

September 3, 2015

VIA FAX ((307) 775-6203)

Ms. Mary Jo Rugwell
Acting Director, Wyoming State Office
Bureau of Land Management
5353 Yellowstone Road
Cheyenne, WY 82003-1828

Re: Protest of 4 Parcels Proposed for Wyoming BLM's Nov. 3, 2015 Oil & Gas Lease Sale

Dear Ms. Rugwell:

Pursuant to 43 C.F.R. §§ 3120.1-3 and 4.450-2, the Wilderness Society ("TWS") protests the following four parcels proposed for the Wyoming Bureau of Land Management's November 3, 2015 Oil and Gas Lease Sale:

	PARCEL NUMBER	FIELD OFFICE	ACRES
1	WY-1511-007	Rawlins	840.00
2	WY-1511-009	Rawlins	398.62
3	WY-1511-013	Rawlins	1280.00
4	WY-1511-015	Rock Springs	2556.68

TWS is filing this protest because the BLM has not met its obligations to update its inventory of lands with wilderness characteristics in response to new information submitted by the public, evaluate impacts of this lease sale on lands with wilderness characteristics and address information previously submitted by TWS and other parties regarding lands with wilderness characteristics in the Rawlins Field Office (RFO) and the Rock Springs Field Office (RSFO). These obligations arise from the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA), IM 2011-154, and Manuals 6310 and 6320.

As we stated in our comments on the Draft EA, both the RFO and the RSFO are currently updating their wilderness inventories and conducting land use planning processes. TWS has submitted new inventories that meet the requirements of Manual 6310, which the BLM has not yet acknowledged or addressed. In addition, TWS has reviewed and identified procedural and substantive issues with BLM's wilderness inventories for both field offices in comments to the BLM. Until the new information is evaluated, problems with the BLM's inventories are resolved, and the BLM has developed compliant wilderness inventories and evaluated those inventories, the BLM may not commit parcels that may contain wilderness characteristics, including the parcels specified above, to oil and gas development.

We urge the BLM to defer the protested parcels until significant new information in the form of citizen wilderness inventories can be fully evaluated.

STATEMENT OF INTERESTS

The Wilderness Society:

The Wilderness Society has a long-standing interest in the management of Bureau of Land Management lands in Wyoming and engages frequently in the decision-making processes for land use planning and project proposals that could potentially affect citizen-proposed wilderness areas and other wilderness-quality lands managed by the BLM in Wyoming. TWS members and staff enjoy a myriad of recreation opportunities on BLM-managed public lands, including hiking, biking, nature-viewing, photography, and the quiet contemplation in the solitude offered by wild places. Founded in 1935, our mission is to protect wilderness and inspire Americans to care for our wild places.

AUTHORIZATION TO FILE THIS PROTEST

Soren Jespersen is a Planning and Policy Representative of The Wilderness Society and is authorized to file this protest on behalf of TWS and its members.

STATEMENT OF REASONS

I. THE BLM FAILED TO COMPLY WITH FLPMA.

A. BLM has not fulfilled its duties under FLPMA and related policies to inventory and evaluating management alternatives for lands with wilderness characteristics.

In our comments on the Draft EA, we identified several of the fundamental duties imposed by FLPMA and its related policies. Foremost, FLPMA requires that the BLM maintain a current wilderness inventory for public lands under its jurisdiction and consider that inventory during the land use planning process. 43 U.S.C. § 1711(a); *see also Or. Natural Desert Ass'n v. BLM*, 625 F.3d 1092, 1122 (9th Cir. 2010) (confirming the obligation of BLM to consider wilderness characteristics in its planning process). Furthermore, BLM must abide by its own policies that detail how to comply with FLPMA obligations on conducting inventories for wilderness characteristics and considering those inventories during land use planning and in implementing land use plans.

BLM's current policies require the agency to evaluate alternatives to protect lands with wilderness characteristics. Per IM 2011-154:

Consistent with FLPMA and other applicable authorities, the BLM **will continue to consider the wilderness characteristics** on public lands as part of its multiple-use mandate in developing and revising land use plans and **when making subsequent project level decisions**. In accordance with NEPA, BLM offices must analyze the potential effects of proposed actions and alternatives for land use plan decisions on lands with wilderness characteristics when they are present.

(emphases added). In addition, BLM's leasing guidance, IM 2010-117, requires the agency to

review parcels in light of the most current national and local program-specific guidance to **determine availability of parcels for leasing and/or applicable stipulations** (e.g., to address conservation strategies and protect archaeological resources, traditional cultural properties, paleontological resources, specially designated areas on or near BLM-administered lands, sensitive species, watersheds, fisheries and wildlife habitat, visual resources, air quality, and **wilderness qualities**).

(emphases added).

Further, Manual 6310 explicitly directs the BLM to maintain a current inventory and also to update its inventory in response to citizen inventory proposals, among other new information. While the BLM has discretion regarding when to update the inventory, Manual 6310 requires the agency to consider updating its inventory in certain situations, stating:

Regardless of past inventory, the BLM **must maintain and update as necessary**, its inventory of wilderness resources on public lands. In some circumstances conditions relating to wilderness characteristics may have changed over time, and an area that was once determined to lack wilderness characteristics may now possess them. The BLM will determine when it is necessary to update its wilderness characteristics inventory. Under the following circumstances, the BLM **will consider** whether to update a wilderness characteristics inventory or conduct a wilderness characteristics inventory for the first time:

....

3. The BLM has **new information concerning resource conditions, including wilderness characteristics information submitted by the public** that meets the BLM's minimum standard described in the Wilderness Characteristics Inventory Process section of this policy.

4. A **project that may impact wilderness characteristics** is undergoing NEPA analysis.

(emphases added). The inventories submitted by TWS and other conservation groups, both prior to this lease sale and again in conjunction with our comments on the Draft EA, as well as the context of this lease sale triggered BLM's obligation.

Finally, Manual 6310 establishes procedures for conducting wilderness inventories and standards for evaluating the requisite "size," "naturalness" and "outstanding opportunities for primitive and unconfined types of recreation," including the following:

The area must appear to have been affected primarily by the forces of nature, and any work of human beings must be substantially unnoticeable. Examples of human-made features that may be considered substantially unnoticeable in certain cases are: trails, trail signs, bridges, fire breaks, pit toilets, fisheries enhancement facilities, fire rings, historic properties, archaeological resources, hitching posts, snow gauges, water quantity and quality measuring devices, research monitoring markers and devices, minor radio repeater sites, air quality monitoring devices, fencing, spring

developments, barely visible linear disturbances, and stock ponds. . . . **Some human works are acceptable so long as they are substantially unnoticeable. Avoid an overly strict approach to assessing naturalness.**

Undeveloped ROWs and similar undeveloped possessory interests (e.g., mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed.

Manual 6310 at 6, 7, 10 (emphases added).

Here, both the RFO and RSFO are currently updating their wilderness inventories and are still evaluating comments and additional information provided by TWS and the broader public on these inventories. As of August 2015, TWS has submitted four citizen inventories of lands with wilderness characteristics units for lands managed by the Rock Springs Field Office, including lands overlapping parcels offered up in this lease sale, as detailed below. An additional 11 citizen-inventories have been submitted in RSFO by Wyoming Wilderness Association. **BLM has yet to consider or respond to any of the 15 citizen-submitted inventories in RSFO**, all of which meet the "minimum standard for further review" as defined by Manual 6310. *See* BLM Manual 6310 at § .06.B. In fact, neither the EA nor the FONSI even mentions Manual 6310, referring only to IM 2011-154. While the response to comments claims to cite to Manual 6310, the BLM is misconstruing the Manual. The response to comments states:

Manual 6310 states: "...the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of public lands." As such, parcels that have been found to possess wilderness characteristics will be managed according to the applicable RMP. We have properly disclosed this information in the record.

....

It is beyond the scope of this EA to address the validity and/or perceived deficiencies of the Field Office's Lands with Wilderness Characteristics Inventory.

See, e.g., Appendix F, Public Comments and Agency Response, Response to Comment #12. This response completely ignores Manual 6310 direction to maintain an updated inventory and to address new information, such as citizen proposals, when submitted and in the context of a NEPA process that will impact lands with wilderness characteristics. **Updating the BLM's inventory, based both on the new inventory submitted and the information provided as to the flaws in the agency's inventory are absolutely within the scope of evaluating parcels for leasing.**

In addition, the RFO released an initial inventory for public review and comment in April 2014, while the RSFO posted an inventory online in December 2014. For both field offices, TWS provided extensive comments and raised serious concerns about the methodologies and findings of the inventories. Additionally, these comments specifically addressed deficiencies in the inventories with respect to lands containing WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015 summarized below. Accordingly, BLM has also been informed as to the reasons that its current inventories are inaccurate and do not comply with Manual 6310.

- B. The BLM is impermissibly relying on wilderness inventories that do not comply with applicable law and policy.**

The BLM's current wilderness inventories for the RFO and RSFO do not comply with FLPMA or Manual 6310. Consequently, the BLM may not lease WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015, all of which are located in units whose wilderness inventories are deficient. As explained below, among other flaws, those inventories improperly utilized "an overly strict approach to assessing naturalness."

1. Parcel 7 (WY-1511-007) (RFO)

Parcel WY-1511-007 falls within the wilderness inventory unit identified by the RFO as the "Cherokee Creek East Fork" unit (BLM WY-030-12N93W5-2012). In its inventory, BLM found that the Cherokee Creek East Fork unit did not meet the criteria for lands with wilderness characteristics because "primitive routes and range improvements" prevented the unit from meeting the naturalness criterion. However, these claims were not backed up with photographic evidence, route analysis forms or other documentation that might show which routes BLM determined were substantially noticeable. BLM simply assumed that all primitive routes within the unit were substantially noticeable and therefore caused the area to lack "apparent naturalness." BLM also cited "range improvements," including "four man-made reservoirs," as another reason this unit could not be deemed natural in appearance to the casual visitor. As Manual 6310 makes clear, stock ponds, spring developments, fences and other range improvements are "examples of human-made features that may be considered substantially unnoticeable." Manual 6310 at 6. Moreover, in this case, four reservoirs within a 17,000 acre unit are unlikely to affect the naturalness of the area as a whole. BLM's own map for this wilderness inventory unit locates these "reservoirs" along the western periphery of the unit, and each reservoir is less than an acre in size. These features should be considered minor impacts that should not disqualify the naturalness of the unit as a whole; at the very least, they should be cherry-stemmed out of the unit so that the naturalness of the remaining territory can be adequately assessed.

2. Parcel 9 (WY-1511-009) (RFO)

Parcel WY-1511-009 falls within the BLM Rawlins "Willow Creek" wilderness inventory unit (BLM WY-040-14N96W36-2012). In its inventory, BLM determined that the unit did not meet the naturalness criteria because of "numerous oil and gas wells, primitive routes, wilderness inventory roads, and permanent range improvements." This statement directly contradicts the map included in BLM's inventory report. The map shows that the unit contains just a few short wilderness inventory roads and unimproved two-track trails along its periphery, most of which lead to abandoned and shut-in oil and gas wells. Only three wells in the unit are currently producing, and these are all located along the edges of the unit; they could easily have been carved out of the unit boundaries prior to assessing the area's naturalness, yet the BLM made no apparent effort to do so, in spite of direction in Manual 6310 to "[a]void an overly strict approach to assessing naturalness" and, assuming the wells even impact the unit's naturalness, to "[d]efine the area with wilderness characteristics to exclude . . . substantially noticeable human-caused impacts." Manual 6310 at 7, 9. Assuming that the Wilderness Inventory Roads shown on the map actually qualify as roads for wilderness inventory purposes, as defined by Manual 6310, the BLM could still have drawn a boundary for this unit that would have excluded those human impacts while retaining sufficient acreage to justify further assessment of wilderness characteristics under Manual 6310. The boundaries for this unit should be redrawn according to the guidelines of Manual 6310, and the properly defined unit should be reassessed for the presence or absence of wilderness characteristics prior to offering this parcel for lease.

3. Parcel 13 (WY-1511-013) (RFO)

Parcel WY-1511-013 falls within the RFO's "Cyclone Rim North" wilderness inventory unit. BLM also determined that this unit, like the majority of the units inventoried in this field office, did not meet the naturalness criteria because of "numerous oil and gas wells, primitive routes, wilderness inventory roads, and permanent range improvements." That determination is not consistent with Manual 6310 for the following reasons.

First, this unit has only three producing wells, all located along the boundaries of the unit. Second, Manual 6310 is clear that routes determined to be wilderness inventory roads should be excluded from and used as boundaries for wilderness inventory units. Third, range improvements are explicitly cited in Manual 6310 as human-made impacts that may be considered "substantially unnoticeable" when assessing naturalness. However, BLM made no effort to identify which range improvements are substantially noticeable and why could not be carved out from the boundaries of the unit. Finally, BLM cited primitive routes as one of the negative impacts affecting the naturalness of the unit and included a photo of one of the "substantially noticeable" primitive routes. The photo shows a route that may once have been constructed using mechanical means, but is clearly no longer maintained using mechanical means. From almost any distance, an observer would not identify the road as a "substantially noticeable" feature, let alone one that detracts from the 28,500 acre unit as a whole. BLM did not include photos of the other "61.7 miles of primitive routes" it cited in its inventory as impacts to naturalness, but the photograph provided suggests that many of these routes are not constructed or maintained, do not qualify as wilderness inventory roads and have no effect on the naturalness of the large unit as a whole.

4. Parcel 15 (WY-1511-015) (RSFO)

This parcel overlaps with two wilderness inventory units identified by the Rock Springs Field Office—WY040-2011-14 and WY040-2011-002. The existing lands with wilderness characteristics inventories for these units do not meet the standards for LWC inventories as defined by Manual 6310. The Wilderness Society has conducted an updated inventory for this area that meets the standards described by Manual 6310 and results in new boundaries for a qualifying body of contiguous unroaded BLM lands containing the necessary criteria of sufficient size, apparent naturalness, and outstanding opportunities for solitude and primate and unconfined recreation. *See* Attachment 1, Lands with Wilderness Characteristics Recommendations BLM Rock Springs Field Office, Devils Playground: Henry's Fork Hills for extensive details regarding this area's wilderness characteristics. This report constitutes "new information" as defined by Manual 6310 and should be assessed and responded to prior to leasing Parcel 15 (WY-1511-015).

B. In addition to not complying with FLPMA and Manual 6310, the BLM has yet to evaluate the RSO and RSFO's wilderness inventories and information gathered during those inventories through the land use planning process.

As explained above, the BLM must evaluate information gathered during wilderness inventories during the land use planning process. 43 U.S.C. § 1711(a); *see also Or. Natural Desert Ass'n v. BLM*, 625 F.3d 1092, 1122 (9th Cir. 2010). Here, the BLM has not completed such a process for the RSO and RSFO's ongoing wilderness inventories. The RFO released an initial wilderness inventory for public review and comment in April 2014, while the Rock Springs Field Office posted an inventory online in December 2014. Both of those inventories are currently under consideration in ongoing planning processes – the RFO VRM amendment and the RSFO RMP revision. Thus, in neither case

has the BLM had the opportunity to fully evaluate those inventories and develop management, including for oil and gas activity, based on comments and information provided by the public.

In other field offices, including offices in Wyoming, the BLM regularly defers proposed lease parcels where, as here, updated information on wilderness characteristics has not been evaluated through a planning process. For example, the Bighorn Basin District Office, which is currently revising its RMP, deferred several parcels from Wyoming BLM's August 2013 lease sale because they overlapped with the wilderness inventory area.¹ Similarly, in Colorado, the White River Field Office, which recently completed an oil and gas RMP amendment, deferred leasing on over 250,000 acres of potential lands with wilderness characteristics during its land use planning process. At the time, the WRFO had been updating its inventory in response to new inventory information submitted by TWS and Conservation Colorado. As explained by White River:

The WRFO is currently working on a Resource Management Plan Amendment and associated EIS that will address the potential impacts of significant increases in oil and gas development within the field office over the next 20 years. Because oil and gas development would potentially adversely impact lands with wilderness characteristics, decisions will be made on the management of the lands with wilderness characteristics units in the RMPA. According to BLM Manual 6320, considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; and (3) the protection of wilderness characteristics as a priority over other multiple uses. Because the leasing of lands with wilderness characteristics is likely to result in indirect, adverse impacts to this resource value, it is recommended that until a decision is made on the management of these units, the areas where lands with wilderness characteristics units overlap with nominated parcels be deferred, as under Alternative 3, with the exception being the tracts from Alternative 2 listed in the above . . . which can be leased, and mitigated if needed, to result in not impacting lands with wilderness characteristics.²

As required by FLPMA and BLM Manuals 6310 and 6320, prior to offering WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015 for lease, the BLM must consider TWS's comments on its recent wilderness inventories and make management decisions for those areas through a comprehensive NEPA review process that allows for robust public comment and participation. See

¹ BLM, Final EA, August 2013 Lease Parcels, *available at*

<http://www.blm.gov/pgdata/etc/medialib/blm/wy/information/NEPA/og/2013/08aug/ver3.Par.50960.File.dat/V3WRBBEA.pdf> at 4-37.

² BLM, EA for the White River Field Office June 2014 Competitive Oil & Gas Lease Sale at 77, *available at* http://www.blm.gov/pgdata/etc/medialib/blm/co/programs/oil_and_gas/Lease_Sale/2014/may_2013.Par.34116.File.dat/WR_doiblmco11020130099ea_3.12.14_EA_MLP%20format_Master.pdf; see also Draft EA for the White River Field Office May 2013 Competitive Oil & Gas Lease Sale at 9, *available at* http://www.blm.gov/style/medialib/blm/co/information/nepa/white_river_field/fy2013_scoping.Par.70714.File.dat/doiblmco11020120123ea_111312.pdf ("All proposed lease parcels on Federal surface that fall within areas identified as *potentially* containing wilderness character have been deferred until such time that a complete inventory can be conducted and a determination made as to whether or not the areas possess wilderness characteristics.").

Or. Natural Desert Ass'n v. BLM, 625 F.3d 1092, 1122 (9th Cir. 2007) (“The BLM’s management of any lands with wilderness characteristics is likely to be vigorously debated. It is fairly debatable issues of this kind that NEPA was designed to bring out in the open, for analysis and discussion in the service of sound decisionmaking.”).

II. THE BLM FAILED TO COMPLY WITH NEPA.

A. The EA lacks a reasonable range of alternatives.

The BLM has not evaluated a reasonable range of alternatives for protecting the wilderness characteristics of WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015. Under NEPA, the BLM must consider a broad range of alternatives to mitigate environmental impacts. 40 C.F.R. § 1502.14(a); *see also Theodore Roosevelt Conservation P’ship v. Salazar*, 661 F.3d 66, 72-73 (D.C. Cir. 2011) (requiring the BLM to consider a reasonable range of alternatives for oil and gas activity); IM 2010-117 (requiring consideration of “alternatives to the proposed action that may address unresolved resource conflicts.”). Additionally, under current policies, the BLM must fully “consider” wilderness characteristics during planning actions and evaluate a range of measures to protect wilderness characteristics during the leasing process, including measures not contained in existing RMPs. *See* IM 2011-154 at Att. 2; IM 2010-117 at III. E., F.

A “rule of reason” is used to determine if an adequate range of alternatives have been considered; this rule is governed by two guideposts: (1) the agency’s statutory mandates; and (2) the objectives for the project. *New Mexico ex rel. Richardson*, 565 F.3d at 708. Here, there is no doubt that BLM’s legal mandates under FLPMA and NEPA require it to fully consider the protection of wilderness values, and under IM 2010-117, the agency must treat the “protection of other important resources and values” as an equally important objective to leasing.

Yet, in large part because the BLM is relying on wilderness inventories that are not finalized and do not yet adhere to the requirements of FLPMA and Manuals 6310 and 6320, the EA lacks an adequate range of alternatives for WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015. Such alternatives include deferring or, at a minimum, offering those parcels with measures to protect wilderness characteristics, such as NSO stipulations. BLM acknowledges that it can consider measures to protect wilderness characteristics stating “Specific impacts [to lands with wilderness characteristics], and necessary mitigation, would be identified at the APD stage should the parcels be sold and development proposed.” EA, p. 80. However, the BLM did not consider any alternatives to incorporate protective measures into lease stipulations or provide more specific direction for addressing impacts to lands with wilderness characteristics that would govern APDs. Because BLM has not considered those alternatives, it must defer the parcels from the lease sale.

B. The proposed lease sale will improperly limit the range of alternatives for the ongoing planning process in the Rawlins and Rock Springs Field Offices.

The BLM is currently preparing an amendment to the Rawlins RMP to revise VRM classifications for the Rawlins Field Office, based on a current visual resources inventory. The inventory was necessitated because the Rawlins Field Office had not properly updated its inventory when preparing the Rawlins RMP. The Director granted protests regarding VRM Classifications and committed the Rawlins Field Office to completing an inventory and updating the classifications of

visual resources.³ The updated inventory, completed in February 2011, found that much of the area around the Adobe Town WSA, which includes parcels -007 and -009, remains relatively pristine and undeveloped and therefore qualifies for VRM Class II management.⁴

The management objective for VRM Class II areas "is to retain the existing character of the landscape" and any "level of change to the characteristic landscape should be low." BLM Manual H-8410-1 at V.B.2. However, by intensively leasing these lands under their current VRM classification (Class III), the BLM is ignoring new information and foreclosing opportunities to manage these areas to protect their visual resources. By essentially locking in the current VRM Class III classification and predetermining the outcome of the VRM process, the BLM is in violation of NEPA, which provides that:

(a) Until an agency issues a record of decision as provided in Sec. 1505.2 (except as provided in paragraph (c) of this section), *no action concerning the proposal shall be taken which would:*

1. Have an adverse environmental impact; or
2. *Limit the choice of reasonable alternatives.*

....

(c) While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment unless such action:

- (1) Is justified independently of the program;
- (2) Is itself accompanied by an adequate environmental impact statement; and
- (3) *Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.*

40 C.F.R. § 1506.1 (emphases added). While the agency has discretion in determining where this standard applies, there is no question in this context that leasing parcels that may possess wilderness characteristics will limit the choice of alternatives and prejudice the ultimate decision in the ongoing VRM Amendment to the Rawlins RMP.

C. The EA does not take a "hard look" at wilderness values affected by the lease sale and has failed to address significant new information, which also affects the development of a baseline for environmental analysis.

The BLM also violated NEPA because the EA does not adequately consider the environmental consequences of its proposed actions on wilderness quality lands. NEPA requires that the BLM take a "hard look" at the effects of its proposed actions on wilderness resources. *See* 42 USC §4332(2)(C); *Or. Natural Desert Ass'n v. BLM*, 625 F.3d 1092, 1112 (9th Cir. 2010) (stating that wilderness characteristics are among the values" that the BLM "needs to address in [its] NEPA

³ Director's Protest Resolution Report for Rawlins RMP, p. 140, available at: http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/wyoming.Par.464.96.File.pdf/Rawlins_Directors_Protest_Resolution_Report_12.24.08.pdf.

⁴ To be clear, the BLM has an obligation under the terms of the negotiated settlement for the Rawlins RMP to consider expanding VRM Class I management beyond the Adobe Town WSA. The findings of the visual resources inventory in no way limit that obligation.

analysis"). In order to do so, the agency must rely on "accurate and complete" wilderness information. See *Or. Natural Desert Ass'n v. Shuford*, 2007 WL 1695162 at *11 (D. Ore. 2007). New information from the public that contradicts or calls into question the findings of prior wilderness inventories provides **"a textbook example of significant new information about the affected environment" that the BLM is required to evaluate.** See *S. Utah Wilderness Alliance (SUWA) v. Norton*, 457 F. Supp. 2d 1253, 1264 (D. Utah 2006) (emphasis added). Thus, the BLM's determination that considering such information is "beyond the scope of this document" is clearly at odds with the "hard look" requirement of NEPA.

Courts have frequently held that BLM violated the hard look requirement of NEPA for project-level decisions where the agency disregarded substantive wilderness information provided by the public. In *Or. Natural Desert Ass'n v. Rasmussen*, 451 F. Supp. 2d 1202, 1211-3 (D. Ore. 2006), for example, BLM violated the hard-look requirement when the agency applied an outdated inventory and declined to fully consider new information on wilderness values submitted by the public. *Id.* at p. 1213 ("With a broad brush, BLM dismissed ONDA's inventory..."). In a similar case, an oil and gas lease sale was set aside when the BLM ignored significant new information concerning wilderness characteristics that had been identified by the public. *SUWA v. Norton*, 457 Supp. 2d at 1263-65, ("...Utah BLM ignored significant new information...[I]nformation provided by the Southern Utah Wilderness Alliance...presented a textbook example of significant new information about the affected environment (the wilderness attributes and characteristics...)"). In addition, agency decisions based on inaccurate or incomplete inventories of other, non-wilderness resources have also been overturned under the hard look mandate. See, e.g., *Center for Biological Diversity v. BLM*, 422 F. Supp. 2d 1115, 1166-67 (N.D. Cal. 2006) ("...the problem here is not that BLM did not update the inventory data so that it was exhaustive and current; to the contrary, the problem lies with the fact that, despite extensive evidence in the record indicating the existence of numerous other species..., the BLM nevertheless approved the RAMP which does not take these species into consideration...").

Other decisions confirm that BLM must consider new information provided by the public in order to satisfy its hard look mandate for wilderness values. In *Or. Natural Desert Ass'n v. Shuford*, 2007 WL 1695162 at *11 (D. Ore. 2007), for example, the court distinguished *Rasmussen* and struck down a NEPA challenge brought under the hard look mandate where "unlike *Rasmussen*, the record show[ed] that BLM evaluated [the public's] proposed" wilderness lands. In a similar case, the BLM was found to have taken a sufficiently hard look at the effect of its project-level decision on wilderness values where the agency "updated and maintained its inventory of lands...containing wilderness characteristics by analyzing [the] citizen inventory [at issue], as well as other relevant and new information on the presence or absence of wilderness characteristics outside of existing WSAs." See *Or. Natural Desert Ass'n*, 173 IBLA 348, 352 (2008); *id.* at 355 ("In [*Shuford*], ONDA challenged a BLM decision for failing to address wilderness values...The court upheld BLM's methodology under NEPA and FLPMA in that case, and it distinguished *Rasmussen* on its facts, finding in the record that BLM had evaluated existing information and information submitted by ONDA relating to wilderness values. The wilderness evaluation process described by the court in *Shuford* is similar to that undertaken by the BLM in this case.") (citations omitted).

Biodiversity Conservation Alliance, 183 IBLA 97, 2013 IBLA Lexis *1(2013) is also illustrative. In that case, a citizens group challenged an oil and gas lease sale based in part on a claim that the "BLM failed to adequately consider the likely effects of oil and gas leasing and development on wilderness characteristics" within several parcels proposed for sale. *Id.* at *37. Prior to the lease sale, the BLM had screened the parcels at issue to determine whether they contained wilderness characteristics. *Id.* at *6. Additionally, the BLM had "specifically evaluated the citizens' wilderness proposals" before

the lease sale, making the agency's decision on those proposals "administratively final."⁵ *Id.* at *28-29. Because the BLM had previously considered and completed its review of public inventories regarding the wilderness characteristics at hand, the IBLA concluded that the agency was not required to reconsider the effects of oil and gas leasing and development on the parcels in questions. *Id.* at *28-29, ("In this case, BLM specifically evaluated citizens' wilderness proposals...BLM's citizens proposals decisions have...become administratively final..."),*41 ("We have long held that BLM is not required to consider the likely effects of oil and gas leasing and development on wilderness characteristics or the overall suitability of the affected lands for wilderness characteristics, or regard such impacts as significant, *when BLM has previously determined, with administrative finality*, that the area of public lands at issue does not qualify for wilderness designation.") (emphasis added).

Here, the BLM has not taken the requisite "hard look" required by NEPA. As in *Rasmussen*, the BLM has disregarded substantive new information on wilderness values that would be affected by the lease sale. As discussed previously, TWS submitted extensive comments on the most recent inventories prepared for the RFO and RSFO. In addition, TWS identified significant wilderness values that would be affected by the proposed lease sale but were not recognized or accounted for in the EA. In response, the BLM stated that it was "beyond the scope of [the] EA to address the perceived validity and/or perceived deficiencies of the Field Office's Lands with Wilderness Characteristics Inventory." See Appendix F at Comment #12 of Lease Sale EA. And, even though TWS provided both new inventories and analysis of existing inventories, Appendix D of the Final Lease Sale EA does not list any of the protested parcels among those identified as "In Citizen Proposed Wilderness Areas." That is, the BLM has neither "specifically evaluated" wilderness inventories submitted by TWS and others nor otherwise addressed public comments on its findings on wilderness qualities. See *Biodiversity Conservation Alliance*, 183 IBLA 97, 2013 IBLA Lexis *1, *28-29 (2013).

Instead, the BLM wholly ignored significant new information related to wilderness values that would be affected by the lease sale, claiming that considering such information is "beyond the scope" of the environmental review process for this lease sale. More specifically, with respect to WY-1511-007, WY-1511-009 and WY-1511-013, BLM disregarded new evidence and information concerning the wilderness qualities of previously inventoried units containing the lease parcels. In addition, with respect to WY-1511-015, TWS provided significant new information in the form of identifying an area containing wilderness characteristics that BLM had not previously inventoried. See *SUWA v. Norton*, 457 F. Supp. 2d 1253, 1263-65 (D. Utah 2006).⁶ Although the BLM is not

⁵ The IBLA's concept of "administrative finality" as applied to wilderness inventories appears to be at odds with the plain language of FLPMA and applicable case law. In FLPMA, the duty to inventory "public lands and their resource and other values" is "continuous" and "shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values." 43 U.S.C. § 1711(a). The duty to continuously inventory public lands for wilderness characteristics so as to ensure that wilderness inventories reflect on-the-ground conditions and are consistent with current policies is reinforced by Manual 6310. See Manual 6310.04 at C. (including the need to "conduct[] and maintain[] the wilderness characteristics inventory on a continuing basis" is the list of responsibilities for district and field managers (emphasis added)). Furthermore, the body of case law addressing this issue confirms that the duty to maintain wilderness inventories is continuous and is not limited by notions "administrative finality." See, e.g., *Or. Natural Desert Ass'n v. Rasmussen*, 451 F. Supp. 2d 1202, 1211-3 (D. Ore. 2006); *SUWA v. Norton*, 457 F. Supp. 2d 1253, 1263-65 (D. Utah 2006).

⁶ See also Manual 6310 at § .06.B.1-2 (Documentation and Minimum Standards for Review of New Information, Evaluation of New Information) ("When new information regarding wilderness characteristics meets the minimum standard for further review...[t]he BLM will compare existing data with the submitted

obligated to agree with any public assessment of the wilderness values affected by the lease sale, NEPA requires that the agency take a hard look at a complete and accurate inventory of wilderness values in the planning area. The BLM cannot be said to have taken the requisite hard look where, as here, the agency ignored both significant new information as well as substantive criticism of existing information regarding wilderness values that would be affected by the lease sale.

Further, because the agency has not updated its inventory of lands with wilderness characteristics, the EA's analysis of environmental consequences is compromised by the lack of an accurate understanding of baseline conditions. As the Ninth Circuit has stated: "without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." *Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988), The court further held that "[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process." *Ibid.* See also, BLM's NEPA Handbook, H-1790-1, Section 6.7.1. The EA prepared to support the BLM's leasing decisions does not comply with NEPA's requirement to establish baseline conditions and is impermissibly flawed as a result.

III. Conclusion

For the foregoing reasons, the BLM must defer WY-1511-007, WY 1511-009, WY-1511-013, and WY-1511-015 from the High Desert District Office's November 2015 oil and gas lease sale. Furthermore, the BLM should not reconsider or offer those parcels for lease until the Rawlins and Rock Springs field offices have completed inventory and management decisions for lands with wilderness characteristics through a public planning process.

Please let me know if you have any questions concerning our comments. I would be happy to speak with you at any time. And thank you again for the opportunity to comment.

Sincerely,



Soren Jespersen, Planning & Policy Representative
The Wilderness Society
529 Yampa Ave.
Craig, CO 81625
(970) 819-7377
soren_jespersen@tws.org

Attachment 1 – Lands with Wilderness Characteristics Recommendation: BLM Rock Springs Field Office, Devil's Playground: Henry's Fork Hills

Attachment 2—Map, Nov 2015 Lease Sale EA Devil's Playground: Henry's Fork Hills, Rock Springs Field Office.

information, determine if the conclusion reached in previous BLM inventories remains valid, determine whether the area qualifies as lands with wilderness characteristics, and document its findings.").

Lands with Wilderness Characteristics Recommendation:
BLM Rock Springs Field Office
Devil's Playground: Henrys Fork Hills



Henry's Fork Hills LWC unit, Rock Springs Field Office

P

Photo: Soren Jespersen

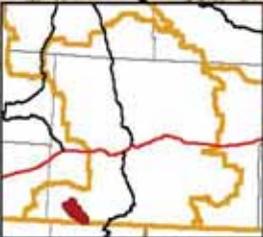
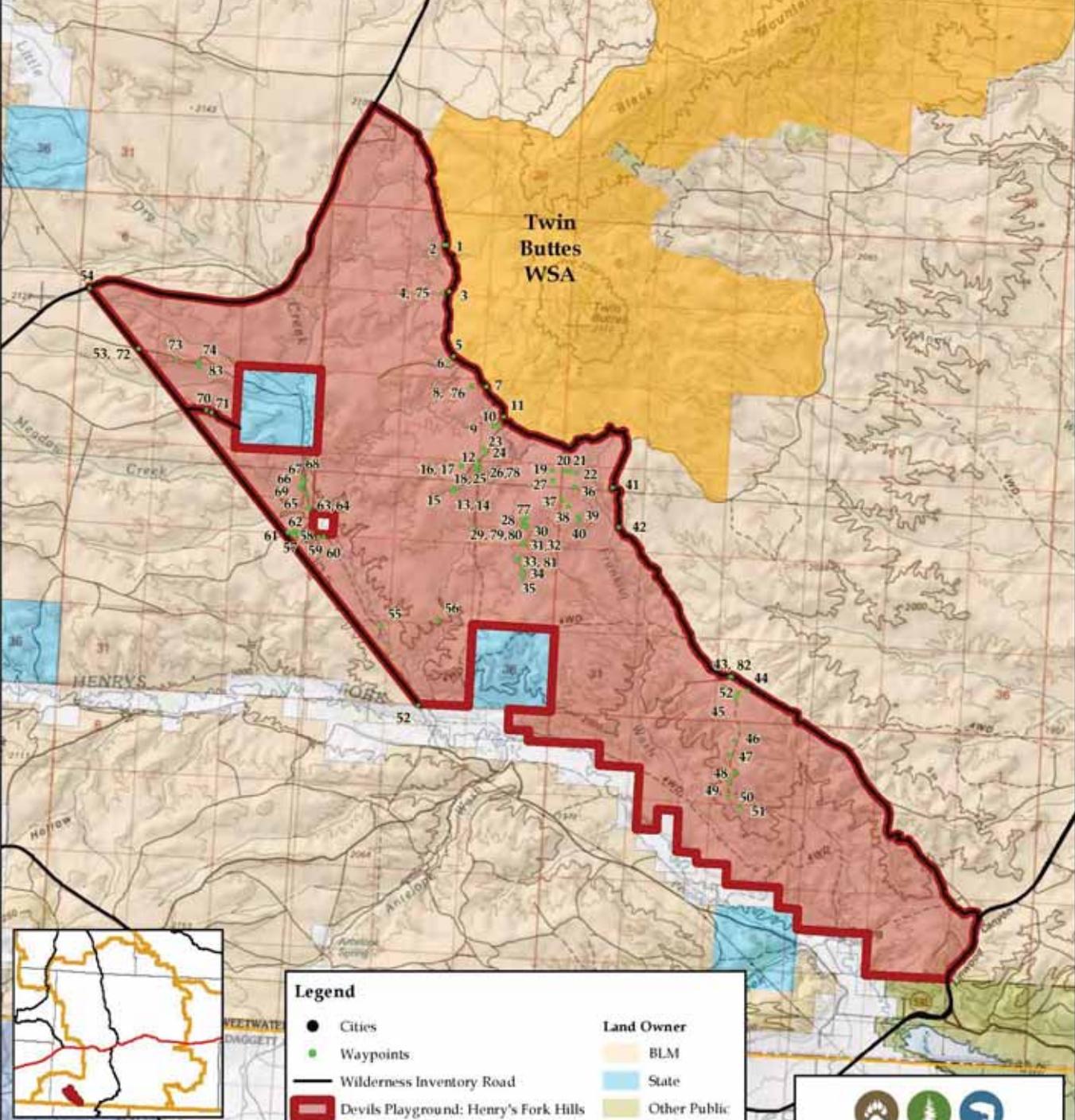
The purpose of this report is to present new information documenting that the area in question meets the criteria laid out in BLM Manual 6310 as Lands with Wilderness Characteristics (LWC). The substantial differences between BLM's existing LWC inventories for this area and our findings are presented throughout this narrative and in the attached photosheet. This information meets the criteria laid out in Manual 6310 as the "Minimum Standard for Review of New Information" and thus should be treated as "new information" and evaluated accordingly.

Devil's Playground: Henry's Fork Hills Rock Springs FO



Devil's
Playground
WSA

Twin
Buttes
WSA



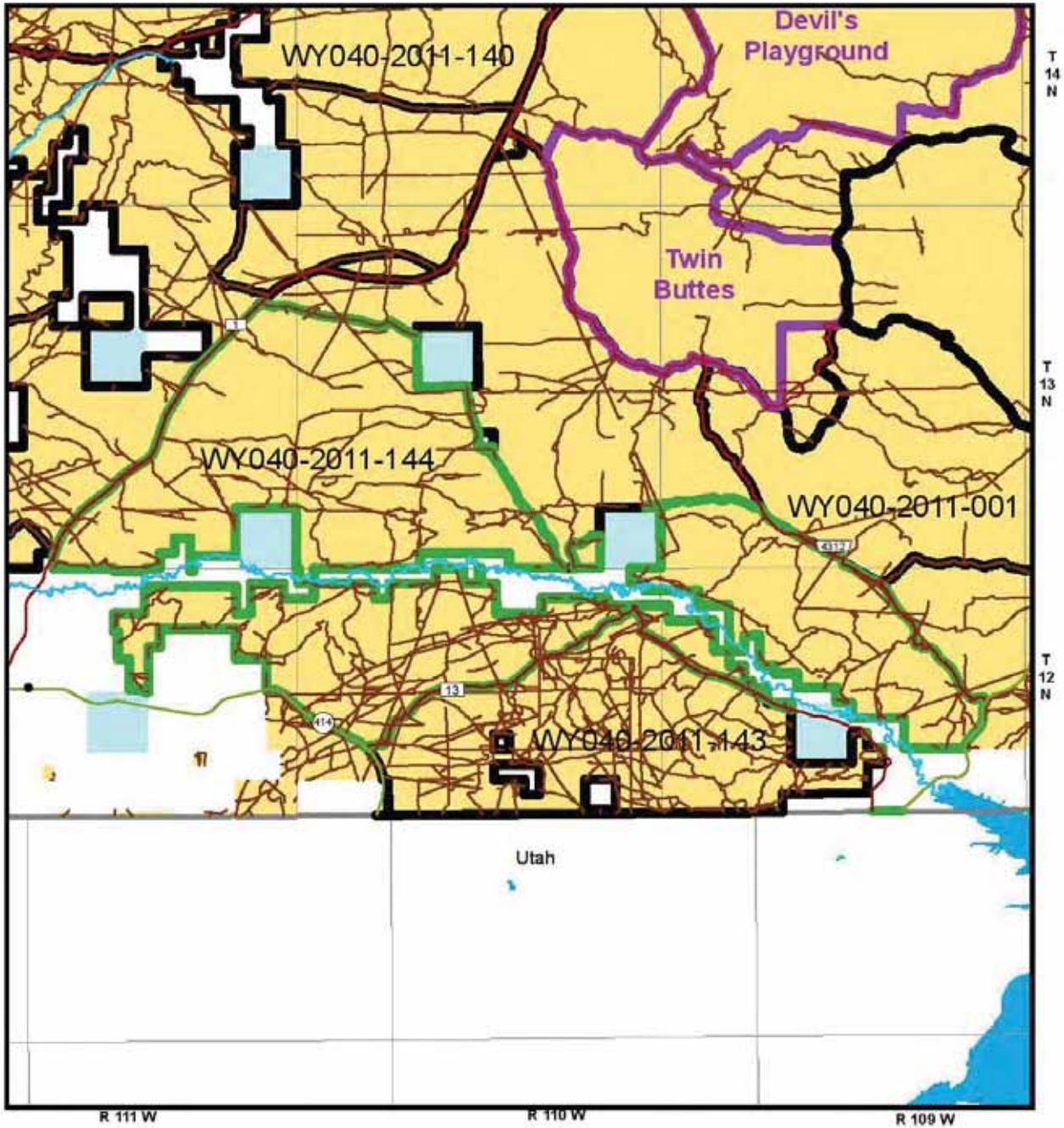
Data Sources: BLM, esri, SBCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 5/20/2013 15-068 v1a

Legend	
●	Cities
●	Waypoints
—	Wilderness Inventory Road
■	Devil's Playground: Henry's Fork Hills
■	Devil's Playground/Twin Buttes WSAs
■	BLM Field Office Boundary
Land Owner	
■	BLM
■	State
■	Other Public
■	Private/Tribe



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Inventory of Lands with Wilderness Characteristics

- Identified Routes
- Wilderness Study Area
- BLM Wild Lands Inventory Boundary
- Other BLM Wild Lands Inventories
- Bureau of Land Management
- Private
- State



No warranty is made by the Bureau of Land Management for use of the data for purposes not intended by BLM

Overview and Boundary Delineation:

The Devil's Playground: Henrys Fork Hills Unit (Henrys Fork Hills) is a 19,100-acre proposed Lands with Wilderness Characteristics (LWC) unit located just south of the Twin Buttes and Devils Playground Wilderness Study Areas in the BLM Rock Springs Field Office just north of Manila, Utah and west of Flaming Gorge National Recreation Area. The unit is bounded on the north by BLM Road 4312 and Sweetwater County Road 1 (McKinnon Road), on the west by an existing transmission line, on the south by private lands along the Henrys Fork River, and on the east by BLM Road 4312. The Henrys Fork Hills Unit is comprised of nearly 20,000 acres of draws, washes, rolling hills, sagebrush flats, and scattered juniper. The unit includes the wild Franklin Wash and the densely vegetated Dry Creek. Views from the unit include Flaming Gorge and Little Mountain to the east, the eastern portion of the High Uintas Wilderness to the south, and Cedar Mountain to the west. The unit is home to sizeable herds of pronghorn, and also provides habitat for greater sage-grouse, elk, and winter habitat for mule deer along the Henrys Fork River. Outstanding opportunities for solitude are easily found in the lightly visited unit. According to the BLM, this area was continuously occupied by Native Americans for around 9,000 years, because of this fact the unit is a regionally significant location for cultural artifacts; chert flakes, tools, and other artifacts along with numerous tipi sites are located throughout the unit, particularly in the northern reaches near Twin Buttes. These cultural resources are an important supplemental value of the unit and provide outstanding opportunities for visitors to experience cultural resources in a primitive, undeveloped backcountry setting.

The BLM's Rock Springs Field Office (RSFO) updated lands with wilderness characteristics inventory (released in December 2014) includes inventory information for one unit—BLM040-2011-144—that overlaps with the Henrys Fork Hills unit. Another BLM unit—BLM040-2011-002—also appears on BLM's LWC inventory GIS dataset, but no corresponding inventory report, map, or other information is currently released to the public on the BLM Rock Springs Field Office Lands with Wilderness Characteristics Inventory webpage¹.

BLM's boundaries for the two units included on its LWC inventory maps of this area do not meet the criteria for boundary delineation as defined by Manual 6310. These boundaries are drawn along primitive routes that do not meet the criteria for wilderness inventory roads, along section lines and other features which do not exist on the ground, and include human impacts such as wilderness inventory roads and a transmission line that should be cut out from the unit prior to assessing the area's size and naturalness characteristics. Instead, BLM has disqualified these units for lack of meeting the size criteria, seemingly without making any attempt to identify the true qualifying acreage as defined by current BLM policies and detailed in Manual 6310.

During the summer of 2014 and spring of 2015, The Wilderness Society visited the Henrys Fork Hills area to conduct an in-depth, on-the-ground field inventory of the potential LWC unit. Our goal was to field check the boundaries for this unit as defined by BLM, to make any necessary adjustments to those boundaries to better meet the guidance for LWC boundary delineation outlined in BLM Manual 6310, and to assess and document any wilderness characteristics found within the true qualifying parcel of contiguous unroaded BLM lands.

BLM Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads" but can also be based on property lines between different types of land ownership or on developed rights of way (Manual 6310 at .06(C)(1)). Only after the true boundaries of the contiguous roadless parcel are identified can an accurate and thorough assessment of that unit's wilderness characteristics be made.

¹ http://www.blm.gov/wy/st/en/field_offices/Rock_Springs/LWCI.html (last viewed on May 22, 2015)

In this particular case, TWS found that BLM's boundaries for the unit do not meet the boundary delineation criteria outlined in Manual 6310. For example, BLM draws the eastern boundary of BLM WY040-2011-144 (BLM Unit 144) and the western boundary of WY040-2011-002 (BLM Unit 002) to follow Dry Creek from the private lands in the south to the Wyoming State Trust lands in the north. This boundary mostly follows no on-the-ground linear feature whatsoever (Photos 63-69). The BLM's northern boundary for the eastern arm of BLM Unit 144 (which also acts as the southern boundary of BLM Unit 002) similarly follows no on-the-ground linear feature whatsoever north² (Photo 43). These boundaries should be deleted and corrected to match up with guidance found in Manual 6310 for boundary delineation of wilderness inventory units.

BLM disqualifies BLM Unit 144 because, "the unit is crossed by numerous improved two-track routes and other routes and does not meet the size criteria". No further description is provided detailing where these "improved two-track routes" exist on the ground, whether or not they qualify as wilderness inventory roads according to Manual 6310, or whether or not they can be excluded from the boundaries of the unit while still retaining a unit of sufficient size to warrant further investigation for the wilderness characteristics of naturalness and outstanding opportunities for solitude or primitive and unconfined recreation.

Our inventory of the area, conducted in 2014 and 2015, shows that the vast majority of these two-track routes cited by BLM either do not exist on the ground, are unimproved, or otherwise do not meet the criteria for wilderness inventory roads as defined by Manual 6310. Our findings are described in details below and in the attached photosheet and maps.

Discussion of Wilderness Characteristics including Boundary Adjustments:

1. Henrys Fork Hills proposed Lands with Wilderness Characteristics meets the minimum size criterion for roadless lands and is primarily affected by the forces of nature.

The Henrys Fork Hills Unit comprises a block of 19,100 contiguous roadless acres. BLM's Manual 6310 states that a "way" maintained solely by the passage of vehicles does not constitute a "road" for purposes of inventorying for wilderness characteristics (Wilderness Inventory Road). Further, the fact that a "way" is used on a regular and continuous basis does not make it a road. A vehicle route that was constructed by mechanical means *but is no longer being maintained by mechanical methods* is *not* a road. A Wilderness Inventory Road (WIR), by comparison, is a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use" (Manual 6310 at .07).

BLM disqualifies BLM Unit 144 for lack of meeting this size criterion, despite defining the inventory area as nearly 28,700 acres in size. As show in the attached map and photosheet, the majority of the "numerous improved two-track routes and other routes" that the BLM cites to disqualify this unit are either located outside of the true qualifying boundaries of the unit, exist only on maps but are no longer visible on-the-ground, or simply do not meet the criteria for wilderness inventory roads as defined by Manual 6310. Boundaries for potential wilderness characteristics units should be drawn "to exclude wilderness inventory roads and other substantially noticeable human-caused impacts," as stated in Manual 6310, including developed rights-of-ways such as those associated with transmission lines; any assessment of wilderness characteristics within the unit should not be conducted until proper qualifying boundaries are identified.

² See BLM map above. No map is included for BLM Unit 002 in this report as BLM has not yet released information on that unit. No GIS data for any of the BLM's Lands with Wilderness Characteristics units has been released to the public as of May 2015, despite repeated requests.

Once wilderness inventory roads and other substantially noticeable human impacts are excluded from the boundaries of this wilderness inventory unit, the unit contains 19,100 acres of contiguous roadless BLM lands and thus meets the size criterion for lands with wilderness characteristics. The unit's numerous draws and rolling hills provide screening from outside sights and sounds. The healthy sagebrush, scattered pinyon and juniper woodlands, and eroded badlands are entirely natural in appearance to the casual visitor (photos 2, 4, 8, 25, 26, 76, 77, 78, 83 and 84). The human impacts present in the unit, including remnant ways and unmaintained routes, are relatively minor human impacts that have little to no impact on the naturalness of the large unit as a whole. The casual visitor would undoubtedly recognize the area as one that is primarily affected by the forces of nature.

II. Henrys Fork Hills proposed LWC provides outstanding opportunities for solitude and primitive and unconfined recreation.

It is not difficult to find outstanding solitude within the Henrys Fork Hills Unit. One can walk for less than ten minutes down into any of the numerous draws leading off of the flanks of Twin Buttes and experience complete isolation. In fact, this area is so lightly visited, that anybody traveling along the two-track routes that act as boundaries for this unit (such as BLM4312) will likely experience solitude. Compared to the relatively busy public lands surrounding the nearby Green River, Ashley National Forest, and Flaming Gorge National Recreation Area, the Henrys Fork Hills unit provides an exemplary solitude experience.

During the winter months, the Henrys Fork Hills unit is still accessible because of surrounding County Roads and State Highways. Visiting this area in winter is a truly wild experience and can only be described as outstanding.

Although the Henrys Fork Hills unit is not technically contiguous with the Twin Buttes Wilderness Study Area, the two units share a boundary—BLM 4312 which is a sometimes-rough dirt road traversing the southern boundary of the WSA. These two units are similar in size (Twin Buttes WSA is 22,500 acres and the Henrys Fork Hills unit is 19,100 acres). The units share many similar qualities, including the outstanding opportunities for solitude. BLM describes Twin Buttes WSA as containing “ample opportunities for solitude” despite the fact that it is nearly entirely circumscribed by primitive routes. The Henrys Fork Hills unit may in fact have more outstanding opportunities for solitude than the existing WSA. Because of private lands along the entire southern boundary, access is limited from that direction; anybody who ventures into the unit on this southern end will undoubtedly not encounter another person.

While the opportunities for solitude in this unit are its most striking feature, outstanding opportunities for primitive recreation also exist. The area is replete with pronghorn. Mule deer and elk were also documented within the unit, along with wild horses and greater sage-grouse. Wildlife viewing and hunting in a backcountry setting are primitive recreational activities that are outstanding in this unit. Also, because of the rich collections of cultural artifacts, including chert arrowheads, spear points, tools along with tipi rings, the area contains outstanding opportunities to experience these amazing cultural resources in a backcountry setting or even to discover new important cultural sites. Because of the mild terrain and nature of the soil and topography, this area provides excellent walking. One can travel for long distances across many washes and hills enjoying the outstanding views and quiet landscape. During several such hikes, we were able to observe scenes where raptors soared in the sky above pronghorn, elk, and wild horses, all in the same field of view. As part of a larger Devils Playground region containing several lands with wilderness characteristics units, the Twin Buttes and Devils Playground WSAs, and the Pine Springs Area of Critical Environmental Concern, the Henrys Fork Hills LWC unit is an important location for those seeking solitude and primitive recreational opportunities in the Flaming Gorge area.

Summary Conclusion

Our extensive on-the-ground inventory of the Henrys Fork Hills proposed LWC shows that BLM's determination that the unit does not qualify as lands with wilderness characteristics is both incorrect and unsubstantiated. The area's 19,100 roadless acres are largely natural in appearance and contain outstanding opportunities for solitude and primitive recreation.

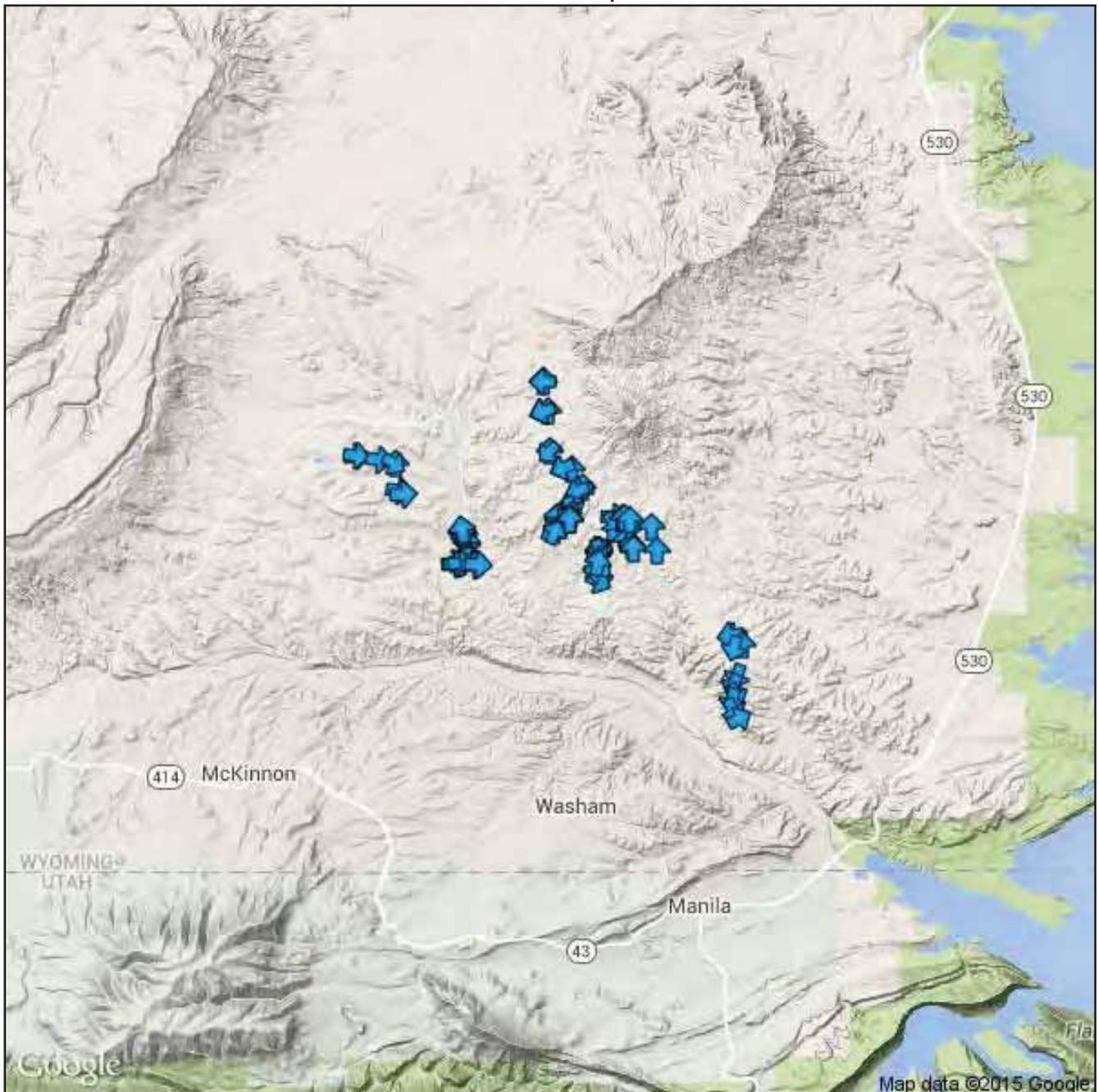
This overview provides new information, including maps and photos, documenting that the 19,100-acre Henrys Fork Hills Unit meets the criteria outlined in Manual 6310 for identifying lands with wilderness characteristics. This area deserves to be recognized as Lands with Wilderness Characteristics and its wilderness values protected.

Devil's Playground: Henrys Fork Hills

(BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available. Comments on individual routes and human impacts are included above each photo.

Overview Map



Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	01 - IMG_0456.JPG
Latitude	N 41° 08.27'
Longitude	W 109° 46.93'
Elevation	6899 ft
Photo Direction	270° W

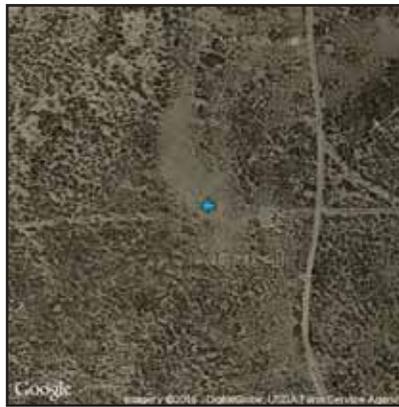
01 - BLM's route inventory data that was used to inform the LWC inventory includes numerous routes that either do not qualify as wilderness inventory roads (WIR) according to Manual 6310. BLM's inventories often cite these routes as impacts to naturalness to determine that the unit does not contain wilderness characteristics. Photos 01 and 02 are just one example; many more similar "routes" are illustrated below and described in the attached narrative.



Title:

Attributes	
File Name	02 - IMG_0457.JPG
Latitude	N 41° 08.27'
Longitude	W 109° 46.96'
Elevation	6900 ft
Photo Direction	270° W

02 - Although this route appears on BLM Rock Springs' route inventory, and is even slightly visible on aerial imagery, it does not exist on the ground. This route was likely never constructed and is certainly not maintained or even traveled. This route should be deleted from the route network and does not qualify as a WIR.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	03 - IMG_0458.JPG
Latitude	N 41° 07.78'
Longitude	W 109° 46.85'
Elevation	6906 ft
Photo Direction	240° WSW

03 - Several routes are shown on BLM maps as spur routes coming off of the maintained BLM 4312 road that traverses around the west and south sides of the Twin Buttes WSA. The majority of these routes, such as the one below, are clearly not maintained and do not qualify as roads for wilderness inventory purposes.



Title:

Attributes	
File Name	04.JPG
Latitude	N 41° 07.76'
Longitude	W 109° 46.95'
Elevation	6941 ft
Photo Direction	252° WSW

04 - The Henrys Fork Hills unit is entirely natural in appearance. While several antiquated and unmaintained routes run into the unit, these routes do not qualify as wilderness inventory roads and do not affect the naturalness of the unit as a whole. The unit has outstanding views towards the Henrys Fork River and the Uinta Mountains.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	05.JPG
Latitude	N 41° 07.09'
Longitude	W 109° 46.74'
Elevation	6957 ft
Photo Direction	180° S

05 – Another user created route in the Henrys Fork Hills unit.



Title:

Attributes

File Name	06.JPG
Latitude	N 41° 07.04'
Longitude	W 109° 46.80'
Elevation	6929 ft
Photo Direction	225° SW

06 – Several user created routes in this unit terminate after only a short distance.

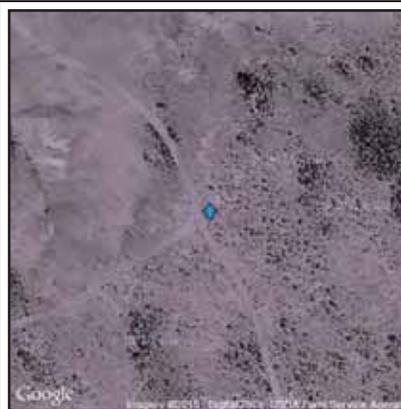


Title:

Attributes

File Name	07.JPG
Latitude	N 41° 06.80'
Longitude	W 109° 46.27'
Elevation	7101 ft
Photo Direction	WSW

07 – BLM's route data includes numerous errors. For example, BLM's route data shows a route heading in a straight line west about a ¼ mile south of this location. However, no route exists along that line. Instead, this faint and winding route heads west from BLM 4312. This route was never constructed or maintained and has no impact on the naturalness of the unit.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	08.JPG
Latitude	N 41° 06.79'
Longitude	W 109° 46.48'
Elevation	7085 ft
Photo Direction	248° WSW

08 – Numerous small drainages extend south and west off of Twin Buttes. These areas rarely see foot or horse travelers, and as such provide outstanding opportunities for solitude.



Title:

Attributes

File Name	09.JPG
Latitude	N 41° 06.38'
Longitude	W 109° 46.13'
Elevation	6975 ft
Photo Direction	247° WSW

09 – A few old seismic routes are visible through aerial imagery and show up on BLM's maps and route database. However, the casual visitor would likely fail to even notice their presence on the landscape. These routes are entirely overgrown and serve no modern purpose whatsoever.



Title:

Attributes

File Name	10.JPG
Latitude	N 41° 06.40'
Longitude	W 109° 46.07'
Elevation	6975 ft
Photo Direction	260° W

10 – Another view of the seismic route in photo 9. This route is less discernible than the many wildlife trails that traverse throughout the unit and is by no means a substantially noticeable human impact.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	11.JPG
Latitude	N 41° 06.48'
Longitude	W 109° 45.99'
Elevation	6998 ft
Photo Direction	180° S

11 – BLM 4312 on the left and an unmaintained two-track heads SW on the right. This route is unnamed and lightly traveled. It is clearly not maintained. Although visible here, the route quickly deteriorates as seen in the following three photos.

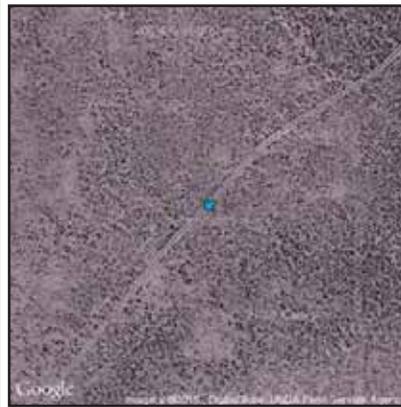


Title:

Attributes

File Name	12.JPG
Latitude	N 41° 06.01'
Longitude	W 109° 46.33'
Elevation	6935 ft
Photo Direction	233° SW

12 – Another view of the route shown in photos 11 through 15. This route is still visible when standing directly atop the two-track, but is clearly unmaintained.



Title:

Attributes

File Name	13.JPG
Latitude	N 41° 05.70'
Longitude	W 109° 46.63'
Elevation	6911 ft
Photo Direction	205° SSW

13 – The unnamed and unmaintained route in photos 11-15 completely disappears atop a small hill here at Waypoint 13. Beyond this point the route is no longer visible on the ground, as seen in this photo looking directly over the mapped path of the route.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	14.JPG
Latitude	N 41° 05.66'
Longitude	W 109° 46.67'
Elevation	6867 ft
Photo Direction	241° WSW

14 – Another view looking SW along the path where BLM maps and database indicate a route travels. This route is invisible on the ground and no signs of construction, maintenance, or ongoing travel can be found.



Title:

Attributes

File Name	15.JPG
Latitude	N 41° 05.70'
Longitude	W 109° 46.63'
Elevation	6895 ft
Photo Direction	24° NNE

15 – looking back up the hill along the path of the BLM route shown in photos 11-15. If this route were ever constructed using mechanical means, this steep hill would show signs of cutting and blading, which it does not.



Title:

Attributes

File Name	16.JPG
Latitude	N 41° 05.95'
Longitude	W 109° 46.55'
Elevation	6925 ft
Photo Direction	WNW

16 – looking WNW along a route that appears on BLM's route database. This route is almost entirely invisible on the ground and does not qualify as a wilderness inventory road.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	17.JPG
Latitude	N 41° 05.94'
Longitude	W 109° 46.55'
Elevation	6925 ft
Photo Direction	260° W

17 – What is likely an old seismic route is visible on aerial imagery. From the ground it is apparent that this route is largely overgrown, out of use, and unmaintained. The sagebrush growing in the median of this route is similar in size to that growing outside of the route.

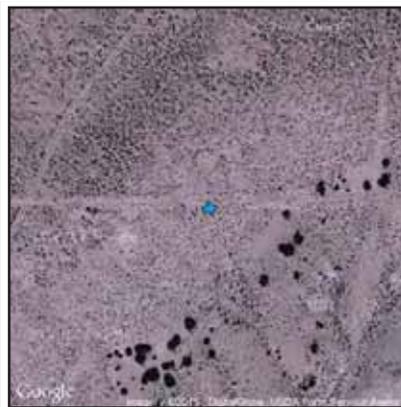


Title:

Attributes

File Name	18.JPG
Latitude	N 41° 05.93'
Longitude	W 109° 46.34'
Elevation	6923 ft
Photo Direction	72° ENE

18 – Looking east along the seismic route shown in photos 17 and 19. This route cuts directly across the steep slopes of a small drainage without following contours of the landscape. The route is impassable to passenger vehicles and does not qualify as a WIR.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	19.JPG
Latitude	N 41° 05.95'
Longitude	W 109° 45.28'
Elevation	6972 ft
Photo Direction	94° E

19 – Some sections of the old seismic route within the unit retain their two-track character. However, this route is clearly unmaintained using mechanical means and serves no current purpose.



Title:

Attributes	
File Name	20.JPG
Latitude	N 41° 05.95'
Longitude	W 109° 45.11'
Elevation	6984 ft
Photo Direction	0° N

20 – There are several two-track routes within a roughly 400 acre area along the flats just south of BLM 4312 in this area. None of these routes are maintained using mechanical means. If it is determined that the cumulative affects of these routes impact the naturalness of this area, these 400 acres can be easily removed from the unit. These routes are at 6900' in elevation and are not visible from the bulk of the unit which is at lower elevations.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	21.JPG
Latitude	N 41° 05.95'
Longitude	W 109° 45.05'
Elevation	6977 ft
Photo Direction	90° E

21 - The seismic route also shown in photos 19 and 22. This route ignores local contours and is not maintained using mechanical means. This route serves no modern purpose and is naturally reclaiming itself.



Title:

Attributes

File Name	22.JPG
Latitude	N 41° 05.94'
Longitude	W 109° 44.95'
Elevation	6947 ft
Photo Direction	0° N

22 - The seismic route shown in photos 19 and 21. This route does not qualify as a wilderness inventory road and has no impact on the naturalness of the unit as a whole. The route is naturally reclaiming itself and is substantially unnoticeable from the vast majority of the unit.



Title:

Attributes

File Name	23.JPG
Latitude	N 41° 06.13'
Longitude	W 109° 46.25'
Elevation	6947 ft
Photo Direction	330° NNW

23 - Another example of a single-use seismic route within the unit. This route appears on aerial imagery and BLM maps, however it is almost entirely overgrown, invisible from the ground, and shows no signs of use.



Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	24.JPG
Latitude	N 41° 06.09'
Longitude	W 109° 46.22'
Elevation	6942 ft
Photo Direction	154° SSE

24 – Another image of the seismic route in photo 23. This route is entirely overgrown and naturally reclaimed.

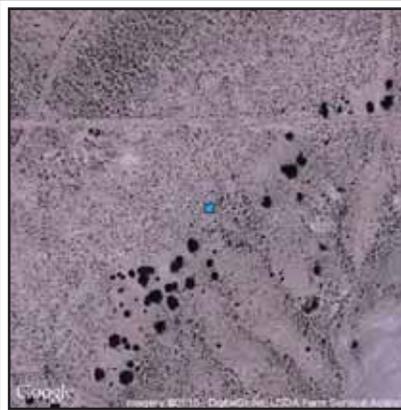


Title:

Attributes

File Name	25.JPG
Latitude	N 41° 05.92'
Longitude	W 109° 46.34'
Elevation	6910 ft
Photo Direction	223° SW

25 – Looking southwest over the much of the lower portion of the unit. From any of the vantage points in the unit one can lookout and see an apparently natural landscape without significant human impacts.

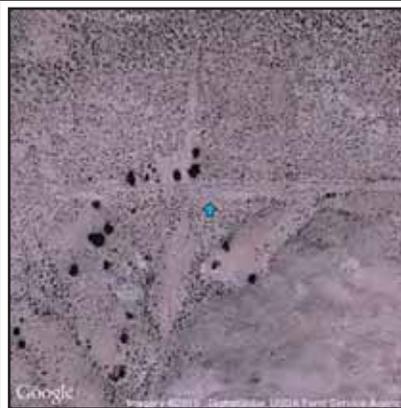


Title:

Attributes

File Name	26.JPG
Latitude	N 41° 05.93'
Longitude	W 109° 46.28'
Elevation	6882 ft
Photo Direction	0° N

26 – Another photo showing the naturalness of the unit and the outstanding opportunities for both solitude and primitive recreation. The hills and draws of the unit offer screening from other visitors. The trailless landscape means that anybody who travels into the actual unit will likely find themselves alone.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	27.JPG
Latitude	N 41° 05.84'
Longitude	W 109° 45.26'
Elevation	6984 ft
Photo Direction	151° SSE

27 – Although many routes show up on aerial imagery and BLM maps and route databases, these routes are not all substantially noticeable wilderness inventory roads. The route in photo 27 has sagebrush in its median that is not discernibly different size than that growing outside of the route. The route is not traveled or maintained.

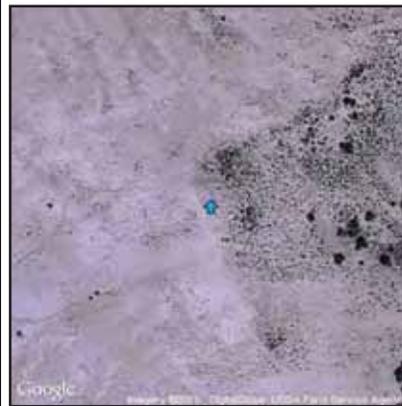


Title:

Attributes

File Name	28.JPG
Latitude	N 41° 05.40'
Longitude	W 109° 45.66'
Elevation	6984 ft
Photo Direction	0° N

28 – BLM maps show a route traveling from north to south across the unit from BLM 4312 in the north to State Lands in the south. This route (photos 28-35) is not a wilderness inventory road and should be left within the unit as an unmaintained way.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	29.JPG
Latitude	N 41° 05.35'
Longitude	W 109° 45.63'
Elevation	6968 ft
Photo Direction	180° S

29 – The north/south route mentioned in photo 28 largely disappears at Waypoint 29. As seen in the photo below, this route shows no sign of original construction, is not maintained, and is not visible from even a short distance away. This photo looks south over the mapped location of the route.

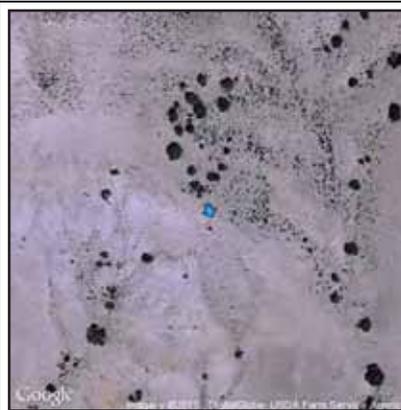


Title:

Attributes

File Name	30.JPG
Latitude	N 41° 05.34'
Longitude	W 109° 45.59'
Elevation	6938 ft
Photo Direction	160° SSE

30 – Another shot of the unnamed primitive route that is mapped as bisecting the unit between BLM 4312 in the north and state lands in the south. This route is clearly unmaintained, lightly traveled, and blends in with the surrounding terrain.

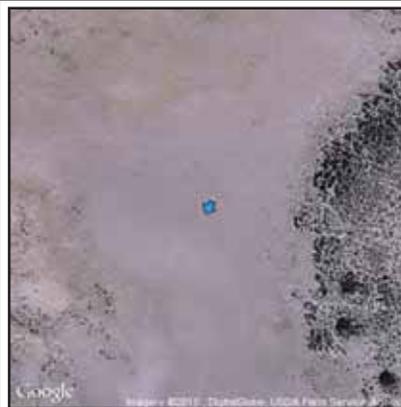


Title:

Attributes

File Name	31.JPG
Latitude	N 41° 05.17'
Longitude	W 109° 45.62'
Elevation	6879 ft
Photo Direction	208° SSW

31 – This route may see a vehicle or two per year and as such is hardly visible even when standing directly atop of the mapped roadbed.



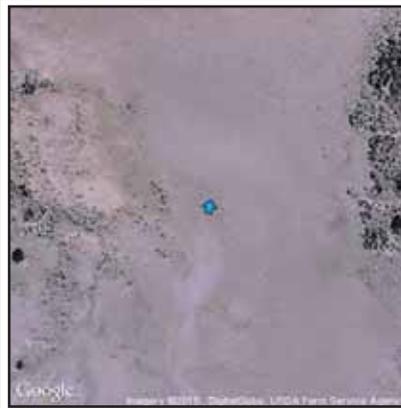
Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	32.JPG
Latitude	N 41° 05.14'
Longitude	W 109° 45.64'
Elevation	6884 ft
Photo Direction	12° NNE

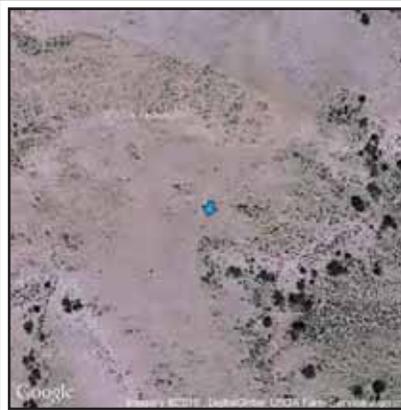
32 – Another view of the route also shown in photos 28 – 35. This route is completely invisible in many locations and travels over soft and sensitive soils.



Title:

Attributes	
File Name	33.JPG
Latitude	N 41° 05.00'
Longitude	W 109° 45.69'
Elevation	6892 ft
Photo Direction	196° SSW

33 – Many primitive routes within the Henrys Fork Hills unit show up on BLM maps, but when visited in person are hardly distinguishable from surrounding terrain.



Title:

Attributes	
File Name	34.JPG
Latitude	N 41° 04.87'
Longitude	W 109° 45.61'
Elevation	6886 ft
Photo Direction	179° S

34 – Looking south along the never-constructed, unmaintained, and rarely traveled primitive route shown in photos 28-35. This route does not qualify as a wilderness inventory road and is substantially unnoticeable.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	35.JPG
Latitude	N 41° 04.80'
Longitude	W 109° 45.61'
Elevation	6900 ft
Photo Direction	117° ESE

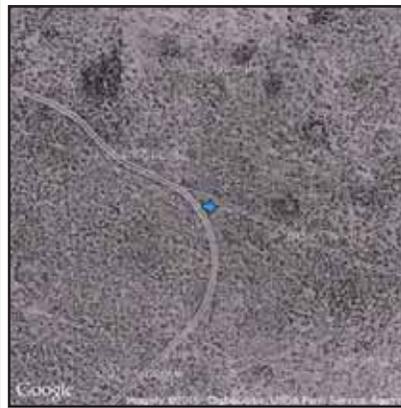
35 – Beyond this point the mapped primitive route is almost completely invisible from the ground. Anybody traveling through the unit would sense nothing unnatural about this location.



Title:

Attributes	
File Name	36.JPG
Latitude	N 41° 05.79'
Longitude	W 109° 44.95'
Elevation	6983 ft
Photo Direction	97° E

36 – A short spur that leading to nowhere at all. Two-tracks like these are rarely traveled and in many places look no different than game trails or hiking paths. These cannot be considered impacts to naturalness.



Title:

Attributes	
File Name	37.JPG
Latitude	N 41° 05.63'
Longitude	W 109° 45.11'
Elevation	6989 ft
Photo Direction	88° E

37 – a two-track route that travels to an overlook above Franklin Wash. Because of the arid climate and sandy soils, these antique two-tracks remain on the surface despite being unmaintained and rarely traveled.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	38.JPG
Latitude	N 41° 05.57'
Longitude	W 109° 45.02'
Elevation	7002 ft
Photo Direction	135° SE

38 – Looking SE. This route is clearly unmaintained.



Title:

Attributes

File Name	39.JPG
Latitude	N 41° 05.48'
Longitude	W 109° 44.90'
Elevation	7008 ft
Photo Direction	0° N

39 – Because of the terrain, soil type, and climate, several old routes within the unit remain visible when standing directly atop of them. However, these routes are isolated and not substantially noticeable throughout the unit. These routes have no impact on the naturalness of the unit as a whole.

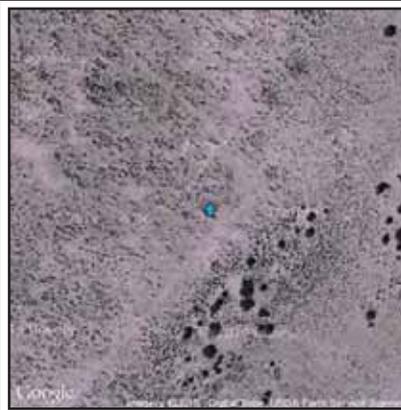


Title:

Attributes

File Name	40.JPG
Latitude	N 41° 05.44'
Longitude	W 109° 44.87'
Elevation	7001 ft
Photo Direction	0° N

40 – The terminus of the route shown in photos 37 – 40. While this route may occasionally be used by antelope hunters or campers seeking a view into the impressive Franklin Wash area within the unit, the route is substantially unnoticeable and is clearly not a wilderness inventory road.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	41.JPG
Latitude	N 41° 05.80'
Longitude	W 109° 44.43'
Elevation	7009 ft
Photo Direction	180° S

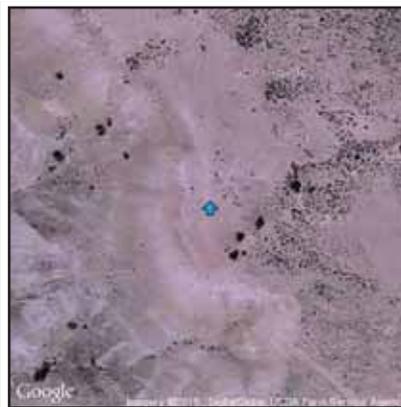
41 – The difference between a substantially noticeable wilderness inventory road (on the left) and a non-constructed and unmaintained primitive route (on the right). The vast majority of these unmaintained and unconstructed primitive routes have no impact on the overall naturalness of the unit as a whole.



Title:

Attributes	
File Name	42.JPG
Latitude	N 41° 05.39'
Longitude	W 109° 44.31'
Elevation	6891 ft
Photo Direction	135° SE

42 – The eastern boundary of the Henrys Fork Hills unit is BLM 4312 as it heads south and east towards its outlet at Highway 530. This route is clearly visible from a long distance as seen in this photo and is one of the primary access routes into the Twin Buttes area.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	43.JPG
Latitude	N 41° 03.87'
Longitude	W 109° 42.61'
Elevation	6784 ft
Photo Direction	266° W

43 – The BLM's mapped boundary for this unit (WY-040-2011-144) departs BLM 4312 and heads west towards a parcel of WY state lands just north of the Henrys Fork. This boundary follows no existing on the ground feature whatsoever. The closest feature is this single-track game trail which clearly doesn't meet the criteria for a WIR and should not be used as a boundary for a wilderness inventory unit.



Title:

Attributes

File Name	44.JPG
Latitude	N 41° 03.74'
Longitude	W 109° 42.39'
Elevation	6795 ft
Photo Direction	0° N

44 – Photos 44 through 51 document a primitive and unmaintained two track route which heads south from BLM 4312 along the rim above the Henrys Fork River. This route starts out as a visible two track that receives some use, however as shown in the following photographs it is neither constructed nor maintained, and does not qualify as a road for wilderness inventory purposes.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	45.JPG
Latitude	N 41° 03.64'
Longitude	W 109° 42.55'
Elevation	6802 ft
Photo Direction	194° SSW

45 – Motorized travel through the sandy soils of this area leaves deep impressions on the surface. Routes such as these may get little travel but are slow to recover.



Title:

Attributes

File Name	46.JPG
Latitude	N 41° 03.20'
Longitude	W 109° 42.53'
Elevation	6804 ft
Photo Direction	200° SSW

46 – Another shot of the sandy and loose soils of this area. This route shows no signs of recent blading and is recovering naturally.

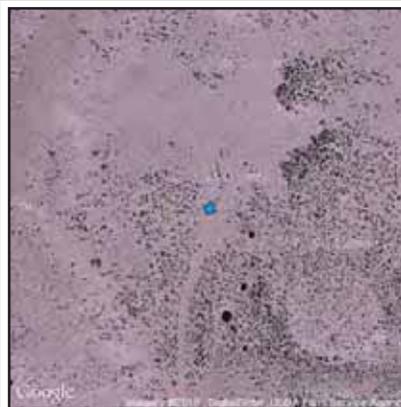


Title:

Attributes

File Name	47.JPG
Latitude	N 41° 03.04'
Longitude	W 109° 42.59'
Elevation	6810 ft
Photo Direction	204° SSW

47 – Grasses growing within the tread and throughout the median of the unmaintained primitive route documented in photos 44-51.



Title:

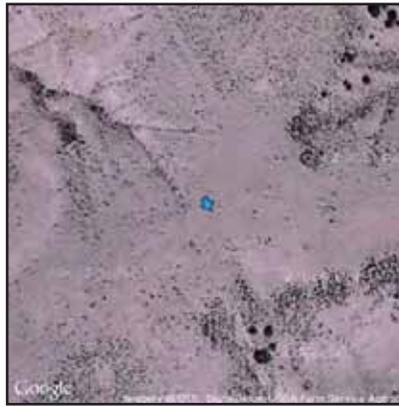
Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	48.JPG
Latitude	N 41° 02.86'
Longitude	W 109° 42.50'
Elevation	6824 ft
Photo Direction	154° SSE

48 – BLM maps show this north/south route cutting through the unit from BLM 4312 to private property along the Henrys Fork River. This route is largely out-of-use, shows no signs of construction using mechanical means, and is barely visible.

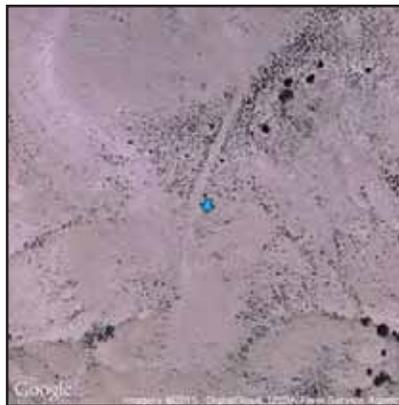


Title:

Attributes

File Name	49.JPG
Latitude	N 41° 02.77'
Longitude	W 109° 42.58'
Elevation	6800 ft
Photo Direction	192° SSW

49 – Another shot of the unconstructed and unmaintained north/south route that appears on BLM maps of this unit. This route shows little sign of ongoing travel and dead-ends at private property. This route is not a wilderness inventory road.

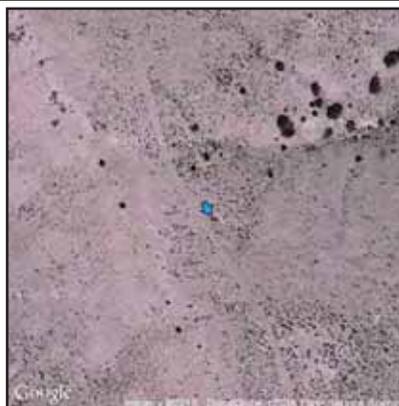


Title:

Attributes

File Name	50.JPG
Latitude	N 41° 02.60'
Longitude	W 109° 42.57'
Elevation	6757 ft
Photo Direction	150° SSE

50 – Another view of the route in photos 44-51. No construction or maintenance. Barely visible.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	51.JPG
Latitude	N 41° 02.49'
Longitude	W 109° 42.41'
Elevation	6699 ft
Photo Direction	61° ENE

51 – As the route bends east before hitting the lowlands around the Henrys Fork River, it became almost entirely invisible to the naked eye.



Title:

Attributes

File Name	53.JPG
Latitude	N 41° 07.00'
Longitude	W 109° 51.16'
Elevation	6928 ft
Photo Direction	82° E

53 – The actual western boundary of the unit is a small transmission line which parallels the west rim of Dry Creek. BLM's boundary for this unit follows Dry Creek to the east, along no qualifying boundary delineation feature.



Title:

Attributes

File Name	57.JPG
Latitude	N 41° 05.12'
Longitude	W 109° 48.86'
Elevation	6635 ft
Photo Direction	88° E

57 – a small 40 acre private land parcel is located along Dry Creek just inside the western boundary of this unit. This route leads under the transmission lines and to the private property. This route is clearly not a road for wilderness inventory purposes, despite likely providing occasional access to the small private inholding.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	58.JPG
Latitude	N 41° 05.12'
Longitude	W 109° 48.78'
Elevation	6633 ft
Photo Direction	93° E

58 – Another view of the route described in photo 57.



Title:

Attributes

File Name	59.JPG
Latitude	N 41° 05.12'
Longitude	W 109° 48.48'
Elevation	6573 ft
Photo Direction	86° E

59 – The route leading to the 40-acre inholding described in photo 57. This route is largely impassable to passenger vehicles and is not a wilderness inventory road.



Title:

Attributes

File Name	60.JPG
Latitude	N 41° 05.11'
Longitude	W 109° 48.41'
Elevation	6565 ft
Photo Direction	94° E

60 – This route is invisible from the ground.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	61.JPG
Latitude	N 41° 05.14'
Longitude	W 109° 48.93'
Elevation	6643 ft
Photo Direction	84° E

61 – This route passes beneath the transmission lines and leads to the small 40-acre inholding along Dry Creek. While initially an unmaintained two-track, the route quickly deteriorates and is impassable and invisible once it enters Dry Creek proper as seen in photos 61-69.



Title:

Attributes

File Name	62.JPG
Latitude	N 41° 05.16'
Longitude	W 109° 48.82'
Elevation	6642 ft
Photo Direction	69° ENE

62 – This route was never constructed using mechanical means.



Title:

Attributes

File Name	63.JPG
Latitude	N 41° 05.40'
Longitude	W 109° 48.64'
Elevation	6567 ft
Photo Direction	34° NE

63 – Deep washes in Dry Creek block further motorized travel. BLM uses this impassable and invisible route as a boundary for their wilderness inventory units WY040-2001-002 and WY040-2011-144. This boundary must be deleted and the boundaries adjusted.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	64.JPG
Latitude	N 41° 05.42'
Longitude	W 109° 48.65'
Elevation	6569 ft
Photo Direction	338° NNW

64 – The BLM's boundary separating units 144 and 002 is shown below. This route does not qualify as a boundary feature for wilderness inventory purposes.



Title:

Attributes

File Name	65.JPG
Latitude	N 41° 05.56'
Longitude	W 109° 48.70'
Elevation	6559 ft
Photo Direction	0° N

65 – BLM's boundary traverses directly up Dry Creek along no visible on-the-ground linear features.



Title:

Attributes

File Name	66.JPG
Latitude	N 41° 05.66'
Longitude	W 109° 48.74'
Elevation	6570 ft
Photo Direction	2° N

66 – The route along Dry Creek is absolutely not traveled. It is difficult to even locate any sort of linear feature on the ground.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	67.JPG
Latitude	N 41° 05.69'
Longitude	W 109° 48.75'
Elevation	6575 ft
Photo Direction	2° N

67 – While the route used for BLM's boundary of its wilderness inventory units 002 and 144 is somewhat visible on aerial imagery, on the ground it is almost impossible to differentiate from surrounding terrain and vegetation. This area clearly does not qualify as a wilderness inventory unit as defined by Manual 6310.

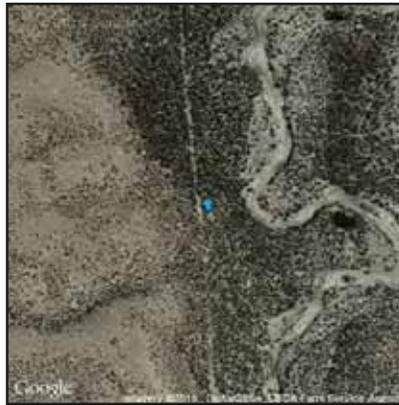


Title:

Attributes

File Name	68.JPG
Latitude	N 41° 05.73'
Longitude	W 109° 48.75'
Elevation	6575 ft
Photo Direction	350° N

68 – Another view of BLM's boundary. This route can be occasionally located on the ground, but is otherwise completely overgrown and invisible.



Title:

Attributes

File Name	69.JPG
Latitude	N 41° 05.65'
Longitude	W 109° 48.74'
Elevation	6573 ft
Photo Direction	349° N

69 – BLM's route inventory data identifies several routes dropping into Dry Creek. In several cases these routes do not exist whatsoever as seen below.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	70.JPG
Latitude	N 41° 06.39'
Longitude	W 109° 50.16'
Elevation	6886 ft
Photo Direction	99° E

70 – Photos 70 and 71 show the route we've cherrystemmed to the Wyoming State Trust Land parcel along Dry Creek (see map). This route has a pipeline system along its length. The route comes into the state lands from the west, but does not continue out the other side to the north or east.



Title:

Attributes

File Name	71.JPG
Latitude	N 41° 06.36'
Longitude	W 109° 50.07'
Elevation	6846 ft
Photo Direction	86° E

71 – The state trust lands access route shown in the distance. This route has been cherrystemmed from the unit.



Title:

Attributes

File Name	72.JPG
Latitude	N 41° 06.99'
Longitude	W 109° 51.14'
Elevation	6932 ft
Photo Direction	97° E

72 – A second route attempts to lead into the northwest corner of the state trust lands. This route shows no signs of construction or maintenance and unlike the route shown in the preceeding two photographs, is not a wilderness inventory road and should be left within the unit as an unmaintained primitive way.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	73.JPG
Latitude	N 41° 06.91'
Longitude	W 109° 50.61'
Elevation	6924 ft
Photo Direction	99° E

73 – an unmaintained primitive way leading into the NW corner of a state trust land parcel in Dry Creek.



Title:

Attributes

File Name	74.JPG
Latitude	N 41° 06.87'
Longitude	W 109° 50.30'
Elevation	6889 ft
Photo Direction	108° E

74 – The view east into Dry Creek and the State Trust Land parcel. The route shown in photos 72 and 73 largely disappears at this point.



Title:

Attributes

File Name	75.JPG
Latitude	N 41° 07.76'
Longitude	W 109° 46.95'
Elevation	6941 ft
Photo Direction	252° WSW

75 – Looking west into Dry Creek from the east. Despite numerous linear features appearing on BLM maps in the Dry Creek basin, as shown above these routes are not wilderness inventory roads. The Dry Creek area is entirely natural in appearance to the casual observer, as shown below.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	76.JPG
Latitude	N 41° 06.79'
Longitude	W 109° 46.48'
Elevation	7085 ft
Photo Direction	248° WSW

76 – A view east over the bulk of the Henrys Fork Hills unit. This unit is natural in appearance and contains countless draws and valleys which provide outstanding solitude to anybody who makes the effort to experience them. This area was an important location for native americans, and lithic scatters, chert flakes and tools, and other artifacts can be found throughout the unit.

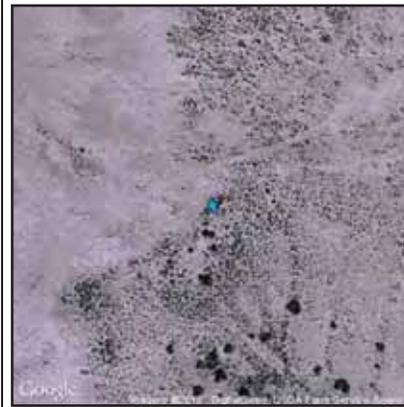


Title:

Attributes

File Name	77.JPG
Latitude	N 41° 05.44'
Longitude	W 109° 45.61'
Elevation	6990 ft
Photo Direction	331° NNW

77 – Large pinyon and juniper trees are found scattered throughout the unit, which when combined with the numerous rolling hills and winding draws, provides ample screening allowing visitors to find solitude.

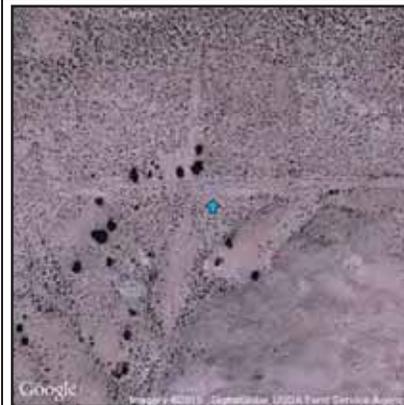


Title:

Attributes

File Name	78.JPG
Latitude	N 41° 05.93'
Longitude	W 109° 46.28'
Elevation	6882 ft
Photo Direction	0° N

78 – This unit is comprised of long, winding draws, and rolling hills. The views towards Flaming Gorge, the Uinta Mountains, and Cedar Mountain are great.



Title:

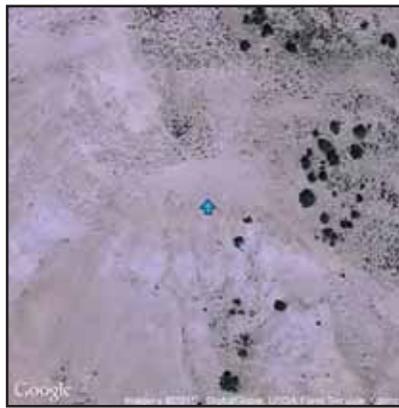
Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	79.JPG
Latitude	N 41° 05.35'
Longitude	W 109° 45.63'
Elevation	6968 ft
Photo Direction	0° N

79 – This unit is a pleasure to walk through. The recreational opportunities for hikers, backpackers, horsemen, and those seeking an opportunity to experience cultural resources in a backcountry setting are outstanding.

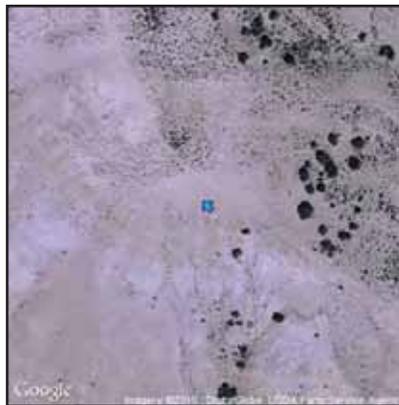


Title:

Attributes

File Name	80.JPG
Latitude	N 41° 05.36'
Longitude	W 109° 45.63'
Elevation	6987 ft
Photo Direction	319° NW

80 – Tiger Chert can be found throughout the unit and because of this fact the area was an important location for Native Americans. Tools, arrowheads, and spearpoints can be found throughout the unit and provide a supplemental value found here that should be protected.



Title:

Attributes

File Name	81.JPG
Latitude	N 41° 04.98'
Longitude	W 109° 45.69'
Elevation	6901 ft
Photo Direction	272° W

81 – Massive juniper trees can be found is several locations throughout this unit.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes

File Name	82.JPG
Latitude	N 41° 03.87'
Longitude	W 109° 42.64'
Elevation	6794 ft
Photo Direction	260° W

82 – Although not mapped as sage-grouse habitat, these birds and their scat can be found throughout the unit in the healthy sagebrush flats.



Title:

Attributes

File Name	83.JPG
Latitude	N 41° 06.84'
Longitude	W 109° 50.28'
Elevation	6844 ft
Photo Direction	124° SE

83 – Photographic opportunities in this unit are outstanding.



Title:

Attributes

File Name	DSC01317.jpg
Latitude	
Longitude	
Elevation	Invalid Position
Photo Direction	

84 – The rolling hills provide great hiking opportunities and provide long views and good vantage points utilized by backcountry sportsmen.



Title:

Devil's Playground: Henrys Fork Hills (BLM WY 040-2011-002 and WY 040-2001-144)

The photos below correspond to the waypoint descriptions included in the attached map and described in the narrative report. The location coordinates are included along with the photo direction if available.

Attributes	
File Name	DSC01320.jpg
Latitude	
Longitude	
Elevation	Invalid Position
Photo Direction	

85 – Looking down towards the Henrys Fork with wild horses in the foreground. Wild horses can be found in scattered herds in the Henrys Fork Hills providing outstanding primitive recreational opportunities. Large numbers of antelope also utilize the area.



Title:

Attributes	
File Name	DSC01363.jpg
Latitude	
Longitude	
Elevation	Invalid Position
Photo Direction	

86 – The views up towards Twin Buttes Wilderess Study Area are excellent. This unit shares many of the qualities found in the Twin Buttes WSA as it is only separated from that WSA by a primitive route.



Title:

Attributes	
File Name	hen1.jpg
Latitude	
Longitude	
Elevation	Invalid Position
Photo Direction	

87 – The Henrys Fork Hills unit has over 1000' feet of vertical relief and is by no means topographically flat or monotonous.



Title:

Nov 2015 Lease Sale EA Devil's Playground: Henry's Fork Hills Rock Springs FO

Devil's
Playground
WSA

Twin
Buttes
WSA

WY-1511-041

WY-1511-041

Legend

! Cities

⋈ Waypoints

— Wilderness Inventory Road

 Nov 2015 Prelim OG Parcels

 Devil's Playground: Henry's Fork Hills

 Devil's Playground/Twin Buttes WSAs

 BLM Field Office Boundary

Land Owner

 BLM

 State

 Other Public

 Private/Tribe

Data Sources: BLM, esri, SRCA
Map Prepared By: Alison Gallensky
Rocky Mountain Wild 5/18/2015 15-068 v1



0 1 2 3 4 5 Miles