing impacts or wildlife presence, trends and viability of special status species. There is no analysis of the numerous Goals, Objectives or Actions provided in the Pocatello ARMP. An outline of these is included as a checklist in Attachment 3. (Att 3). The relative and fair market values of the parcels are not provided for comparison. There is no analysis as to how management of the Stump Creek ACEC differs from that on the private land to be donated, or for that matter for the BLM managed lands in the project area, including the disposal parcel. There is no hard look as NEPA requires.

***Yellowstone to Uintas Connection and Kiesha's Preserve******Jason L. Christensen and John Carter***

**Issue Excerpt Text:** According to the DROD, BLM proposed a direct land sale and acceptance of a donation parcel to accommodate the tailings pond which is part of the Dairy Syncline project. According to the DROD (p8), the mine permittee, J.R. Simplot Co. applied to purchase 1,142.1 acres of BLM land and to also donate a parcel containing 440 acres. The rationale given in the DROD (p8) for this transaction was that BLM “does not believe managing a tailings pond on public lands is in the best public interest when instead the lands could be replaced with lands unencumbered with a tailings pond that contain high resource values.” The proposed land sale would require an amendment to the Pocatello ARMP which does not clarify that each parcel in Zone 3 lands meets the FLPMA Section 203(a) criteria. The FEIS (p2-16) provides a further rationale that BLM also does not “want to incur the potential recreation liability of the facility - BLM prefers that Simplot should bear these responsibilities instead.” The FEIS (p1-5) states that “If the land sale and/or land exchange occurs IDL and IDEQ would then regulate the tailings pond facility”. There is no analysis of the differential requirements between BLM and IDL/IDEQ as to this management. While this is a US Forest Service DROD, the document (p13) explains that BLM administers the phosphate leases under the Mineral Leasing Act of 1920 and for on-lease operations. The US Forest Service, as the surface management agency, is consulted by BLM regarding protection of National Forest resource values. The DROD (Table 2, p12) shows that BLM and the Forest Service have agreed to Alternative 3, which is a Reduced BLM land sale comprising 500 acres in which “BLM receives full fair market value and 440-acre donation parcel in elk winter range and GHMA, adjacent to ACEC”. This land sale and exchange would still be inadequate to accommodate the tailings pond.

***Yellowstone to Uintas Connection and Kiesha's Preserve******Jason L. Christensen and John Carter***

**Issue Excerpt Text:** This sale and donation, if it occurs, results in a net loss of 60 acres of public lands which does not meet the ARMP priority for maintaining public land ownership. The second part of the rationale, to add high resource value lands that improve the manageability of public lands, is not analyzed in depth, so there is no hard look. There is no comparison of the relative values of the parcel to be sold vs the parcel donated.

**Summary:**

The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan (BLM 2019) failed to provide information on baseline conditions and failed to adequately analyze impacts from the land disposal and land exchange.

**Response:**

The National Environmental Policy Act (NEPA) directs that data and analyses in an environmental impact statement (EIS) must be commensurate with the importance of the impact (40 CFR 1502.15), and that NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail (40 CFR 1500.1(b)). The BLM is required to take a “hard look” at potential environmental impacts of adopting the Proposed Dairy Syncline Mine and Reclamation Plan.

The level of detail of the NEPA analysis must be sufficient to support reasoned conclusions by comparing the amount and the degree of change (impact) caused by the proposed action and alternatives (BLM Handbook H-1790-1, Section 6.8.1.2). The BLM need not speculate about all conceivable impacts, but it must evaluate the reasonably foreseeable significant effects of the proposed action.

The baseline data provide the necessary basis to make informed project and land use plan-level decisions. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse. Baseline data for the affected environment for all resources, including the potential acquired/donated parcels, are presented in Chapter 3, *Affected Environment*, of the FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan (BLM 2019). For example, the baseline data presented in the transportation section, which include road densities, were collected from the CTNF RFP, the CTNF Revised Travel Plan, and the Final Baseline Technical Report on Recreation and Transportation/Access Resources (see FEIS Section 3.14, pp. 3-247–3-255). Baseline conditions for grazing management were established by reviewing existing data, including county land use ordinances, BLM documents (ARMP, Mineral Reports), CTNF documents (RFP, Memorandum of Understanding, Forest Service Manuals), and Federal databases (see FEIS Section

3.11, pp. 3-233–3-238). For wildlife and special status species, background information and a summary of survey results and habitat assessments used as baseline data are from the Wildlife Resources Technical Report (see FEIS Section 3.7, pp. 3-155–3-178).

The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan analyzes requirements of the BLM and Idaho Department of Lands (IDL) and IDEQ management in Chapter 4 for the Proposed Action, which includes the land sale and plan amendment (see FEIS Chapter 4, pp. 4-7–4-12, 4-13–4-72, 4-87, 4-136, and 4-137). As a result of the IDL and IDEQ requirements for the tailings facility, there would be little variability in the design or management for the facility under any alternative and therefore little difference in the impacts of such a facility. Nevertheless, the FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan analyzes a reasonable range of alternatives, including Alternative 3, which contemplates an RMP amendment and the sale of fewer acres to the proponent. The FEIS also analyzes Alternative 2, which does not include the plan amendment or land sale, but rather considers permitting the tailings facility on public lands under a right-of-way. While the ownership of the tailings pond would not change the potential environmental impacts, the added benefits of the donation parcel along with receipt of the assessed value of the parcel provide a benefit to the public and mitigate the impacts of the tailings facility and maintain the public land base. The agency Preferred Alternative was formulated to consist of the USFS land exchange, with the accompanying donation parcel, in an effort to ensure that the public will greatly benefit from the land tenure adjustments and other components of the alternative.

The BLM complied with NEPA’s requirement to analyze the environmental consequences/impacts from the disposal (BLM) and land exchange (USFS) in the FEIS for the Proposed Dairy Syncline Mine and Reclamation.

## ***NEPA – Range of Alternatives***

### ***Yellowstone to Uintas Connection and Kiesha’s Preserve***

***Jason L. Christensen and John Carter***

**Issue Excerpt Text:** The FEIS analyzes a range of seven alternatives that include a different access road location, land exchange and land sale options, a selective overburden handling option, and a no action alternative. However, the FEIS does not include an alternative that maximizes wildlife protection and natural resources conservation. This is of concern because of the project’s proposed reliance on voluntary, rather than mandatory, measures to protect greater sage-grouse at a time when the greater sage-grouse plans have still not been finalized with a Record of Decision, and there are differences in the plans’ levels of sage-grouse protection that will affect sage-grouse in the project area.

It is also of concern due to the ongoing fragmentation of a Regionally Significant Wildlife Corridor and linkage habitat for Canada lynx. (Att 1 p40 - 47). A wildlife-and-natural-resources- conservation alternative would be viable and thus should be analyzed in the EIS. “The existence of a viable but unexamined alternative renders an environmental impact statement inadequate.” Idaho Conservation League v. Mumma, 956 F.2d 1508, 1519 (9th Cir. 1992) (quotation omitted).

**Summary:**

The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan (BLM 2019) failed to analyze an adequate range of alternatives as required by NEPA and did not include an alternative that maximizes wildlife protection and natural resources conservation.

**Response:**

When preparing an EIS, NEPA requires an agency to rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives eliminated from detailed study, to briefly discuss the

rationale for elimination (40 CFR 1502.14(a)). When there are potentially a very large number of alternatives, the BLM may elect to only analyze a reasonable number to cover the full spectrum of alternatives (BLM Handbook H-1790-1, Section 6.6.1 quoting Question 1b, Council on Environmental Quality [CEQ], Forty Most Asked Questions Concerning CEQ’s NEPA Regulations, March 23, 1981).

The BLM must analyze a reasonable range of alternatives, but not every possible alternative to a proposed action: “In determining the alternatives to be considered, the emphasis is on what is ‘reasonable’ rather than on whether the proponent or applicant likes or is itself capable of implementing an alternative. ‘Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant’” (BLM NEPA Handbook, H-1790-1, at 50 [citing Question 2a, CEQ, Forty Most Asked Questions Concerning CEQ’s NEPA Regulations, March 23, 1981]; see also 40 CFR § 1502.14).

The BLM developed a reasonable range of alternatives that meet the purpose and need of the Proposed Dairy Syncline Mine and Reclamation Plan and that address resource issues identified during the scoping period. The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan (BLM 2019) analyzed six alternatives, which are described in Chapter 2 (see FEIS pp. 2-1–2-31). Alternatives include an alternative for access (Alternative 1); four alternatives for land tenure actions (Alternatives 2, 3, 4, 5); a selective materials handling alternative (Alternative 6); and a No Action Alternative. The EIS states that the Preferred Alternative has the least environmental impacts of all the action alternatives fully analyzed. Table 2.3-5 of the FEIS provides a comparison of impacts by alternative (see FEIS p. 2-58). The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan did consider other alternatives with a smaller footprint or fewer impacts, but they did not meet the Purpose and Need (see FEIS Section 2.6, pp. 2-48–2-57).

The FEIS analyzed alternatives to the Proposed Action that meet the purpose and need and will reduce impacts of the proposal. The FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan does not address or propose to change BLM or USFS management strategies for wildlife. It is not within the scope of the purpose and need to address management strategies for wildlife in this FEIS. The BLM’s acquisition parcel is in designated elk winter range and is adjacent to the existing Stump Creek ACEC, which is managed for elk winter range. The BLM acquisition parcel is also within a sage-grouse General Habitat Management Area and would be managed as such. In addition, habitat surveys conducted on the parcel indicate that 359 acres of the parcel are greater sage-grouse brooding/rearing habitat.

The parcel that would be acquired by the USFS contains approximately 370 acres aspen/conifer mix, which provides high-quality services to numerous species. In addition, this parcel abuts, on three sides, the Sage Creek Roadless Area, specifically the Backcountry Roadless theme. The USFS intends to add all applicable acres to the Roadless Area. The Roadless Areas are largely undisturbed National Forest System lands and the addition of these lands will enlarge the existing Roadless Area, and this benefits both wildlife and the public. Impacts on wildlife are analyzed in detail in Section 3.7 (see FEIS pp. 3-155–3-178) and Section 4.7 (see FEIS pp. 4-96–4-124).

The BLM considered a reasonable range of alternatives in the FEIS for the Proposed Dairy Syncline Mine and Reclamation Plan in full compliance with NEPA.

## References

- Bureau of Land Management (BLM). 2019. *Final Environmental Impact Statement for the Proposed Dairy Syncline Mine and Reclamation Plan*. Available: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=44904> (accessed December 19, 2019).
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