



July 22, 2024

Director Tracy Stone-Manning  
Colorado State Director Doug Vilsack  
U.S. Bureau of Land Management  
c/o Protest Coordinator  
Via E-Planning

**RE: Protest of RMP Revision- Environmental Impact Statement, Colorado River Valley Field Office, and Grand Junction Field Office Supplemental EIS, DOI-BLM-CO-G020-2022-001-RMP EIS (SEIS)**

Dear Director Stone Manning,

BLM prepared the RMP Revision, SEIS as part of a settlement agreement to reconsider planning and management of BLM administered lands and federal fluid mineral estates. PEER and John Hiscock request that the BLM's Preferred Alternative G be rejected as contrary to law and the public interest in the resources protected by the Old Spanish National Historic Trail (OSNHT). **The prospect of siting oil and gas within 50 meters of a federally protected site in violation of the law, regulations, and the policies of the managing agencies is arbitrary and capricious and contrary to the public interest.**

Regarding the Old Spanish National Historic Trail and the selected preferred alternative, the SEIS states:

**GJFO**

Under Alternative G, no special restrictions would be put in place for surface occupancy or fluid mineral leasing outside the Old Spanish National Historic Trail corridor (a 50-meter buffer from the centerline of the congressional alignment), which could result in impacts on visual resources or the trail's setting. Portions of the Old Spanish National Historic Trail run along areas open to fluid mineral leasing. An NSO stipulation would only apply to the 50-meter buffer trail corridor. Future developments on public lands surrounding the OSNHT may impact the setting of the trail. Any potential impacts would be analyzed during site-specific NEPA processes. Level of impact to visual, historic, and cultural, recreational, and natural resources would be evaluated to determine whether to permit future use along the trail.

All resource management actions that degrade air quality could have indirect impacts on scenic viewsheds within national trails. Smoke, dust, haze, or other



pollutants could reduce visibility in the short- and long- term and impact a visitor's experience along the OSNHT.

SEIS at p. 3-200.

A 50-meter buffer (equivalent to 164 feet) is insufficient to provide for the public the use and enjoyment of the Old Spanish National Historic Trail required by the National Trail Systems Act (NTSA). BLM and the NPS have failed to prepare the Comprehensive Management Plan as required by the NTSA for the OSNHT and until that is complete, BLM should not make any land management decisions which impact the Trail.

The 50-meter buffer that BLM sets fail to meet the Trail Administrator default requirement—that is 5 miles on either side of the trail--set by the co-administrating agency – the National Park Service. BLM failed to follow its own default requirement using its own detailed national trail management policies that requires it to inventory local OSNHT resources, values, and opportunities prior to setting the protective buffer or corridor, and non-surface occupancy requirements. The record does not reflect that BLM ever conducted a complete inventory. The decision fails to consider the cumulative impacts to the trail in violation of the National Environmental Policy Act (NEPA).

**For these reasons PEER and John Hiscock protest the SEIS and request that the buffer be adjusted to the default width, that is 5 miles on either side of the trail, until BLM complies with the law and its own policies.**

**I. The Old Spanish National Historic Trail protections in SEIS Preferred Alternative G fail to comply with the requirements of the National Trails System Act (NTSA), 16 U.S.C. §§ 1241 *et seq.* (1968).**

The National Trails System Act describes and governs a national trails system comprised of legislatively established national scenic trails, national historic trails, and administratively established national recreation trails. The Secretary of the Interior delegated administration of twenty-one national historic and scenic trails to the National Park Service (NPS), including two jointly administered by the NPS and BLM, and one by the BLM. The Old Spanish Historic Trail is administered jointly by the NPS and BLM.

The Act makes clear that Historic Trails are not just established for the value of historic/cultural sites and artifacts along their path, but also the value of outdoor recreational opportunities that offer the public the chance to experience landscapes reflective of the historic period and events. The NTSA mandates land management responsibilities and actions and limits permissible uses along NTs.

Congress stated:

In order to provide for the ever-increasing outdoor recreation needs of an expanding population and **in order to promote the preservation of, public**



**access to, travel within, and enjoyment and appreciation of the open-air, outdoor areas and historic resources of the Nation**, trails should be established (i) primarily, near the urban areas of the Nation, and (ii) secondarily, within scenic areas and along historic travel routes of the Nation which are often more remotely located.  
16 U.S.C. §1241(a) (emphasis added).

Siting an oil and gas well near a historic trail will severely interfere with the public's use and enjoyment of the trail due to several factors. The noise and constant activity from the operations and associated operations like maintenance will disrupt the tranquility, the natural ambiance, and the ability to recreate the experience of historic use of the trail that the public seeks when visiting the trail. The potential for pollution and environmental damage will compromise the beauty and health of the surrounding ecosystem, diminishing the trail's appeal and the quality of the experience. The presence of industrial equipment and structures will mar the viewshed, the scenic vistas and historic relevance that make the trail a cherished destination.

The NTSA describes the purpose of National Historic Trails:

National historic trails, established as provided in section 5 of this Act, will be extended trails which follow as closely as possible and practicable the original trails or routes of travel of national historic significance. National historic trails shall have as their purpose the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment.

*Id. at (a)(3).*

The NTSA specifically addresses what uses and developments are allowed along Trail corridors of NTs on federal public lands. The Act directs the following:

National scenic or national historic trails may contain campsites, shelters, and related-public-use facilities. **Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted by the Secretary charged with the administration of the trail.** Reasonable efforts shall be made to provide sufficient access opportunities to such trails and, **to the extent practicable, efforts shall be made to avoid activities incompatible with the purposes for which such trails were established.**

16 USC§1246(c) (emphasis added).

This is a statutory directive, not a grant of discretionary authority. Oil and gas leasing should not be allowed within the trail corridor, the viewshed, or the buffer, as this will interfere with the nature and purposes of the Trail. It is certainly “practicable” to forego the issuance of discretionary oil and gas leases on federal lands within Trail management corridors.

## **II. The NTSA requires BLM and NPS Complete a Comprehensive Management Plan for the Old Spanish Before Making Land Management Decisions that Impact the Trail, the Trail Corridor, the Trail Viewshed, and the Trail Buffer.**

Comprehensive Management Plans for National Trails are developed and submitted to Congress pursuant to §1244(e), with a few such plans still in the development and review stages. In each case, the Comprehensive Management Plans, as major federal actions, are subject to the National Environmental Policy Act compliance process. A notable exception is the Old Spanish National Historic Trail established by Congress and law in 2002. In the case of the OSNHT, due to interagency conflict and disagreements between the delegated agency administrators – jointly, the NPS and BLM – a Comprehensive Management Plan has not been developed or submitted to Congress as required.

Fifteen years after congressional establishment of the OSNHT, the NPS and BLM developed an interim document, a Comprehensive Administrative Strategy (CAS) (2017). Unlike a Comprehensive Management Plan, the CAS is incomplete—it fails to provide a complete inventory, identify all high potential sites or segments, and direct comprehensive trail management, it does not have NEPA review, and it has never been submitted to Congress.

Even BLM points out the need for a CMP in the SEIS.

Management of the Old Spanish National Historic Trail is conducted in coordination with the National Park Service and local nonfederal partners. **Management direction provided for in planning and strategy documents has the potential to decrease the potential for degradation and assist in the preservation of natural, cultural, and historic trail resources.**

SEIS at p. 3-201.

The NTSA directs that the applicable Secretary/Administrator: “Pursuant to section 5(a), . . . shall select the rights-of-way for national scenic and national historic trails and shall publish notice thereof of the availability of appropriate maps or descriptions in the Federal Register”, and that “[t]he location and width of such rights-of-way across Federal lands under the jurisdiction of another Federal agency shall be by agreement between the head of that agency and the appropriate Secretary.” (emphasis added) 16 U.S.C. 1246(a)(2).

The width of proposed routes is unspecified at the time of statutory establishment. It is presumed that the agencies will manage a trail “corridor” or “buffer” as it makes no sense to establish, administer and manage a trail solely based on a 1/10 cm. line on a pre-enactment study map. The resources and values of trails could not be administered, managed, or protected on such an infinitesimally narrow geometric line designation. Consequently, the determination of the appropriate trail corridor or buffer is created in the



Comprehensive Management Plan and then included in federal land use plans such as the one in question.

When a trail inventory or an established corridor has not been set, the National Park Service recommends a 5 mile on either side of the trail corridor. CAS at p. 5. The NPS administers most of the National Trails and uses this default width on all its trails. The NPS is delegated Co-Administrator of the OSNHT.

In the current proposal, the National Park Service disagrees with the corridor width that BLM selected for the Preferred Alternative G. BLM referring to the NPS comments states:

“National Trails Commenters called for trail inventory to be completed along the Old Spanish National Historic Trail (NHT) to comply with the National Trails System Act of 1968. **Commenters asserted that the proposed 50-meter buffer is inadequate where the NHT's congressional alignment has not been inventoried.**” (emphasis added)

SEIS at F-6.

The NPS Trails Office more specifically commented on the proposed RMP:

Please note that impacts to the national historic trails should be evaluated primarily under the National Trails System Act of 1968, as resources comprising NHTs consist of more than historic properties pertaining to NHPA. For example, impacts to visual resources, setting, landscape, natural resources, and visitor experience are captured under NTSA evaluation.

...

BLM Manual 6280 stipulates that the NHT management corridor must be based on field inventory in accordance with FLPMA. Subsequent volumes 1 and 2 of the BLM Manual 6280 provide implementation guidance. **A 50-meter buffer is inadequate for NHT protection purposes**, especially in the case that the congressional alignment has not been inventoried in order to locate trail-related resources and to define a proper corridor. The congressional alignment for the NHT is not to be interpreted at a scale finer than 1:100,000. In cases in which the land manager has inventoried the NHT according to BLM Manual 6280, the management corridor should be determined from inventory data.

SEIS at F-56.

And, speaking for itself **and the BLM Co-Administrator** of the OSNHT commented:

The co-administrators request that trail inventory, both following BLM Manual 6280 manual as well as Class III survey per NHPA, be conducted along the trail where it intersects planning and management areas opened to fluid mineral leasing **prior** to said leasing in order to insure proper trail location as well as an



appropriate management corridor and project buffer. Only with all trails resources identified can impacts resulting from fluid mineral leasing be properly analyzed and minimized or mitigated. Language stating this requirement in the SEIS is requested to ensure compliance with NTSA and NHPA at the project level. (emphasis added)

These comments of the NPS and BLM Co-Administrators of the OSNHT seem to have been ignored.

BLM's selected buffer of 50 meters without a trail inventory has no explained basis and is an arbitrary and capricious decision.

In fact, BLM did recommend using the default 5-mile buffer in Alternative C and Alternative F. However, BLM gives no reason it was not used in the preferred Alternative G. The SEIS states:

Under Alternative C, management of the Old Spanish National Historic Trail would continue as described under Alternative A. In addition, an NSO stipulation prohibiting surface occupancy and surface-disturbing activities within a 0.5-mile buffer of the Old Spanish National Historic Trail would be in place. **A CSU stipulation would be applied within 5 miles of either side of the Old Spanish National Historic Trail.** Combined, these stipulations would provide the most protection from surface-disturbing activities among Alternatives A, B, C, and D.”

(Emphasis added) SEIS at pp. 3-198-199.

Under Alternative F, BLM concluded that the complete width, including the width of a protective corridor either set at the default width of **5 miles either side of the NT centerline**, or to be determined through a Manual 6280 inventory would be excluded from fluid mineral leasing.

We protest the currently selected 50-meter buffer and request that BLM apply the 5-mile buffer on either side of the OSNHT centerline, for Alternative G.

Additionally, the NTSA limits motorized vehicle use in Trail Corridors. The Act states, “Other uses along the historic trails and the Continental Divide National Scenic Trail, **which will not substantially interfere with the nature and purposes of the trail, and which, at the time of designation, are allowed by administrative regulations, including the use of motorized vehicles**, shall be permitted by the Secretary charged with administration of the trail.” *Id.* Therefore, the only permissible use of motorized vehicles on federal lands along NHTs must have: (1) pre-existed the enactment of the subject NHT; (2) been administratively authorized; and (3) not interfere with the nature and purposes of the Trail. Any federal “administrative” allowance should certainly be analyzed and



documented in federal agency land use management plans and specific plans such as BLM's travel management plans.

Oil and gas exploration and development activities routinely involve the use of motorized vehicles, normally conflict with, and interfere with the nature and purposes of Historic Trails and should, therefore, be prohibited in this case, from the Old Spanish corridor.

**III. The protections for the Old Spanish in the SEIS are contrary to BLM policy which requires trail segment analysis to set the trail Corridor prior to establishing management decisions of a historic trail.**

BLM policies contained in *Policy Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Public)* (2012) cover a comprehensive array of federal land management responsibilities as related to National Trails. Manual 6280 directs BLM land managers to conduct comprehensive inventories of NT natural and cultural resources, values and qualities including landscape settings, recreational opportunities, and existing compatible and incompatible uses on all BLM lands crossed by designated Trails. The policy states:

The affected BLM Field Offices, upon designation of a National Trail by Congress, conducts and assesses a field inventory of the National Trail resources, qualities, values, and associated settings and the primary use or uses of the trail for the public land areas through which such trails may pass. This chapter outlines inventory by individual landscape element, including scenic, historic, cultural, recreation, natural, and other landscape elements, and the assessment of that inventory for National Trail purposes.

Manual 6280, pp. 3-1.

Inventory data is to be utilized in establishment of Trail management corridors, in land management action assessments, and in development, amendment, or revision of land management plans. BLM is directed to:

- A. Use the inventory to make informed decisions regarding proposed uses within National Trail areas, to identify opportunities to safeguard the nature and purposes of National Trails, and to allocate the resources, qualities, values, and associated settings and the primary use or uses of the trail during land use planning (NTSA and FLPMA).
- B. Use the inventory to establish a National Trail Management Corridor through the land use planning process.
- C. Conduct inventory within the National Trail viewshed to identify the area of potential adverse impact for proposed actions, until such time as a National Trail Management Corridor is established.

D. Recommend to the National Trail administering agency for inclusion in the trailwide Comprehensive Plan, data regarding Federal Protection Components (land and water based components of a historic trail), including high potential historic sites and high potential route segments, identified, or discovered through the inventory process.

*Id.*

There is no indication that BLM properly inventoried natural and cultural resources, Trail values and qualities including Trail landscape settings, or recreational opportunities along the OSNHT, in accordance with Manual 6280.

Chapter 5 of Policy Manual 6280 instructs BLM managers on other land management actions, including oil and gas leasing, related to NT lands.

C. As soon as practical after activation, the BLM shall establish a National Trail Management Corridor through the land use planning process (see chapters 3 and 4 of this manual). **Until such time that the National Trail is addressed in a Resource Management Plan, the trail shall be managed, as appropriate, in accordance with the designating legislation and** according to the policy, procedures, and protocols outlined in this manual.

*Id.* at p. 5-1, §5.2(C) (emphasis added).

Chapter 5 indicates that land management actions are subject to law and the policy manual provisions **prior** to updating land management plans. Also, the NPS in its SEIS comments, noted that the inventory should be done **prior** to the lease plans. BLM notes National Park Service's preference for trail inventory to be completed along the Trail however, BLM simply kicks the can down the road.

While inventory work has been completed along segments of the trail within the Grand Junction Field Office, future inventory in accordance with BLM Manual 6280-1 is required. Additional discussion has been included in section 3.7.4 to explain that additional site-specific NEPA analysis would be conducted prior to authorizing any implementation actions which may impact the Old Spanish NHT and the BLM has the authority to require mitigation to avoid or minimize impacts during that site-specific NEPA evaluation.

There is no indication that BLM performed any NT inventory or analytically used any such unreferenced inventory data to propose and establish a justifiable Trail Management Corridor in accordance with Manual 6280.

IV. **The SEIS Process was Flawed Because it Failed to Consider Cumulative Impacts to the OSNHT in violation of the National Environmental Policy Act (42 U.S.C. §§ 4321 et seq,1970)**





The public use and enjoyment of the Old Spanish Historic Trail is steadily diminishing due to development on both private and public lands in or near the trail. Recently, we have witnessed a growing number of DOI/BLM oil and gas leasing activities that overlap with or encroach upon National Trail corridors. Moreover, numerous solar projects have infringed upon trails, sometimes resulting in its complete destruction. Despite our efforts to submit comments and protests on as many of these projects as possible, we have certainly not been able to comment on all of them and most of the time the trail considerations are ignored.

**We have included a list of 39 projects-- the majority are BLM projects-- in which we have commented because the Old Spanish Trail is adversely impacted.** It is the federal government's duty to consider the cumulative impacts of the piecemeal destruction of the OSNHT and protect this public treasure. It is crucial that the BLM evaluate the cumulative effects of the oil and gas lease plan in relation to the rest of the trail.

According to NEPA, federal agencies must assess the environmental effects of their proposed actions, including direct, indirect, and cumulative impacts. This is part of the broader requirement to take a "hard look" at the environmental consequences of their actions. Overall, NEPA mandates that cumulative impacts be an integral part of the environmental review process to ensure that the potential environmental consequences of proposed actions are comprehensively evaluated and understood. 40 CFR § 1508.7, 40 CFR § 1502.16, 40 CFR § 1508.25

BLM's consideration of cumulative impacts as stated in the SEIS is insufficient:

### **Cumulative Impacts**

Past, present, and reasonably foreseeable actions with the potential to have cumulative impacts on national trails include continued oil and gas development, ROW location, and, most importantly, increasing recreation and visitor use in the region, which put additional pressure on trails. Management of the Old Spanish National Historic Trail is conducted in coordination with the National Park Service and local nonfederal partners. Management direction provided for in planning and strategy documents has the potential to decrease the potential for degradation and assist in the preservation of natural, cultural, and historic trail resources.

As BLM continues to inventory resources along the Old Spanish National Historic Trail in accordance with Technical Reference 6280-1, additional mitigation measures may be added to projects proposed along the trail corridor. Any such measures would be applied on a project-level basis during subsequent NEPA review.

SEIS, p. 3-201



Please review and consider the comment letters in the attached folder which demonstrate how BLM's planning and actions, including RMPs, oil and gas leasing, and other actions are chipping away at the Old Spanish National Historic Trail:

BLM, Utah State Office - September 2020 Competitive Oil and Gas Lease Sale, DOI-BLM-UT- 0000-2020-0004-EA, Consolidated/Coalition EA Comments (July 9, 2020);

BLM, Utah State Office – December 2020 Competitive Oil and Gas Lease Sale DOI-BLM-UT- 0000-2020-0005-EA, J. Hiscock/PEER EA Comments (September 4, 2020);

OSTA EA Comments (September 4, 2020);

J. Hiscock/PEER Protest (November 2, 2020);

Each of these comment submissions, and protests are partial grounds for PEER and John W. Hiscock qualifying as protestant on the current SEIS.

It is for these reasons that PEER and John Hiscock request that the BLM's preferred alternative G be rejected as contrary to law and the public interest of the resources protected by the Old Spanish Historic Trail. Thank you for your consideration.

Sincerely,

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Public Employees for Environmental Responsibility  
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Cc:

John Cannella, NPS Trails Administrator  
Carin Farley, Program Lead for the BLM National Scenic and Historic Trails  
Carole Wendler, NPS Trails Acting Superintendent.  
Rob Sweeten, BLM OSNHT Co-Administrator



## **July 22, 2024, PROTEST of DOI-BLM-CO-G020-2022-001-RMP EIS (SEIS)**

PEER and John Hiscock protest the RMP Revision- Environmental Impact Statement (SEIS) Grand Junction, Colorado Field Office. PEER and John Hiscock submitted timely comments on nationwide DOI-BLM oil and gas leasing - Department of the Interior Oil and Gas Leasing Program Review Under Executive Order 14008 - April, 2021 (Attachment A) and the western states PEIS in Utility Scale Solar development - EIS Comments, #DOI-BLM-HQ-3000-2023-0001-RMP-EIS - Draft Programmatic Environmental Impact Statement for Utility-Scale Solar Energy Development - April 24, 2023 (Attachment B) fulfilling the public participation requirement.

We protest the impacts to the Old Spanish National Historic Trail and failures of BLM to comply with National Trails System Act; National Environmental Policy Act; BLM Manual 6280 policies regarding trail inventories, corridors, protections, and OSNHT Co-Administer, the NPS policies, and request that a 10 mile-wide corridor of the OSNHT be exempted from all O&G leasing until inventories and corridors are legally established.

Each has interests that will be affected and are proper parties to submit this protest.

This protest is being filed on behalf of:

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Rocky Mountain Office  
Public Employees for Environmental Responsibility  
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PEER protects public employees who protect our environment. We are a non-profit service organization for environmental and public health professionals, land managers, scientists, enforcement officers and other civil servants dedicated to upholding environmental laws and values. We work with current and former federal, state, local and tribal employees.

John Hiscock is a former National Park Service Superintendent. He spent 38 years working on behalf of the federal government as a park ranger, regulatory specialist, state coordinator, and leader of numerous management initiatives. He served as Association Manager of the Old Spanish Trail Association and is a life member. He is a member of PEER, CPANP, GOBW, GSEP, and the Southern Utah Wilderness Alliance.

PEER its staff and members, and John Hiscock use and enjoy the Old Spanish National Historic Trail, our public lands and their wildlife, cultural and natural resources for health,



recreational, scientific, spiritual, educational, aesthetic, and other purposes. All will be affected by impacts to wildlife, habitat, and water caused by future development in these areas. As a result, PEER and John Hiscock have an interest in the Old Spanish National Historic Trail, will be adversely impacted, and have the right to protest.

**List of Comment Letters submitted to protest impacts to the Old Spanish National Historic Trail**

AGENCY	Name/Description	Agency Ref. No.	Submitting Party	Cmt/Protest Date	Outcome	Notes
BLM - UT	Dft RMP – Beaver Dam Wash NCA		JWH/OSTA	11/15/2015		
BLM - UT	Moab Master Leasing Plan/RMPA		JWH/OSTA	11/23/2015		
BLM - UT	Richfield FO O&G Lease Sale - Consultation		JWH/OSTA	12/7/2015		
BLM - CA	CA – DRECP/LUPA		JWH/OSTA	12/10/2015		
BLM - UT	Richfield FO O&G Lease Sale - Consultation		JWH/OSTA	3/9/16		
BLM - National	Proposed rulemaking – RMP Planning	BLM-2016-0002-0044 / FR # 2016-09439	JWH/OSTA	5/25/2016		
BLM - UT	Richfield FO – Boulder Sale - Consultation		JWH/OSTA	6/24/2016		
BLM - UT	Cyn Country DO – O&G Leasing	DOI-BLM-UT-Y020-2016-	JWH/OSTA	8/10/2016		

		0042- EA				
BLM-UT	Moab FO – Gray Cyn Energy ROW - Consultatio n		JWH/OSTA	8/11/201 6		
NPS/BL M	OSNHT – Dft OSNHT CAS		JWH/OSTA	10/17/20 16		
NPS/BL M	OSNHT – Dft OSNHT CAS - Details		JWH/OSTA	10/17/20 16		
BLM - UT	Cyn Country DO/Moab FO – O&G Leasing	DOI- BLM- UT- Y020- 2016- 0042- EA	JWH/OSTA	10/20/20 16		
BLM - NV	So. NV DO – Energy Corridor		JWH/OSTA	10/24/20 16		
Trileaf (private) w/ FCC	Upland, CA	Trileaf # 625343	JWH/OSTA	10/10/20 16		
Trileaf (private) w/ FCC	Los Angeles, CA	Trileaf # 625780	JWH/OSTA	10/28/20 16		
BLM - UT	Moab FO – Tidewater APDs	DOI- BLM- UT- Y010- 2015- 0122- EA	JWH/OSTA	1/15/201 7		
USFS – Fire – Incident Team	Brain Head, UT Fire - Consult		JWH/OSTA	6/29/201 7		

DOI – Monume nt Rvw	Secretary, DOI - Cmts		JWH/OSTA	7/5/2017		
BLM - UT	Saint George FO – SG Arsenic Trtmt Plant - Consult		JWH/OSTA	7/27/2017		
USFS - CO	Revised Forest Plan – Gunnison NF		JWH/OSTA	12/8/2017		
BOR- W CO- Durango FD	Navajo Gallup Water Supply, San Juan County NM - Consult		JWH/OSTA	2/23/2018		
LA Metro Trans w/FHWA	Union Station Proj		JWH/OSTA	3/22/2018		
BLM - UT	GSENM – RMP Planning – Mon. Downsizing - Scoping		JWH/OSTA	4/13/18		
BLM – UT	Statewide O&G Lease Sale - Consult		JWH/OSTA	7/29/2018		
BLM - NM	Farmington FO – RMPA – O&G Leasing		JWH/OSTA	8/30/2018		
BOR – Upper Colorado Div.	Lake Powell Pipeline - Scoping		JWH	1/9/2020		
BLM - UT	Statewide O&G Lease Sales	DOI- BLM- UT-	Coalition – JWH/OSTA/PEER/ SUWA/CPANP/CBD/	7/9/2020		

	Proposal - Cmts	0000-2020-0004-EA	GOBW/LR/NPCA/NRDC / PNTS/TWS/SC/WA/W WP/WEG			
BLM-UT	Statewide O&G Lease Sales Proposal - Protest	DOI-BLM-UT-0000-2020-0004-EA	Coalition – JWH/OSTA/PEER/SUWA/CPANP/CBD/GOBW/LR/NPCA/NRDC / PNTS/TWS/SC/WA/W WP/WEG	8/21/2020		
BLM-UT	O&G Lease Sales Proposal - Cmts	DOI-BLM-UT-0000-2020-0005-EA	JWH/PEER	9/4/2020		
BOR-Upper Colo. Div. / BLM - AZ	Lake Powell Pipeline – DEIS / BLM-ASFO-RMPA		JWH/PEER	9/8/2020		
BLM-UT	O&G Lease Sales Proposal - Cmts	DOI-BLM-UT-0000-2020-0005-EA	JWH/PEER	11/2/2020		
BLM - UT	Cedar City FO – Bear Valley Veg Trtmt Proposal - Cmts	DOI-BLM-UT-C010-2021-0010-EA	JWH	4/9/2021		
DOI - Nationwide	DOI O&G Leasing Rvw -Exec Order 14008		Coalition – JWH/PEER/OSTA/CPANP/TWS/CDTC/PNTS/BCHA/PCTA/	4/15/2021	No resolution/rpt to date.	



			PNTA/GOBW/GSEP/AT F/ECRTNTA			
BLM - AZ	ASFO – Short Term ROW – Meterologic al Tower – Wind Energy	DOI- BLM- AZ- A010- 2021- 0026- CX	JWH/OSTA	1/18/202 2		
BLM - UT	Kanab FO – Paunsaugun t TMP - Scoping		JWH	3/25/22	No resolutio n/NEPA to date	
BLM - UT	GSENM DEIS/DRMP - Cmts		JWH	11/9/202 3	No resolutio n to date	
BLM - UT	Kanab FO – Upper Sevier Veg Trtmt EA - Cmts	DOI- BLM- UT- P020- 2023- 0010- EA	Coalition – JWH/PEER/ WWP/GCT	3/27/202 4	No resolutio n to date	
BLM - UT	Moab FO – East Coyote Fuelks Reduction	DOI- BLM- UT- Y010- 2024- 0012- EA	Coalition – JWH/PEER/WWP/GCT	4/9/2024	Protest period now open	
BLM – W. States	Western States Solar PEIS	DOI- BLM- HQ- 3000- 2023- 0001- RMP- EIS	Coalition – JWH/PEER/CPANP/W WP/SUWA	4/18/24	No resolutio n to date	