

1.0 Purpose and Need for the Plan Amendment

1.1 Introduction

The *Rawlins Field Office (RFO) Resource Management Plan (RMP) Record of Decision (ROD)* (2008b) included a remand of the visual resource management (VRM) class designation and decision portions of the Approved RMP. In response to a protest, the BLM remanded the VRM decisions to allow a current inventory of visual quality to be completed (BLM Handbook H-1601-1, *Land Use Planning*). The VRM class designations and decisions will be reevaluated and subject to subsequent analysis required under the National Environmental Policy Act of 1969 (NEPA; Title 42 United States Code [USC] Section 4321, et seq.). The Federal Land Policy and Management Act of 1976 (FLPMA) regulations pertaining to land use planning found at 43 Code of Federal Regulations (CFR) Part 1600 require the BLM to manage the public lands and their various resources, including visual resources, so that they are used in the combination that will best meet the present and future needs of the American people.

The 2008 Rawlins RMP VRM remand states that VRM decisions in the 2008 Approved Rawlins RMP will use the VRM class designations as established and analyzed in the No Action Alternative (Alternative 1 in the 2008 Proposed Rawlins RMP Final Environmental Impact Statement [EIS]) until updated and/or changed by a VRM-targeted Plan Amendment. At this time, an RFO area-wide Plan Amendment for VRM decisions has not occurred. For this reason, a VRM-targeted Plan Amendment is being conducted concurrently with the development of the Chokecherry and Sierra Madre (CCSM) Wind Energy Project EIS (detailed in Volume II). The proposed project would consist of two wind farm sites located near each other (approximately 9 miles apart) within the CCSM Wind Site Testing and Monitoring Application Area, totaling 229,077 acres of public, private, and state land, Application Areas for rights-of-way (ROWs) of ancillary facilities, and the areas considered for haul road and transmission connection between the Chokecherry and Sierra Madre sites, collectively referred to as the “Application Area” (**Figure 1-1**).

A majority of the Application Area is designated as VRM Class III, but a portion of the Sierra Madre site is identified as VRM Class II. Wind energy development typically is not considered to be compatible with VRM Class I; VRM Class II within the Foreground/Middleground and Background Distance Zones; and VRM Class III within the Foreground/Middleground Zone. Therefore, the proposed CCSM project does not conform to the VRM direction provided in the 2008 Rawlins RMP. In this situation, the BLM can either require modifications to the proposed CCSM project to be in compliance, consider an amendment of the VRM decisions in the 2008 Rawlins RMP, or deny the ROW application. Through Volume I of this EIS, the BLM is considering options for amending the VRM decisions in the CCSM project Decision Area. As part of the ROD, the BLM will decide whether to amend the VRM decisions in the CCSM project Decision Area as a prerequisite to approval of the CCSM project.

The BLM has completed a visual resource inventory (VRI) for the RFO area (Otak, Inc. 2011). The VRI serves as a baseline to develop a reasonable range of alternatives for VRM classes and analysis of impacts associated with the various alternatives in this project-specific Plan Amendment. VRM class designations will be considered and analyzed in a future VRM-targeted Plan Review for the remainder of the RFO area.

The focus of the impact analysis is the effect of various VRM classes proposed under the alternatives on other resources and resource uses. Since VRM-targeted planning decisions may influence the implementation of existing 2008 Rawlins RMP decisions for other resources and resource uses, the Plan Amendment also includes analyses of potential changes to management decisions that would be in conflict with the VRM Plan Amendment alternatives.

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<ul style="list-style-type: none"> Planning Area Decision Area Chokecherry and Sierra Madre Application Area Interstate Highway U.S. Highway State Highway 	<p>Legend</p> <p>Land Owner</p> <ul style="list-style-type: none"> Bureau of Land Management Bureau of Reclamation U.S. Fish and Wildlife Service U.S. Forest Service Private State
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Wind Energy Application Area

Figure 1-1

VRM Plan Amendment
Planning Area and Decision Area

1:900,000

1.2 Purpose and Need

1.2.1 Background

An RMP guides management actions and allowable uses for public lands and resources identified and addressed by the plan. Land use plan decisions establish goals and objectives for resource management, the measures needed to achieve goals and objectives, and parameters for using BLM lands or resources. Land use plan decisions identify lands that are open to, or available for, certain uses, including any applicable restrictions, and lands that are closed to certain uses. Land use plan decisions ordinarily are made on a broad scale and customarily guide subsequent site-specific implementation decisions. Land use plan decisions are made according to the procedures of BLM's planning regulations in 43 CFR 1600. The BLM prepares an Environmental Assessment or EIS in conjunction with an RMP to disclose impacts of actions and analyze reasonable alternatives (see Reader's Guide in Section 1.6).

Plan amendments (see 43 CFR 1610.5-5) change one or more of the terms, conditions, or decisions of an approved land use plan. These decisions may include those relating to desired outcomes; measures to achieve desired outcomes, including resource restrictions; or land tenure decisions. Plan amendments are most often prompted by the need to:

1. Consider a proposal or action that does not conform to the plan;
2. Implement new or revised policy that changes land use plan decisions;
3. Respond to new, intensified, or changed uses on public land; and
4. Consider significant new information from resource assessments, monitoring, or scientific studies that change land use plan decisions.

The BLM regulations in 43 CFR 1600, 43 CFR 46, and the NEPA process detailed in the Council on Environmental Quality (CEQ) regulations in 40 CFR 1500 guide preparation of Plan Amendments. The process is tailored to the anticipated level of public interest and potential for significant impacts.

Until the VRM Plan Amendment is completed, the 2008 Rawlins RMP provides current guidance and direction for VRM of public lands in the Decision Area.

1.2.2 Purpose

Section 102 of the FLPMA sets forth the policy for periodically projecting the present and future use of public lands and their resources through the use of a planning process. FLPMA Sections 201 and 202 are the statutory authorities for the land use plans prepared by the BLM. The purpose or goal of the land use plan is to ensure public lands and resources are managed in accordance with FLPMA and the principles of multiple use and sustained yield.

The purpose is to establish new VRM class designations based on the VRI completed in 2011 (Otak, Inc. 2011) and consideration of: 1) managing the public lands and their various resources so that they are used in the combination that will best meet the present and future needs of the American people in accordance with FLPMA 103(c); 2) managing public lands in a manner that will protect the quality of scenic values in accordance with FLPMA 102(b); 3) the impacts resource uses may have on scenic values; and 4) the impacts VRM class designations may have on other resources and uses. The RMP amendment also will address the remand of the VRM class designation and decision portions of the Proposed RMP for a portion of the RFO (see Decision Area discussed in Section 1.5). Updating the management actions for visual resources based on information from the recent VRI will allow the BLM to provide better management of visual resource values.

1.2.3 Need

The 2008 Rawlins RMP included a remand of the VRM class designation and decision portions of the Approved RMP. The BLM continues to use the VRM class designations as established and analyzed in the No Action Alternative (Alternative 1 in the 2008 Proposed Rawlins RMP Final EIS; 2008a) until updated and/or changed by a VRM-targeted Plan Amendment. The remand was required to resolve a protest related to the BLM guidance requiring that VRM class determinations be supported by a current inventory of visual quality (BLM Handbook H-1601-1 *Land Use Planning*). The proposed CCSM Wind Energy Project does not conform to the existing VRM Class designations in the 2008 Rawlins RMP. The BLM has completed a VRI for the RFO (Otak, Inc. 2011). Since an area-wide Plan Amendment for VRM decisions in the RFO has been initiated, but is not complete, the BLM is using the opportunity to update the VRM classes based on the new VRI data concurrently with the development of the CCSM Wind Energy Project EIS (detailed in Volume II).

1.3 Decisions to be Made

This VRM-targeted Plan Amendment will determine the appropriate management actions for visual resources on public lands in the Decision Area (defined in Section 1.5) and amend the associated decisions in the 2008 Rawlins RMP. The public lands in the Decision Area are the subject of this Plan Amendment and the associated EIS analysis. Lands or minerals that are privately owned or state-owned or that are administered by federal agencies other than the BLM, such as the United States (U.S.) Forest Service (USFS) and the Bureau of Reclamation (BOR), are not affected by BLM management. Other BLM management actions beyond the scope and geographic extent of this VRM-targeted Plan Amendment will not be affected.

1.4 Planning Area for VRM Plan Amendment

The BLM completed an assessment of the visual zone of influence for wind turbine generators (WTGs) considered in the CCSM project (AECOM 2011), the results of which formed the basis of the Planning Area boundary and is summarized in this section.

The CCSM Draft EIS (Volume II) describes the visual resource analysis area as “the visible areas (or viewsheds) of all proposed project facilities, from the Application Area to beyond the background distance zone (approximately 30 miles) (as shown in **Figure 3.12-1** in Volume II). At 30 miles, the motion of a WTG is generally not discernible although project facilities and night lighting are generally still identifiable.” There are three factors that influence the visual resource analysis area:

- Consistency with BLM VRM class management objectives;
- Literature review of comparable wind energy visual assessments; and
- Field observations of the CCSM physiographic region and physiographically similar locations of other wind farms.

In evaluating all three factors, it was concluded that an analysis area of nominally 30 miles is sufficient to provide a complete and accurate assessment of the day and nighttime impacts of the CCSM project on RFO area visual resources and future management considerations. This distance is greater than both the VRM background distance zone and all literature reviewed, due to the vast Wyoming landscape which permits long-range views, nighttime lighting (due to generally dark to very dark Wyoming night skies), and the 100-meter (m) hub-height of WTGs (as most literature considered WTGs less than 100 m). Based on field observations of existing wind energy projects in operation within the RFO area (AECOM 2011), daytime evaluations of WTGs at 30 miles and beyond appear to suggest only inconsequential contrasts and the limits of visibility to the human eye quickly are approached. However, nighttime lighting contrasts appear to continue to attract attention up to 30 miles.

The northern and southern boundaries of the 30-mile radius were further refined to consider other management considerations. Boundaries for the 30-mile area were reduced to the northern extent of the checkerboard landownership (see Glossary) since the blocked federal lands north of this boundary would require consideration of factors beyond this Plan Amendment that would be better addressed in the RFO area-wide VRM-targeted Plan Amendment. Boundaries for the 30-mile area were reduced to the Wyoming state line on the south since the BLM RFO jurisdiction does not extend past the state line. In addition, the Planning Area was extended to include a small swath of isolated lands in the southeast area of the Saratoga Valley extending to the Wyoming state line that is geographically connected to, and influenced by, the Planning Area decisions.

Therefore, a nominally 30-mile radius around the CCSM Wind Energy Project was delineated as the Planning Area boundary for the VRM Plan Amendment. All or any portion of the Planning Area could be used in the alternatives (see Section 1.5 for delineation of the Decision Area). The Planning Area is identified in **Figure 1-1** and jurisdiction within the Planning Area is detailed in **Table 1-1**.

1.5 Decision Area for VRM Plan Amendment

The BLM developed a range of alternatives for VRM classes within the VRM Plan Amendment Planning Area. The alternatives define VRM classes within a Decision Area, which is a smaller area within the Planning Area boundary (**Figure 1-1**). The remaining area outside the Decision Area boundary (but within the Planning Area boundary) will be addressed in the VRM Plan Amendment for the RFO area.

Numerous factors were reviewed to determine whether decisions in this Plan Amendment should encompass the entire Planning Area. As depicted in **Figure 1-1**, the checkerboard land pattern constitutes a large swath of land through the northern portion of the Planning Area. High wind potential occurs in much of the northeastern portion of the Planning Area (depicted in **Figure 3-2** in Chapter 3.0). Additionally, designated utility corridors follow Interstate 80 (I-80) and State Highway (SH) 789 (depicted in **Figure 3-1** in Chapter 3.0), and extensive oil and gas leasing occurs through much of the western portion of the Planning Area (depicted in **Figure 3-3** in Chapter 3.0).

With the multitude of additional influences on visual resources, BLM determined that the Decision Area for this analysis should focus on those areas that were most likely to be influenced by the CCSM Wind Energy Project proposal as well as other features that influence the visual setting including landownership patterns and major transportation and utility corridors in the area. The SH 789 designated overhead utility corridor was selected as the western boundary as the overhead utility corridor would influence any visual resource decisions to the west of that corridor. The I-80 designated overhead utility and major transportation corridor was selected as the northern boundary since visual resource decisions to the north would be influenced by these corridors. To the east, the Scenic Quality Rating Unit (SQRU) encompassing Elk Mountain would serve as the northeastern boundary as viewshed analyses concluded that the CCSM project would not be visible beyond Elk Mountain. The eastern and southern boundaries were delineated by the USFS boundaries and Wyoming state line.

1.6 Reader's Guide to the RMP Plan Amendment Process

The 43 CFR 1610 regulations establish procedural requirements for BLM's land use planning process. These regulations include the requirement that land use plans (RMPs) are developed, proposed, and approved using NEPA regulations (40 CFR 1500-1508) for preparing an EIS and Department of the Interior regulations to implement NEPA (43 CFR 46). The following NEPA processes and environmental documents were used to prepare the VRM-targeted Plan Amendment (shown in **Table 1-2**).

Table 1-1 Land and Minerals Ownership and Administrative Jurisdiction within the VRM Plan Amendment Planning Area

Jurisdiction	Acres¹
Areas within the VRM Plan Amendment Planning Area:	
A. Public land/federal minerals ²	1,351,551
B. Public land/nonfederal minerals ³	80,018
C. Nonpublic land/federal minerals ⁴	283,048
Total BLM-administered public land surface within the VRM Plan Amendment Planning Area	1,428,294
Total BLM-administered federal mineral estate within the VRM Plan Amendment Planning Area	1,634,599
Other federal lands and minerals that WILL NOT be covered by the VRM Plan Amendment:	
D. USFS land/federal minerals ⁵	355,540
E. BOR land/federal minerals ⁵	20,711
F. U.S. Fish and Wildlife Service (USFWS) land/federal minerals ⁵	80
Total BLM-administered federal mineral estate that WILL NOT be covered by the VRM Plan Amendment	376,331
Other lands that WILL NOT be covered by the VRM Plan Amendment:	
G. Department of Defense land	0
H. Private land/private minerals and state lands/state minerals ⁶	1,553,259
Total land surface area in the VRM Amendment Planning Area (all ownerships)¹	3,664,795

¹ Because of land surface and mineral ownership overlaps and administrative responsibility overlaps, acreage figures for different jurisdictions do not add up to the total acreage.

² In areas where the public land surface and federal mineral estate are both administered by the BLM, the VRM Plan Amendment will include planning and management decisions for only the land surface.

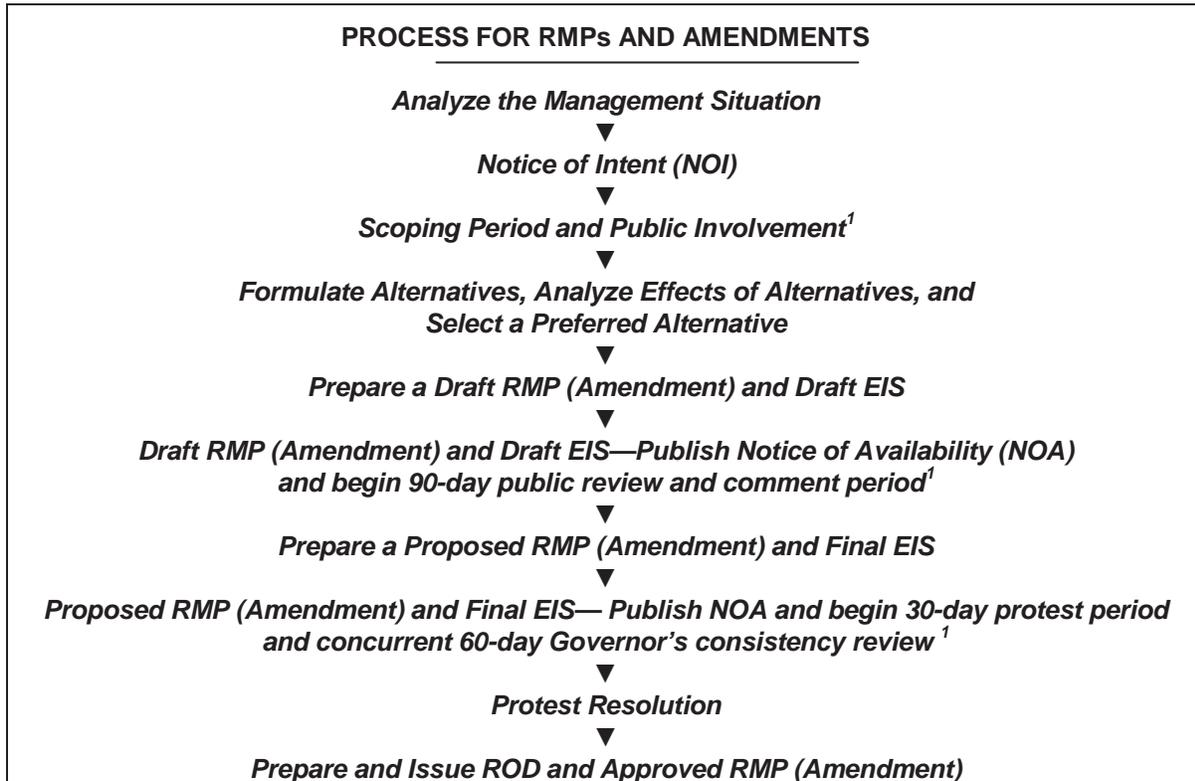
³ In areas where the public land surface is administered by the BLM, and the minerals are privately owned or owned by the State of Wyoming or local governments, the VRM Plan Amendment will include planning and management decisions for only the BLM-administered public land surface. Although these surface management decisions may have some effect on the ability to manage and develop the non-federally owned minerals, the VRM Plan Amendment planning and management decisions will not pertain to the nonfederal mineral estate. At the same time, surface and minerals management actions and development activities anticipated in these areas will be taken into account for the purpose of cumulative impact analysis in the VRM Plan Amendment.

⁴ In areas where the land surface is privately owned or owned by the State of Wyoming or local governments, and the minerals are federally owned, the VRM Plan Amendment will include planning and management decisions for only the BLM-administered federal mineral estate. While the land and resource uses and values on the nonfederal surface will be taken into account and will affect development of the federal mineral planning and management decisions, these decisions will not pertain to the state and privately owned land surface. At the same time, surface and minerals management actions and development activities anticipated in these areas will be taken into account for the purpose of cumulative impact analysis in the VRM Plan Amendment.

⁵ In areas where the public land surface is administered by the USFS, BOR, or USFWS, and the federal mineral estate is administered by the BLM, the land surface planning and management decisions are the responsibility of these "other" federal or state surface management agencies. Any BLM administrative responsibilities within these areas (e.g., actions concerning the federal mineral estate) are handled case by case and are guided by the other surface management agencies' policies, procedures, and plans. At the same time, surface and minerals management actions and development activities anticipated in these areas will be taken into account for the purpose of cumulative impact analysis in the VRM Plan Amendment.

It also is important to note that, while other BLM responsibilities include surface management of certain public lands withdrawn for purposes of the BOR, they are carried out in accordance with an interagency agreement between the two agencies. Administrative jurisdiction (including land use planning) for these lands lies with the BOR.

⁶ The VRM Plan Amendment will not include any planning and management decisions for areas where the land surface and minerals are both privately owned or owned by the State of Wyoming or local governments.

Table 1-2 The NEPA Process for RMP and Amendments Approval

¹ Public input period starts on the date of the federal notice publication in the *Federal Register*.

Analyze the Management Situation – The current conditions and trends of the resources and the uses/activities that will relate to potential decisions in the Plan Amendment are documented in an Analysis of the Management Situation (AMS) report (BLM 2003a). With the selection of the No Action Alternative in the recently completed 2008 Rawlins RMP, the current management situation and the current condition of most of the data/information contained in the AMS (BLM 2003a) for the 2008 Rawlins RMP is still valid for this Plan Amendment. The seven elements of an adequate AMS are, for the most part, already contained in the administrative record for the 2008 Rawlins RMP. The 2008 Rawlins RMP administrative record will be augmented by the completion of the VRI report (Otak, Inc. 2011) for the RFO Planning Area.

Issue Notice of Intent – BLM published an NOI in the *Federal Register* on July 25, 2008. This was to announce its intent to prepare the CCSM Wind Energy Project EIS. The NOI identified that the wind energy project may not conform to the existing 2008 Rawlins RMP and that a Plan Amendment may be required.

Conduct Scoping – A 60-day scoping period began on July 25, 2008. The scoping period provided the public with an opportunity to identify concerns and issues with development of the wind energy project and a potential Plan Amendment. Results are documented in a scoping report.

Formulate Alternatives – An alternative, in the case of this VRM-specific Plan Amendment, will include a reasonable mix of VRM classes. In compliance with the NEPA, CEQ regulations, and BLM planning regulations and guidance, alternatives must respond to the purpose and need to be reasonable and must be capable of implementation. The No Action Alternative is taken directly from the 2008 Rawlins

RMP. In addition to the No Action Alternative, three action alternatives were developed as discussed in Chapter 2.0 of this EIS to provide an adequate range of alternatives to analyze in detail, and to provide a good basis for comparative impact analyses.

Analyze Effects of Alternatives – A detailed analysis of each alternative is included in Chapter 4.0 of this EIS.

Select a Preferred Alternative – Based upon the analyses of the alternatives, the BLM's Preferred Alternative was selected and analyzed in detail in the Draft EIS. The Preferred Alternative is composed of management options from the other alternatives, thereby providing the best balance of management actions that are capable of resolving existing management issues in the Planning Area.

Prepare a Draft RMP Amendment and Draft EIS – The VRM-targeted Plan Amendment was completed concurrently with, and is included as Volume I in, the CCSM Wind Energy Project Draft EIS.

Publish a NOA – A NOA was published in the *Federal Register* to announce the availability of the Draft RMP Amendment and Draft EIS for public review and comment.

Provide a 90-day Comment Period – Publication of the NOA begins a 90-day public review and comment period (concurrent with the CCSM Wind Energy Project Draft EIS comment period).

Prepare a Proposed RMP Amendment and Final EIS – Following the public review and comment period on the Draft Plan Amendment, the Proposed RMP Amendment and Final EIS was prepared (concurrently with the development of the CCSM Wind Energy Project Final EIS). The primary difference between the draft and final Plan Amendments is that the focus is on the “Proposed VRM Decisions.” Based upon public comment, any new information and correction of errors, the Proposed RMP Amendment and Final EIS presents the Proposed VRM Class Decisions (which was a refinement of the Preferred Alternative presented in the Draft EIS based on public and agency comments).

Publish NOA – A NOA is published in the *Federal Register* to announce the availability of the Proposed RMP Amendment and Final EIS for public review and comment.

Provide a 30-day Protest Period and Resolve Protests – A 30-day protest period and 60-day Governor's consistency review (concurrent with the CCSM Wind Energy Project Final EIS comment period) commences with the BLM's publication of an NOA in the *Federal Register* of the CCSM Wind Energy Project Final EIS and Proposed RMP Amendment and Final EIS. During the 30-day period, protests of the State Director's Proposed RMP Amendment may be submitted to the BLM Director and comments may be submitted to the BLM on the CCSM Wind Energy Project Final EIS. Any protests submitted will be resolved in the ROD.

Prepare ROD and Approved RMP Amendment – Following resolution of protests to the VRM-targeted Proposed RMP Amendment, the State Director may approve the VRM RMP Amendment. This approval is documented in a ROD (**Table 1-2**) and issued to the public. This decision may occur concurrently with the ROD for the CCSM Wind Energy Project.

1.7 Agency Roles and Relationships

NEPA regulations provide for a lead agency's inclusion of federal, state, and local governments in the development of the EIS and in the BLM's planning process. This section identifies roles and responsibilities of both the BLM lead agency and cooperating government agencies.

1.7.1 BLM

The BLM is the lead agency for the EIS process. The lead agency takes primary responsibility for preparing the EIS as well as requesting the participation of each cooperating agency. According to federal regulations, the lead agency is to request the participation of each cooperating agency in the EIS process at the earliest possible time. Furthermore, the lead agency must use the environmental analysis and proposals of cooperating agencies with jurisdiction-by-law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency.

1.7.2 Cooperating Agencies

Upon request of the lead agency, any other federal agency that has jurisdiction by law can be a cooperating agency (also called a cooperator). In addition, any other federal agency that has special expertise with respect to any environmental issue that should be addressed in the EIS may be a cooperating agency upon request of the lead agency and acceptance by the agency. An agency also may request the lead agency to designate it a cooperating agency.

The concept of cooperators has been extended in recent years from federal agencies to include state and local government agencies. This inclusion of state and local government agencies as cooperating agencies is consistent with BLM's planning approach and policies. Any designated federal, state, or local government agency that becomes a cooperator is required to sign a Memorandum of Understanding (MOU) on its specific roles and responsibilities.

The primary role of the cooperating agencies is to provide input during the EIS process on issues for which they have special expertise or jurisdiction. Cooperating agencies may participate in the process in a role similar to that of any BLM interdisciplinary team member (e.g., BLM rangeland management specialists, wildlife biologists). They also serve as reviewers of draft information and give overall advice on the EIS process. Cooperators meet with the lead agency periodically throughout the EIS process to discuss EIS issues as a group. Staffs from cooperating agencies are available to enhance the interdisciplinary capability of the lead agency by providing needed information throughout the NEPA process.

The following agencies with jurisdiction, special expertise, or interest in the 2008 Rawlins RMP development process have agreed to participate in the EIS process as cooperating agencies:

- USFS (Medicine Bow-Routt National Forest and Thunder Basin National Grasslands);
- State of Wyoming (including 12 departments);
- Carbon County (including 4 departments);
- Little Snake River Conservation District;
- Saratoga Encampment Conservation District;
- Medicine Bow Conservation District; and
- City of Rawlins.

The BLM has engaged cooperating agencies throughout the process through participation in workshops, meetings, and document reviews. An initial interested agency meeting held on September 15, 2008, was attended by 22 interested agency personnel, including representatives from the Wyoming Game and Fish Department (WGFD), the Wyoming Department of Environmental Quality (WYDEQ), the USFWS, the State Historic Preservation Office (SHPO), Carbon County, and local conservation districts. Cooperating agency participation occurred at key milestones in the project including scoping, alternatives development, data gathering for the affected environment, impact analysis, and preliminary draft reviews of Volumes I and II of the Draft EIS and Final EIS.

1.8 Anticipated Planning Issues and Management Concerns

The process for developing, amending, or revising an RMP begins with identifying the issues (43 CFR 1610.4-1). Some of the issues addressed in the EIS for the current 2008 Rawlins RMP were reviewed and found to be applicable to this Plan Amendment. Specific questions and concerns relative to the VRM Plan Amendment have been added to the RMP issue statements.

The VRI (Otak, Inc. 2011) addresses the issues raised in the RMP remand and provides the baseline visual resource condition information necessary to make informed VRM class designations within the Planning Area.

1.8.1 Issues Identified for Purposes of this Plan Amendment

The following planning issues were identified through public scoping and information gathered during analysis of the existing management situation for the 2008 Rawlins RMP. These issues are based on the input of BLM personnel, the public, and interagency consultation associated with the 2008 Rawlins RMP. The issues (slightly modified to be consistent with a Plan Amendment) have been determined adequate for this VRM targeted Plan Amendment.

ISSUE 1: Development of Energy Resources and Minerals-Related Issues

Surface disturbance and human presence associated with energy resource development (i.e., oil and gas, coal, solar and wind energy) influence viewsheds, recreation values, important wildlife habitats (i.e., big game, greater sage-grouse, plovers, raptors and fish), forage uses, air quality, sensitive vegetation types, and sensitive watersheds. Questions to be answered in the VRM Plan Amendment include:

1. Are sufficient measures being taken to ensure protection of visual values?
2. Are current VRM class designations consistent with decisions regarding what public lands are available for energy and mineral development?
3. Is there new coal resource information that would modify the existing VRM class designations?
4. How would VRM class designations influence future opportunities to develop energy and mineral resources?

ISSUE 2: Special Designations/Management Areas

There are unique areas or sensitive lands and resources in the Planning Area that met the criteria for protection and management under special designations/management areas (SD/MAs). There are two wilderness study areas (WSAs; Encampment River Canyon and Prospect Mountain). There is one area designated as an area of critical environmental concern (ACEC [Sand Hills/JO Ranch]) that contains unique resources requiring special management attention. There also are two special recreation management areas (SRMA [Continental Divide National Scenic Trail [CDNST]] and North Platte River) containing recreation values that require special management attention. SD/MAs are shown in the RMP on Maps 2-6 (WSAs), 2-9 (ACECs), 2-13 (other management areas), 2-18 (National Natural Landmarks [NNLs]), 2-19 (Wild and Scenic Rivers [WSRs]), and 2-47 (historic trails) of the 2008 Rawlins RMP ROD (2008b). The following questions about these areas need to be answered during the Plan Amendment.

1. Are management practices or restrictions for the existing ACECs adequate or will new VRM decisions further support ACEC decisions?
2. Will current VRM class designations support special designations/management area decisions?

ISSUE 3: Resource Accessibility

To be used, resources must be accessible (legally and physically) and manageable (the ability to apply constraints or requirements). Portions of the Planning Area are isolated and difficult to access (i.e., legal and physical access) and manage. Land disposals and acquisitions (fee and easements) could provide improved access and manageability of public lands. Questions to be answered include:

1. How should VRM class designations influence public land accessibility (improved or reduced public accessibility)?
2. How should VRM class designations be applied to the checkerboard land pattern (or, other areas with high percentage of intermingled private or state land ownership) that have limited public accessibility?

ISSUE 4: Fire Management Wildland Urban Interface (WUI) Areas

Accelerated growth in and around cities and towns within and adjacent to the Planning Area has increased demands for public land resources. Principal considerations include providing for healthy air and water quality, preventing water source depletion, reducing accelerated erosion in critical watersheds, and preventing fragmentation of critical wildlife habitat. Considerations also include providing for development patterns, transportation and utility corridor planning, and demands for open space and recreational uses, land tenure adjustments and wildland fire management. Questions to be answered include:

1. Do VRM class designations influence the WUIs?
2. Do VRM class designations influence where urbanization (any development) should ultimately occur?

ISSUE 5: Special Status Species Management

Attention is needed to address management of special status species (threatened and endangered, proposed, candidate, and sensitive plant and animal species) and the interrelationships of these species with other resource uses and activities. Principal considerations include management of habitat to ensure continued use by various species. Questions to be answered include:

1. Do VRM class designations influence special status species management either positively or negatively?
2. Does special status species presence or potential habitat presence influence VRM class designation?

ISSUE 6: Water Quality

Federal and state requirements for addressing water quality within the Planning Area will warrant additional attention as the RMP is implemented and updated. In general, surface-disturbing activities from BLM-approved activities are designed to reduce non-point pollution sources throughout the Planning Area and should be addressed in relation to their impact on water quality. Questions to be answered include:

1. How do VRM class designations indirectly influence water quality, fisheries habitat, and riparian habitat health?
2. Do water quality, fisheries habitat, and riparian habitat health influence VRM class designations?

ISSUE 7: Vegetation Management

There are conflicting demands for consumptive and non-consumptive uses of the vegetation resources in the Planning Area. The basic problem is maintaining resource values and non-consumptive uses while allowing for consumptive uses. Resource values include vegetative cover, watershed protection, maintenance and enhancement of riparian areas, soil stabilization, and maintenance and enhancement of wildlife habitat (particularly big game crucial winter range and habitat for candidate, sensitive, proposed, or threatened and endangered wildlife and vegetative species). Vegetative consumptive uses include livestock, wildlife and wild horse grazing, forest management, off-road vehicle use, vegetation removal by mineral development, ROWs construction, and surface disturbing activities. Questions to be answered include:

1. Do VRM class designations influence vegetation management or Rangeland Health?

ISSUE 8: Recreation, Cultural Resources (including National Historic Trails), and Paleontological Resource Management

Certain resources and areas need protection while others need to be considered for more public recreation. Off-highway vehicle (OHV) use can conflict with other land and resource uses and can cause damage to resources, including wildlife and watershed values and other recreation values. Principal considerations include providing for suitable and sufficient recreation uses and facilities (both dispersed and commercial), VRM direction, OHV road and trail designations including the CDNST, management of paleontological resources and management of cultural and historical resources (of particular concern is protection of the Overland Trail, the Cherokee Trail, expansion era roads, and Native American respected places). Questions to be answered include:

1. Will VRM class designations support trails management including the setting of historic and scenic trails?
2. Would VRM class designations influence how cultural properties and Native American respected places are managed?
3. Would VRM class designations influence how paleontological resources are managed?

1.9 Planning Criteria Identified for Purposes of this Plan Amendment

Planning criteria are the constraints or guidelines that are developed to direct the planning effort for preparation of the VRM-targeted Plan Amendment. The planning criteria serve the following purposes:

- To ensure that the planning effort is focused on the issues, follows and incorporates legal requirements, addresses management of all public land resources and land uses in the Planning Area, and that preparation is accomplished efficiently;
- To identify the scope and parameters of the planning effort for the decision-maker, the interdisciplinary team and the public; and
- Inform the public of what should and should not be expected from the Plan Amendment effort. This includes identification of any planning issues that are not ready for decision-making and that will be addressed only through subsequent activity or implementation planning efforts or in approving public land and resource use authorizations (e.g., livestock grazing allotment management plans, wildlife habitat management plans, other coordinated activity planning, watershed management plans, processing applications for permits for mineral exploration, ROWs).

1.9.1 General Planning Criteria

The general planning criteria developed for the 2008 Rawlins RMP help focus the preparation of planning and management alternatives and the analysis of impacts and to guide selection of the Proposed Plan. Some of the 2008 Rawlins RMP revision planning criteria was used for this VRM-targeted Plan Amendment, where appropriate.

- This planning effort recognizes valid existing rights.
- Actions must comply with laws, executive orders, regulations and policy.
- Lands covered by the planning effort include any/all lands that may affect, or be affected by, the management occurring on the public lands in the Planning Area. However, the Plan Amendment will apply only to the public lands in the Planning Area. Within the Planning Area, BLM management decisions do not apply to non-public land surface or mineral estate, on public lands administered by other federal agencies, or the federal mineral estate underlying public lands administered by other federal agencies.
- A collaborative and multi-jurisdictional approach is used, where possible, to jointly determine the desired future condition and management direction for the public lands.
- To the extent possible, and within legal and regulatory parameters, BLM management and Plan Amendment decisions are consistent with officially approved or adopted resource related plans, and the policies and programs contained therein, of other federal agencies, state and local governments and Indian tribes, so long as the guidance and resource management plans also are consistent with the purposes, policies and programs of federal laws and regulations applicable to public lands, including federal and state pollution control laws as implemented by applicable federal and state air, water, noise, and other pollution standards or implementation plans.
- Planning and management direction are focused on the relative values of resources and not the combination of uses that will give the greatest economic return or economic output.
- Where practicable and timely for the Plan Amendment, current scientific information, research, and new technologies are considered.
- The 2008 Rawlins RMP Reasonably Foreseeable Development (RFD) and Reasonably Foreseeable Action or Activity (RFA) scenarios for all land and resource uses (including minerals) were reviewed, where appropriate, and portrayed based on historical, existing, and projected levels for all programs.
- Existing endangered species recovery plans, including plans for reintroduction of endangered species and other species, are considered. Consultation, coordination, and cooperation with the USFWS will be in accordance with the 2000 BLM/USFWS Interagency MOU regarding Section 7 Consultation. The 2008 Rawlins RMP Biological Assessment and Biological Opinion, and other applicable biological opinions, regarding areas within the Planning Area were considered.

1.9.2 Planning Criteria for Specific Resources

Criteria for Use of Standard Mitigation Guidelines

The BLM will apply the “*Wyoming BLM Mitigation Guidelines for Surface-disturbing and Disruptive Activities*” (detailed in Appendix 1 of the 2008 Rawlins RMP) during analysis and approval of subsequent activities.

Criteria for Coal Screening

Only the first two steps of the coal screening/planning process have been conducted as part of the 2008 Rawlins RMP on areas containing federal coal consistent with regulations found at 43 CFR Subparts 3420 and 3460. Unless public submissions of coal resource information or surface resource issues indicate a need to update these determinations, no additional coal screening determinations or coal planning decisions would occur. The BLM sent out a call for coal data on February 16, 2011, and received two responses. One response indicated no records of coal for the Planning Area and the other response provided information previously submitted in 2008 after issuance of the NOI for the CCSM Wind Energy Project EIS. Since no new information was received, coal screening determinations or coal planning decisions will remain until such time as a lease-by-application is received.

Criteria for Other Leasable Mineral Potential

Other leasable minerals (phosphates, geothermal, etc.) were not addressed in this VRM-specific Plan Amendment. There is no known development potential in the Planning Area for other leasable minerals.

Criteria for Salable Mineral Potential

Salable minerals (sand, gravel, decorative stone, etc.) were not addressed in this VRM-targeted Plan Amendment. The salable mineral occurrence potential and RFD for the 2008 Rawlins RMP was reviewed and used in this VRM-specific Plan Amendment.

Criteria for Withdrawals and Classifications

Under Sections 202(d) and 204(l) of the FLPMA, any classification or withdrawal on public land is subject to periodic review to determine whether or not it is serving its intended purpose and is still needed. These reviews were conducted during the 2008 Rawlins RMP revision planning effort and were not revisited during this VRM-targeted Plan Amendment. Withdrawal reviews will continue and will not be influenced by future VRM-specific Plan Amendments.

Criteria for Wilderness

There are two WSAs, Encampment River Canyon and Prospect Mountain, on public lands within the Planning Area. WSAs are shown on Map 2-6 of the 2008 Rawlins RMP. As a component of all alternatives in the VRM-targeted Plan Amendment, the viewshed “within” the two WSAs will continue to be protected by VRM Class I designation (according to the *Interim Management Policy for Lands under Wilderness Review* and IM-2000-096 – Use of Visual Resource Management Class I Designation in Wilderness Study Areas). There is no directive to protect the viewshed outside the boundary of the WSAs as a benefit or protection for the values “within” the WSAs. However, the impacts of any action on the visual experience of visitors to the WSAs were addressed as part of the environmental analyses of the VRM Plan Amendment.

Criteria for Areas of Critical Environmental Concern

The Sand Hills/JO Ranch ACEC is within the Planning Area. All decisions in the 2008 Rawlins RMP regarding the Sand Hills/JO Ranch ACEC, including ACEC decisions, were not revisited as part of this Plan Amendment. The 2008 Rawlins RMP ACEC remand, to further document consideration of recommendations for designation of potential ACECs in accordance with BLM Manual 1613, is being considered as part of the BLM Wyoming greater sage-grouse Plan Amendment and the RFO area-wide VRM amendment.

Criteria for Wild and Scenic Rivers

The Encampment River within the Encampment River WSA is the only waterway segment suitable for further WSR consideration. Eligibility and suitability determinations from the 2008 Rawlins RMP were not revisited as part of this planning effort.

1.9.3 Key Changes between the Draft RMP and Proposed RMP – A Final EIS

- The BLM has selected Alternative 4 (the Preferred Alternative in the Draft EIS) with modifications resulting from public comments as the Proposed Plan. The modifications in the Proposed Plan include more protective VRM classifications surrounding Elk Mountain and less protective VRM classifications along the North Platte River that coincides with the ROW corridors along I-80 where major utilities are planned.
- In compliance with BLM Washington Office Instruction Memorandum (IM) 2011-154 issued after release of the Draft EIS, the BLM has conducted an inventory to determine whether any lands with wilderness characteristics (LWCs) are present within the Planning Area. The results are discussed in Chapter 3.0.
- As a result of public comments, additional discussion of tourism impacts has been included in the recreation section.
- Additional text changes and clarifications were made in response to public comments.
- Responses to public comments received on the Draft EIS are included in **Appendix M**.