



January 17, 2024

The Honorable Tracy Stone-Manning
US Bureau of Land Management
1849 C Street, NW, Room 5646
Washington, D.C. 20240

RE: Draft Resource Management Plan for the Rock Springs Field Office

Dear Director Stone-Manning,

Please accept this letter as the official comments of the Rock Springs-Sweetwater County Airport Board "Airport Board" in response to the Rock Springs Field Office Proposed Resource Management Plan and Draft Environmental Impact Statement "Plan and Draft EIS". The Airport Board is a Joint Powers Board, formed under the laws of the State of Wyoming by the City of Rock Springs and Sweetwater County. The Board is responsible for the operations, maintenance, and development of the Southwest Wyoming Regional Airport "Airport", Southwest Wyoming's only commercial service airport. The Airport is responsible for more than \$37 million in annual economic impact to the local economy and serves as the gateway to our community for residents, tourists, businesses, and investors. Preserving the airport's abilities to meet the needs of our growing economy is critical to the Airport Board.

The Airport is located east of Rock Springs on lands that are bordered by several federally managed sections. Furthermore, all utilities and road systems serving the airport reside on or under federally managed lands. Furthermore, several critical Navigational Aids (NAVAIDs) are located on federally managed lands near the airport. The placement of and access to these NAVAIDs is critical for flight operations safety and airport viability. Unfortunately, every section of federally managed land that has a direct impact on the airport's current and future operations is included in the Plan and Draft EIS as Right-of-Way (ROW) Exclusions Areas. This creates grave concern from the Board as the long-term viability of airport will be adversely impacted if the Plan and Draft EIS are adopted as written.

Specific concerns related to the proposed Plan and Draft EIS are as follows:

- The Plan and Draft EIS's Preferred Alternative as written create significant regional socioeconomic impacts that would have an adverse impact on our local economy and the airport. Any negative pressures on existing and/or future industrial/commercial development and tourism will have an adverse impact on the airport's ability to maintain services. For instance, if existing industry were to reduce employment over time as a result of this preferred alternative, it would likely result in fewer air carrier passengers, potentially

- causing cessation of commercial air service in the community. Reduced aeronautical activity driven by reduced industrial development would have a significant adverse impact on the financial health of the airport, driving our dependency on local tax dollars higher.
- As previously mentioned, the federally managed lands surrounding the airport have been identified as ROW Exclusion Areas. The Airport Board is concerned that this designation in the preferred alternative will have the following adverse impacts:
 - Access to Navigational Aids (NAVAIDs) that sit on or are solely accessible by RSGA roads through BLM managed lands.
 - Emergency response access on established dirt roads around the airport proper that reside on BLM managed lands.
 - The airport is in a contractual relationship with a private developer for carbon removal and sequestration development on airport property. The intention is to pursue pore space right-of-way agreements with the BLM for pore space surrounding the airport. This right-of-way exclusion would prohibit that and adversely impact our ability to move forward with the utilization and monetization of the airport's pore space.
 - The Airport Board is concerned on the impact of the preferred alternative and the ROW Exclusion Areas on the airport's ability to seek a land conveyance of these lands from the BLM pursuant to the Airport and Airway Trust Fund of 1982 and 43 CFR 2640. If the right-of-way exclusion prohibited land conveyance, this would severely hamper future growth opportunities for the airport. 43 CFR 2640 states, "Upon receipt of the request from the Administrator, the authorized officer shall determine whether the requested conveyance is inconsistent with the needs of the Department of the Interior (DOI), or any agency thereof..." The Airport Board is concerned that the DOI would find that conveyance of these lands would not be consistent with the needs of the DOI based on this preferred alternative.
 - The right-of-way exclusions would prohibit the airport from seeking right-of-way agreements with BLM for infrastructure development leading to the airport (i.e. water, sewer, gas, electricity).
 - The right-of-way exclusions would prohibit the airport from seeking right-of-way agreements with BLM for airport development projects on lands around the airport. Specifically identified for exclusion are the most likely and beneficial lands for development due to terrain. Specific sections of land that are of interest to the airport, but listed as exclusion areas are:
 - T19N R103W SEC 20
 - T19N R103W SEC 28
 - The Airport is the only Commercial Service Airport in the lower 48 that must truck both potable and fire suppression water to serve its facilities. The Airport is not connected to the municipal water supply. In partnership with Sweetwater County, the City of Rock Springs, the Joint Powers Water Board, Simplot Phosphates, Sweetwater Economic Development Coalition, and several others, plans are underway to develop robust water infrastructure east of town to not only support the airport but industrial development between the airport and Simplot Phosphates. The preferred alternative would render the efforts undertaken by partnership useless and eliminate the possibility of delivering a municipal water supply to the airport.
 - Volume 1, Page 2-109 - Under Land Resources (LR) - Lands and Realty - Alternative B states, "Limit geologic carbon sequestration exploration and site characterization projects and commercial sequestration projects and facilities to the Rock Springs Uplift." Please see my comment above regarding the airport's CO2 sequestration intentions. Furthermore, this

exact statement tells of how this RMP is flawed. The current administration has invested billions into CCUS and our area is prime for CCUS development, yet, they now propose to eliminate that type of development on what is likely the most prolific geological storage site (Rock Springs Uplift) in the country.

- Map 2-18: Visual Resource Management - Alternative B - Lands around airport (north and west) identified as VRM Class III which states that changes in the basic elements (form, line, color, or texture) caused by a management activity may be evident. However, the changes should remain subordinate to the visual strength of the existing character. This would have a limiting impact on development on BLM managed lands around the airport.
- Appendix B - Management #4430 - Raptor Nests: States that there shall be no surface occupancy within a 1-mile radius of raptor nests. It further specifically identifies airports as infrastructure that have the potential to cause direct avian mortality.
 - Map 3-4 shows a raptor nest right on the edge of the airport property (western side on the approach to Runway 9). This would eliminate the ability for surface occupancy on BLM managed lands within 1 mile which would once again have an adverse impact on any development around the airport. Surface occupancy is defined as, "Placement or construction on the land surface of semi-permanent or permanent facilities requiring continual service or maintenance". The Airport Board sees this once again impacting infrastructure leading to the airport including the roadway, water, sewer, gas, and electric.

The Airport Board respectfully requests that the Bureau of Land Management ensure that the federally managed lands surrounding the Airport as well as lands between the Airport, the City of Rock Springs, and Simplot Phosphates be removed from ROW Exclusion Areas in the final RMP. Specifically, following sections of land should remain available for development, ROWs, and potential land conveyances:

- T19N R104W SEC24
- T19N R103W SEC20
- T19N R103W SEC28
- T19N R103W SEC32
- T19N R104W SEC26
- T19N R104W SEC34
- T18N R104W SEC2
- T18N R104W SEC4
- T18N R104W SEC10
- T18N R104W SEC14
- T19N R104W SEC22

The availability of these lands for future development will play a critical role in our community's and our airport's economic vitality. The Airport Board appreciates due consideration of these comments and looks forward to adoption of our recommendations in the final RMP.

If you have any questions, please feel free to reach out to me at dbrubaker@flyrks.com or (307) 352-6880 x102.

Sincerely,



Devon Brubaker, A.A.E.
Airport Director