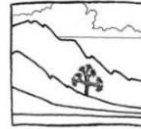


Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)



WESTERN  
WATERSHEDS  
PROJECT



Basin and Range Watch

**John W. Hiscock**  
**Public Employees for Environmental Responsibility**  
**The Coalition to Protect America's National Parks**  
**Southern Utah Wilderness Alliance**  
**Western Watersheds Project**  
**Basin and Range Watch**

**Scoping Comments - DOI-BLM-UT-0000-2026-0005-EA - BLM Utah 2026 Third Quarter  
Competitive Oil and Gas Lease Sale Environmental Assessment**

April 15, 2026

Bureau of Land Management  
Utah State Office

To whom it may concern:

These scoping comments are submitted by the following individuals and organizations regarding the proposed BLM project - DOI-BLM-UT-0000-2026-0005-EA - BLM Utah 2026 Third Quarter Competitive Oil and Gas Lease Sale Environmental Assessment: John W. Hiscock; Public Employees for Environmental Responsibility; The Coalition to Protect America's National Parks; Southern Utah Wilderness Alliance; Western Watersheds Project; and, Basin and Range Watch.

The focus of these specific comments is on the impacts of the project on the North Branch Route and the Northern Route of the Old Spanish National Historic Trail (OSNHT) in the Moab Field Office area of Bureau of Land Management (BLM) lands in southeast Utah. More specifically, these comments express concerns with Department of the Interior (DOI), BLM, and National Park Service (NPS) administration, management, and protection of the OSNHT, and its resources and values in the vicinity of the proposed

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

oil and gas lease parcels 1805, 1806, 1809, 7935, 7937, 7941, and 7947, all of which are crossed or proximate to the OSNHT.

The principal National Environmental Policy Act (NEPA) analysis issue this project proposal gives rise to, in regard to the OSNHT, is a determination that the discretionary BLM issuance of oil and gas leases under the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. §1701, et. seq. and the Secretary of the Interior's statutorily mandated management and protection obligations under the National Trails System Act (NTSA), 16 U.S.C. §1241, et. seq. do not conflict. It is well established that multiple use authorizations, such as oil and gas leasing on public lands pursuant to FLPMA, are precluded by congressional statutes prescribing more specific and protective uses. *See* 43 U.S.C. §1732(a). The proper management and protection of National Historic Trails, such as the OSNHT, under the NTSA specifically limits the Secretary of the Interior's authorization of activities as follows: "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." 16 U.S.C. 1246(c). Consequently, DOI and BLM must reach a finding that oil and gas leasing on NT lands "will not substantially interfere with the nature and purposes" of the OSNHT. There are numerous procedural steps required by NTSA and BLM policy that must be completed before a valid analysis potentially leading to such a conclusion can be reached. **It is the position of the individuals and organizations submitting these comments that such procedural steps must be accomplished independently, and prior to, this lease sale proposal.** The following information substantiates that conclusion.

John Hiscock, PEER, CPANP, and BRW are currently plaintiffs in litigation against the Department of Interior over many of the same issues referenced concerning proper administration and management of the OSNHT. The legal claims raised in that case directly relate to and also weigh against the action that BLM is now considering. Given the ongoing litigation, BLM should consult with its counsel before moving forward with this project and EA.

### **BACKGROUND**

#### **- The National Trails System Act (16 U.S.C. §§ 1241 – 1251)**

The National Trails System Act (NTSA) was passed by Congress in 1968, initially establishing national scenic trails (NSTs). It was amended in 1978 to include national historic trails (NHTs).

The general purpose of each NHT is "identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment." *Id.* at §1242(a)(3).

The NTSA spells out what is allowed along NSTs and NHTs – "National scenic or national historic trails may contain campsites, shelters, and related-public-use facilities." Other unlisted uses along each 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." *Id.* at §1246(a)(c).

#### **- Old Spanish National Historic Trail Established (P. Law 107-325; 16 U.S.C. §1244(a)(23))**

The Old Spanish National Historic Trail (OSNHT) was established by Congress in 2002. *Id.* It consists of routes utilized for trade and other purposes, from 1829 – 1848, between Santa Fe, New Mexico and Los Angeles, California. Congress designated the OSNHT Northern Route, Armiijo Route, North Branch, and Mojave Road as portions of the OSNHT "as generally depicted on the maps numbered 1 through 9, as contained in the report entitled 'Old Spanish Trail National Historic Trail Feasibility Study,' dated July

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

2001.” *Id.* at §1244(a)(3)(A). The established routes total approximately 2700 miles including federal and non-federal lands.

The enabling legislation directed that the Secretary of the Interior would act as Administrator of the OSNHT. *Id.* at §1244(a)(3)(C).

### - **Co-Administration of the OSNHT Delegated to the NPS and BLM by the Secretary of the Interior**

In July of 2003, Secretary of the Interior, Gale Norton delegated administrative responsibility for the OSNHT, jointly, to the NPS and BLM. *See, Memorandum – Administrative Responsibility for the Old Spanish National Historic Trail*, Gale Norton, Secretary of the Interior (July 5, 2003).

### - **National Landscape Conservation System – Omnibus Public Lands Management Act (16 U.S.C. §7202)**

The National Landscape Conservation System (NLCS) was established in 2009 via the Omnibus Public Lands Management Act. 16 U.S.C. §7202. The NLCS was mandated to include “Each area that is designated as . . . a national scenic trail or national historic trail designated as a component of the National Trails System” and “administered by the Bureau of Land Management.” *Id.* at §7202(b)(1)(D). The purpose of the NLCS is “to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations” and directs the Secretary to manage such lands “in a manner that protects the values for which the components of the system were designated.” *Id.* at §7202(a) & (c)(2).

The OSNHT is a “component” of the NLCS, and the management direction cited reiterates the mandated protection of its landscape values.

### - **BLM Formally Adopts Agency Policies for NT Administration and Management**

On September 14, 2012, the BLM formally adopted two separate policy manuals regarding agency administration and agency management of NTs. Those two documents that thus became part of the BLM’s Directives System are: Manual 6250 - National Scenic and Historic Trail Administration; and Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation.<sup>1</sup> Furthermore BLM Manual 1221 – BLM Directives, mandates responsibility for adhering to BLM policy manuals, such as Manual 6250 and Manual 6280, squarely on all BLM managers and employees.

## **STATUTORY AND POLICY MANDATES AND DIRECTIVES UNADDRESSED BY OSNHT ADMINISTRATORS AND BLM LAND MANAGERS**

In the statutes and agency policies cited above, the OSNHT Co-Administrators, and BLM land managers at the BLM State Directorate level, and field unit level are obligated to take certain actions in timely

---

<sup>1</sup> To be clear, NTs established by Congress such as the OSNHT are subject to this management manual. They are not only “recommended as suitable for congressional designation” but are so designated. Manual 6280 states: “In sum, this manual describes the statutory requirements and policy guidance for managing trails under study and trails recommended as suitable, including the requirements and goals for such trails during the land use planning process. **This manual also describes the statutory requirements and policy guidance for the management of designated trails, including those related to inventory, land use planning, management, and monitoring.**” Manual 6280, p. 1-3 (emphasis added).

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

fashion regarding administration, management, and protection of the OSNHT. The following specifics will demonstrate how the DOI Co-Administrators, and said BLM land managers failure to execute such responsibilities, and their misinterpretation of such responsibilities, has resulted in mismanagement, or non-management of the OSNHT in violation of the law. Without fulfilling such NTSA requirements which override discretionary FLPMA actions, such as the proposed oil and gas leasing in this instance, the DOI and BLM managers have exceeded their authority. Furthermore, the OSNHT Administrators and BLM land managers legally and procedurally inadequate geographical alterations of the alignment of the congressionally enacted OSNHT demonstrate the arbitrary and arguably capricious administration and management of the OSNHT

- **The Failure of the Federal Administrator of the OSNHT, the Secretary of the Interior, and Its Administrative Delegates, the BLM and the National Park Service, to Issue a Comprehensive Management Plan (CMP) for the OSNHT as Required by Statutory Law**

The NTSA mandates that:

Within two complete fiscal years of the date of enactment of legislation designating a national historic trail [for the OSNHT, December, 2005] . . . the responsible Secretary [for the OSNHT, the Secretary of the Interior] shall, . . . submit to the Committee on Interior and Insular Affairs of the House of Representatives and the Committee on Energy and Natural Resources of the Senate, a comprehensive plan for the management, and use of the trail, including but not limited to, the following items:

- (1) specific objectives and practices to be observed in the management of the trail, including the identification of all significant natural, historical, and cultural resources to be preserved, details of any anticipated cooperative agreements to be consummated with State and local government agencies or private interests, and for national scenic or national historic trails an identified carrying capacity of the trail and a plan for its implementation;
- (2) the process to be followed by the appropriate Secretary to implement the marking requirements established in section 7(c) of this Act;
- (3) a protection plan for any high potential historic sites or high potential route segments; and
- (4) general and site-specific development plans, including anticipated costs.

16 U.S.C. §1244(f).<sup>2</sup>

---

<sup>2</sup> The proposed oil and gas lease parcels appear to lie along sections of the North Branch Route and the Northern Route of the OSNHT that the Administrators have recommended in their Comprehensive Administrative Strategy (CAS)(a document described within these comments) as high potential route segments – in the north, along the Book Cliffs “High Potential Route Segment,” and in the south, along the Blue Hills “High Potential Route Segment.” The NTSA defines “high potential route segments” as “those segments of a trail which would afford high quality recreation experience in a portion of the route having greater than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route.” See 16 U.S.C. §1251(2). As discussed, the proposed project will significantly alter the Trail landscape in these areas and damage the values of these “high potential route segments.”

And, although a specific “protection plan” for identified “high potential historic sites or high potential route segments” is required by NTSA, the NTSA generally protects **all** federal lands crossed by NHTs as “Federal protection components.” 16 U.S.C. §1242(a)(3). The NTSA defines “Federal protection components” of NHTs as follows: “those selected land and water based components of a historic trail which are on federally owned lands and which meet the national historic trail criteria established in this Act are included as Federal protection components of a national historic trail.” 16 U.S.C. §1242(a)(3). Because the NTSA directs that only trails and routes meeting established criteria be congressionally established as NHTs (see 16 U.S.C. §1244(b)(11)), and the NPS Feasibility Study cited by Congress (see *National Historic Trail Feasibility Study and Environmental Assessment – Old Spanish Trail*, United States Department of the Interior, National Park Service (July, 2001)) as the basis for

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

A full year after the mandated due date for a OSNHT CMP, the NPS and BLM Co-Administrators for the Trail issued a “Notice of Intent to Prepare a Comprehensive Management Plan/Environmental Impact Statement for the Old Spanish National Historic Trail . . .” in the Federal Register. *Notice of Intent to Prepare a Comprehensive Management Plan/Environmental Impact Statement for the Old Spanish National Historic Trail; New Mexico, Colorado, Arizona, Utah, Nevada, and California – NPS & BLM, 71 Fed. Reg. 11, 2956 (2006)*. That Notice stated that related documents were available from the Co-Administrators, and public comment was sought. The Notice also stated that: “Public participation elements will include, but not be limited to, public notices and press releases; newsletters and a project web page; public meetings (scoping, alternative development, and review of draft EIS); and depositories for public document review.” *Id. at 2957*. This statement confirms that the Notice, at least initially was for NEPA scoping purposes only. In fact, a Scoping Report was completed in August, 2006, and at that time implied that a Draft CMP/Draft EIS would follow. *See, Scoping Report - Old Spanish National Historic Trail Comprehensive Management Plan/Environmental Impact Statement - U.S. Department of the Interior, Bureau of Land Management, New Mexico State Office, Division of Resources & National Park Service, National Trails System, Santa Fe (August 2006)*.

By all indications, the preparation of a OSNHT CMP and related EIS appear to have been abandoned as no such follow-up work exists.<sup>3</sup> To date, the Secretary of the Interior has not completed, or submitted a “comprehensive plan for the management” of the OSNHT in accordance with the NTSA statutory mandate.

Furthermore, the completion of a “Old Spanish National Historic Trail Comprehensive Administrative Strategy” Issued by the Secretary of the Interior’s BLM and NPS OSNHT Co-Administrators in 2017 fails to meet NTSA mandates, or National Environmental Policy Act (NEPA) requirements and cannot be considered legally equivalent.

After years of foundering in regard to the NTSA required “comprehensive plan for management,” in approximately 2015, the BLM and NPS internally agreed to pursue the preparation of what they chose to title a Comprehensive Administrative Strategy (CAS) for the OSNHT. The CAS, completed in 2017 described the delinquency in planning and development of the CAS in this way:

On June 19, 2014, the NPS’s Intermountain Regional Director and the BLM’s Utah State Director met with the NPS / BLM joint agency planning and administrative team for the Old Spanish National Historic Trail regarding the completion of a comprehensive plan for the administration of the national historic trail. The planning and administrative team had completed a

---

enactment of the OSNHT concluded that all such NHT criteria were met, it is clear that all portions of the OSNHT on federal lands are “Federal protection components” of the Trail. All portions of the OSNHT on federal lands, including those portions crossing or running adjacent to the proposed BLM oil and gas leases, are “Federal protection components” of the OSNHT. Therefore, the Secretary is obligated to make a determination that the proposed oil and gas lease sales “will not substantially interfere with the nature and purposes” of the OSNHT as part of any compliance related to such proposal, **regardless of any Co-Administrator designation of the sections of Trail in the project area as high potential route segments.. However, the Co-Administrators recommendation of the noted stretches of the Trail as high potential route segments should definitely be considered as a DOI determination of the heightened values of these sections of the Trail and support the elimination of the noted lease parcels from this proposal.**

<sup>3</sup> It should be noted that no evidence exists of compliance with NEPA regarding the development of even a draft CMP for the OSNHT. Reference <https://parkplanning.nps.gov/parkHome.cfm?parkId=456> which appears to be an accounting of all NPS “Planning, Environment, and Public Comment (PEPC)” documents.

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

comprehensive management plan and draft environmental impact statement in compliance with the National Trails System Act and the National Environmental Policy Act. However, policy changes within the BLM then resulted in a lack of concurrence with the plan. To resolve this issue, the NPS Regional Director and BLM Utah State Director agreed that the draft comprehensive management plan/environmental impact statement would be modified and presented as a comprehensive administrative strategy. They also agreed that the strategy would provide the BLM with the opportunity to outline how the agency would meet all applicable national historic trails policies separately after development of the strategy found in this document. The NPS agreed that the change to a comprehensive administrative strategy would not impede their collaborative efforts to administer trail resources and values.

*Comprehensive Administrative Strategy for the Old Spanish National Historic Trail, NPS & BLM, p. viii (December, 2017).*<sup>4</sup> The CAS also stated:

The purpose of this strategy is to establish the administrative objectives, protocols, processes, and guidelines necessary to fulfill preservation and public use goals for the entire Old Spanish National Historic Trail. Although the National Trails System Act (NTSA) designating the Old Spanish National Historic Trail does not specifically require the development of a planning document, Section 5(f) of the Act requires that a comprehensive plan be developed for all designated national historic trails. This administrative strategy will function as the core component of the planning portfolio for the Old Spanish Trail comprehensive strategy, focusing on administration.

*Id. at vii.* This language specifically contradicts NTSA's mandate and procedure for a CMP for each NHT. It also confuses the issue of an administrative strategy versus a comprehensive strategy versus a comprehensive plan, and which may be a sub-plan of another, or whether a CMP will ever be completed.

Furthermore, there is no doubt that NEPA compliance was ever achieved for the OSNHT CAS. It is worthy of note that other comprehensive plans for management of NSTs and NHTs which have been completed, have all undergone NEPA assessment.

Regardless, of the Administrators confused statement of intent regarding the CAS, the lack of NEPA compliance for the undertaking, and other shortfalls, demonstrate that the CAS does not suffice to legally replace a CMP.

### **- The Federal Administrator of the OSNHT, the Secretary of the Interior, and Its Administrative Delegates, the BLM and the National Park Service, Have Failed to Select a Right-Of-Way for the OSNHT as Required by Statutory Law**

The NTSA mandates that: "Pursuant to section 5(a), the appropriate Secretary [[for the OSNHT, the Secretary of the Interior] 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 . . ." 16 U.S.C. 1246(a)(2).

To date, the Secretary of the Interior has not selected or published "appropriate maps or descriptions" of such rights-of-way for the OSNHT in the Federal Register in accordance with this statutory mandate.

---

<sup>4</sup> No explanation for why "policy changes within the BLM precluded "concurrence with the plan" has ever been offered. No "modification" of a "environmental impact statement" for the CMP has ever been presented as related to the CAS. The BLM's "opportunity to outline how the agency would meet all applicable national historic trails policies separately after development of the strategy found in this document" would have been achieved through subsequent BLM adherence to the policy process laid out in its Manual 6280 when developing, or in this case amending, its field unit RMPs. Routinely, in regard to most, if not all BLM RMPs, and in specific regard to the Moab RMP those policies, and recommendations of the CAS, were not, or have not, been incorporated.

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

### - **The BLM's Moab Field Office RMP Fails to Adequately Recognize the Existence of the OSNHT, and Its Appropriate Management and Protection in the Context of the Management Provisions of the NTSA, the NPS/BLM CAS Recommendations, and BLM Policy**

The relevant BLM resource management plan (RMP) for the Moab Field Area has not been amended since 2008 and contains little, if any, guidance on the management or protection of the statutorily established OSNHT, despite statutory provisions of the NTSA that have been applicable since 2002. At least the RMP identifies the OSNHT as a special designation, but does not go much further regarding management prescriptions for such. The RMP does not reference the existence of the extensive 2012 BLM policy manual on management of national trails pursuant to the NTSA – Manual 6280 – Management of National Scenic and Historic Trails (09/14/2012), but the RMP mentions a “forthcoming” but still yet to be issued CMP for the OSNHT, stating the following:

SPECIAL DESIGNATIONS: NATIONAL TRAILS AND BACKWAYS (TRA)

Management Decisions:

National Historic Trail – Old Spanish Trail

....

TRA-3

Consider plan amendment, as necessary, to incorporate provisions of the forthcoming Old Spanish Trail Comprehensive Management Plan.

TRA-4

Participate in the development of the management plan for the Old Spanish Trail Comprehensive Management Plan and assist with its implementation as opportunities arise, consistent with other decisions of the RMP.

TRA-5

Support protective management, interpretation, and public enjoyment and understanding of the National Historic Old Spanish Trail, consistent with the Old Spanish Trail Comprehensive Management Plan.

*Record of Decision and Approved Resource Management Plan*, Bureau of Land Management, Moab Field Office (October, 2008) p. 109. No solid evidence exists of the Field Office's coordination with the NPS in management of the Trail. These statements in the Moab FO RMP, exemplify the field unit management paralysis on proper management and protection of the OSNHT.

As previously covered, the OSNHT was established as part of the National Trails System and subject to the allowances and restrictions of the NTSA in 2002, and the provisions of the NLCS in 2009. In addition to NTSA allowances and restrictions applicable to all federal public lands along NTs, the special statutory designation of the OSNHT activated the previously noted exception of FLPMA's multiple use and sustained yield mandate. To reiterate, FLPMA states:

The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him . . . , **except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.**

*43 U.S.C. §1732(a) (emphasis added).*

The insufficiency of the Moab RMP in assessing and providing guidance on the precedential management mandates of the NTSA and the NLCS is patently obvious in a number of other ways as well.

The special statutory goals, restrictions, and limitations on allowances, of the NTSA in regard to the OSNHT were undoubtedly insufficiently addressed in the RMP due to the lack of a OSNHT CMP and the guidance such NTSA CMPs routinely provide. Even though BLM was fully aware of the delinquency of

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

an OSNHT CMP at the time of the subject RMP, the RMP goes no further in addressing the requirements of the NTSA.

Regardless of the existence of a OSNHT CMP, the subject RMP should have included and promoted NTSA purposes, allowances, and restrictions within a prospective NTSA Trail right-of-way. These would include:

- The overall NTSA purpose “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” (*16 U.S.C. §1241(a)*);
- The purpose of national historic trails to include “the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment” (*16 U.S.C. §1242(a)(3)*), and the purpose of affording the public “an opportunity to vicariously share the experience of the original users of a historic route.” (*Id. at §1251(2)*);
- The NTSA provision that all “selected land and water based components of a historic trail which are on federally owned lands and which meet the national historic trail criteria established in this Act are included as Federal protection components of a national historic trail.” (*16 U.S.C. §1242(a)(3)*);
- The NTSA allowance for “campsites, shelters, and related-public-use facilities,” “retracement” routes, trail “markers,” and “interpretation sites” within the Trail right-of-way (*16 U.S.C. §1246(c)*);
- The NTSA disallowance of other uses along the Trail which would substantially interfere with the Trail’s nature and purposes (*Id.*);
- The disallowance of “activities incompatible with the purposes for which such trails [the OSNHT] were established” (*Id.*);
- The limitation of the use of motor vehicles “which will not substantially interfere with the nature and purposes of the trail and which at the time of designation, . . . [were] allowed by administrative regulations” (*Id.*);

Since the approval of the pertinent RMP in 2008, additional clarifications and management direction regarding NT management has been clearly and comprehensively stated in BLM policies, the NPS/BLM OSNHT CAS, and other BLM initiatives and should have, but have not resulted in a Moab Field Area RMP amendment and management restrictions preventing adverse impacts to the OSNHT. Here is a summary of such applicable policies all of which are applicable to a determination that the proposed project will not substantially interfere with the nature and purposes of the Trail, and are, therefore critical to the compliant preparation of the EA on the subject project:

- BLM Policy Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (2012)<sup>5</sup>

---

<sup>5</sup> The “Manual Transmittal Sheet” for 6280 clarifies that said Manual “provides the line manager and program staff professionals with policies for the management of National Scenic and Historic Trails. Specifically, this manual identifies requirements for the . . . inventory, planning, management, and monitoring of designated National Scenic and Historic Trails . . .” BLM Manual Transmittal Sheet, 6-139, *6280 – Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation (Public)* (9/14/2012).

The sections of policy Manual 6280 cited here summarize many basic and overarching guidance critically pertinent to other issues discussed in these scoping comments. Policy Manual 6280 is comprehensive and extensive and all its additional provisions regarding “Inventory” – Chapter 3; “Land Use Planning” – Chapter 4; “Management” – Chapter 5; and “Monitoring” – Chapter 6 are also critically important and reflect BLM commitment and processes

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

- Explanation of purposes of CMPs - “Once designated, a statutorily required trailwide Comprehensive Plan (NTSA Sec. 5(e)(f)) is developed by the assigned National Trail administering agency in coordination with local land managers, such as the BLM, referred in this manual as a National Trail managing agency. . . . The Comprehensive Plan . . . includes selection of a National Trail Right-of-Way . . . . the trailwide Comprehensive Plan will be used to guide the BLM’s Resource Management Plan development and implementation level planning in accordance with this policy.” (*BLM Manual 6280, p. 1-2*).
- Subsequent land management planning responsibility and process – “After Congressional designation, the BLM conducts an inventory of designated trails under FLPMA and NTSA authorities; addresses the National Trail through the land use planning process, including the establishment of the National Trail Management Corridor; and manages and monitors the National Trail in coordination with the National Trail administering agency (which might be the BLM, if assigned), tribes, other agencies, partners, and interested parties.” *Id.*
- Definition of NHT – “National Historic Trail. An extended, long-distance trail designated by Congress that is not necessarily managed as continuous but follows as closely as possible and practicable the original trails or routes of travel of national historic significance. The purpose of a National Historic Trail is the identification and protection of the historic route and the historic remnants and artifacts for public use and enjoyment. A National Historic Trail is managed to recognize the nationally significant resources, qualities, values, and associated settings of the areas through which such trails may pass, including the primary use or uses of the trail. Federal Protection Components associated with the National Historic Trail, including high potential historic sites, high potential route segments, and auto tour routes are identified by the National Trail administering agency through the trailwide Comprehensive Plan.” *Id. at 1-4*.
- Definition of National Trail Manager – “National Trail Manager. The on-the-ground land managing agency, landowner, or interest with the authority and/or responsibility for decision making for lands under its jurisdiction. Also, the official responsible for land and water management of trail-related resources. The BLM, as National Trail manager, inventories the National Trail resources, qualities, values, and associated settings, and the primary use or use(s); establishes the National Trail Management Corridor through the land use planning process; manages resources and uses in a manner that will not substantially interfere with the nature and purposes of the National Trail; makes efforts to avoid incompatible activities; and monitors the National Trail.” *Id. at 1-5*.
- Definition of National Trail Right-Of-Way – “National Trail Right-of-Way. Term used in Section 7(a)(2) of the NTSA to describe the area selected by the National Trail administering agency in the trailwide Comprehensive Plan and which **includes the area of land that is of sufficient width to encompass National Trail resources, qualities, values, and associated settings, and the primary use or uses.** National Trail Right-of-Ways identified in the trailwide Comprehensive Plan are not BLM land use allocations because the NTSA does not transfer management responsibility to the National Trail administering agency. **The National Trail Right-of-Way becomes a key consideration in designating the National Trail Management Corridor in a Resource Management Plan.**” *Id at 1-6 (emphasis added)*.

---

for proper management of NTs. Compliance with all such policy provisions is incorporated by reference in these scoping comments.

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

- Definition of National Trail Management Corridor – “National Trail Management Corridor. Allocation established through the land use planning process, pursuant to Section 202 of FLPMA and Section 7(a)(2) of the NTSA (“rights-of-way”) for a **public land area of sufficient width to encompass National Trail resources, qualities, values, and associated settings and the primary use or uses that are present or to be restored. To determine the width of the National Trail Management Corridor, the BLM conducts an inventory and analyzes the National Trail Right-of-Way as a key consideration.** The location and management of the National Trail Management Corridor is governed by FLPMA. The BLM uses the term “corridor” to refer to the area of public land surrounding the National Trail “Right-of-Way” which is described in section 7(a)(2) of the NTSA. The term “corridor” is used to reduce confusion between the National Trail Rights-of-Way and FLPMA Title V rights-of-way.” *Id. at 1-7 (emphasis added).*
- Definition of distinction between National Trail Right-Of-Way and National Trail Corridor – “Relationship between the National Trail Right-of-Way and National Trail Management Corridor. The terms, National Trail Right-of-Way and National Trail Management Corridor, are both used to describe the area of land that encompasses the designated National Trail and the resources, qualities, values, and associated settings and the primary use or uses of the National Trail. The selection of the National Trail Right-of-Way for the entire trail is the responsibility of the National Trail administering agency in the trailwide Comprehensive Plan, but is not a land use decision. The establishment of the National Trail Management Corridor is a land use allocation decision made through the Resource Management Plan, which is the responsibility of the National Trail management agency by Field Office jurisdiction along segments of the trail. Selection of the National Trail Management Corridor is guided by the strategic direction provided in the trailwide Comprehensive Plan and the inventory of the resources, qualities, values, and associated settings and the primary use or uses. *Id. at 1-7.*
- *“State Directors are responsible for . . . Ensuring that National Trails are addressed within BLM Resource Management Plans; National Trail Management Corridors are established through the land use planning process; National Trail Management Corridors are compatible across Field Office jurisdictions; and activities within the National Trail Management Corridors are conducted in accordance with the NTSA, FLPMA, national and state policies and guidance, and Resource Management Plans.”* *Id. at 1-12.*
- **“District and Field Managers are responsible for:”**
  - “Inventorying and monitoring National Trail resources, qualities, values, and associated settings and the primary use or uses of the trail.” *Id. at 1-13.*
  - **“Establishing National Trail Management Corridors** through the land use planning process, and incorporating management actions for National Trails in accordance with applicable laws and policy.” *Id. at 1-13.*
  - **“Ensuring that activities within National Trail Management Corridors are conducted in accordance with FLPMA, the NTSA, the BLM budget and related policies, and Resource Management Plans, including the consideration of guidance contained in the trailwide Comprehensive Plan.”** *Id. at 1-13 (emphasis added).*
- “Chapter 4. Congressionally Designated National Trails - Land Use Planning
  - 4.1 General Requirements
    - Addressing Designated National Trails through Land Use Planning

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

1. **As soon as practical after activation, the BLM must address designated National Trails through the land use planning process.**
  2. Designated National Trails may be addressed through a land use plan amendment, or a Statewide Trail Management Plan or a programmatic multi-state effort which amends applicable Resource Management Plans.
  3. Regardless of the type of land use planning process undertaken, the BLM shall establish a National Trail Management Corridor(s) and identify management goals, objectives, and actions for each designated National Trail.
  4. National Trails shall be clearly identified as a specific resource or discipline, in its own unique section throughout the various chapters of the Resource Management Plan - not contained within and across multiple disciplines. . . .” *Id. at 4-1(emphasis added).*
- “4.2 Requirements for Designated National Trails in Land Use Planning
    - *E. Trail Management Guidance by Resource Program.*
      1. *Scenic and Visual Resources.*
    - ...
    - VRM Class I or II designation for National Scenic Trails, where not adversely impacted by existing cultural modifications; and National Historic Trail Federal Protection Components, including high potential historic sites; high potential route segments; and other qualifying areas.” *Id. at 4-7 – 4-8.*
  - “Chapter 5. Congressionally Designated National Trails – Management
    - 5.2 General Requirements
      - . . .
      - **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 5-1(emphasis added).***
    - “5.3 Protocol for Proposed Actions which May Adversely Impact Designated National Trails
      - . . .
      - B. Determining the Scope of Analysis
        1. The BLM shall consider the significance of the Congressional designation as a National Trail (P.L. 90-543), as a unit of the NLCS (P.L.111-11), and public and private contributions and volunteer efforts along a National Trail when evaluating whether to approve a proposed action along the designated trail. The BLM shall manage the National Trails and the areas through which such National Trails may pass in a manner that recognizes the national significance of the trails and the individual or collective significance of National Historic Trail Federal Protection Components, including high potential historic sites and high potential route segments. The national significance of National Trails must be considered in the

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

local, regional, and national context under the NTSA and NHPA, as applicable.

2. If a National Trail Management Corridor has not been established in a land use plan, the BLM should undertake the following:

- i. A viewshed analysis to evaluate whether the proposed action is contained within the viewshed.
  - ii. If within the viewshed, and likely to cause adverse impact, a BLM National Trail inventory and assessment is required, and should be broad enough to be able to identify reasonable alternative project locations with potentially less or no adverse impact. Upon inventory, the area of potential adverse impact shall be delineated, encompassing the resources, qualities, values and associated settings and the primary use or uses identified.
  - iii. The BLM will identify, within the area of potential adverse impact, any adverse impacts to the nature and purposes; resources, qualities, values, and associated settings; and the primary use or uses for the affected environment, alternative formulation and analysis, and environmental consequences (see chapter 3 of this manual).
  - iv. The BLM shall consider alternatives which support National Trail purposes in accordance with this policy. The BLM will consider alternatives which direct the proposed project outside the area of potential adverse impact or to a comparably disturbed or culturally modified area, such as areas already containing transmission lines, pipelines, highways, or improved roads.” *Id.* at 5-2 – 5-3.
- *Old Spanish National Historic Trail - Comprehensive Administrative Strategy*, BLM/NPS (2017)
    - Although the CAS, as previously discussed does not meet legal requirements of a NTSA OSNHT CMP it should be referenced as a OSNHT Administrator’s policy document.
    - Pertinent sections include discussions of inventory of Trail resources, values, and opportunities; discussions regarding Trail corridor widths; etc.
  - BLM Budgetary Emphasis Programs
    - The 2024 BLM Budget states the following:

“2024 Program Direction  
Protecting Trail Resources

Manuals 6250/6280 have extensive requirements for the protection of the NSHT resources, and the Nature and Purpose of each individual trail. This work should be prioritized in coordination with trail administration and the non-profit trail partners.

...  
NSHT Inventory, Assessment, and Monitoring (IAM)

Inventory, Assessment, and Monitoring

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

Renewable Energy is a priority for the administration. NSHT Inventory, Assessment, and Monitoring is an essential part of the efficient planning efforts that support energy development and is required by BLM policy.

A National Trail Management Corridor is a land use plan allocation which is based on the Section 7(a)(2) of the National Trails System Act. The National Trail Management Corridor should include an area of sufficient width to encompass the National Trail resources, qualities, values, and associated settings and the primary use or uses that are present or to be restored. The inventory process will identify the potential area of adverse impact on these resources, within the viewshed; prevent substantial interference; and determine any areas unsuitable for development.

Inventories must be completed to properly inform the Management Corridor. When RMPS's are outdated and/or a NSHT corridor is not established in a land use plan, an accepted National Trail inventory process should be conducted by the office or the applicant, in consultation with the trail administering agency and partners."

All the foregoing statutory and policy requirements related to administration and management of NTs, including issuance of a CMP, designation of a NTSA right-of-way with width, BLM inventories of Trail resources and values with assistance of Trail Administrators, and BLM establishment of Trail management corridors should occur before proposals such as the oil and gas lease sales can proceed.

- **Federal Case Law Prohibits the Development of Subsidiary Land Use Plans, such as the BLM's 2008 Moab Field Office Area Resource Management Plan Prior to the Completion and Adoption of Applicable, Statutorily Required Plans, Such as the OSNHT CMP**

From a legal standpoint, the federal courts have held that failure to meet procedural planning requirements of federal land management law is potentially actionable and may preclude other agency actions that arguably without completion of required plans may contravene statutory protection of lands, waters, or related resources - qualities and values that would otherwise be protected if plans had been completed in timely fashion. (See *Sierra Club v. Babbitt*, 69 F. Supp. 2d 1202 (E.D. Cal. 1999), and, *Friends of Yosemite Valley v. Kempthorne*, 464 F. Supp. 2d 993 (E.D.Cal.2006), and, *Friends of Yosemite Valley v. Kempthorne*, 520 F.3d 1024 (9th Cir. 2008)). Completion of the BLM Moab Field Area RMP prior to completion of the statutorily mandated CMP for the OSNHT makes the RMP at least partially invalid in regard to the areas crossed by the OSNHT. Consequently, the proposed actions taken subject to the RMPs on lands crossed by, and proximate to the OSNHT are invalid. Before any such actions proceed, the CMP must be completed subject to NEPA requirements. Following that, the inventory and corridor setting procedures of BLM Manual 6280 must be fulfilled and the RMPs amended, subject to NEPA requirements, to properly address OSNHT management and protection.

### **SPECIFIC LOCATIONAL RELATIONSHIP BETWEEN PROPOSED LEASE PARCELS AND THE OSNHT**

The DOI, Co-Administrator's, and BLM failure to complete a CMP, set a NTSA right-of-way with applicable width, inventory OSNHT resources and values, and set Trail management corridors, as well as to follow NTSA required procedures when recommending changes to Trail alignment; and, yet issuance of contradictory maps of the Trail, and attestations of formal Trail realignments has created a horrific

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

mess of reliable public information, and rendered evaluations of potential harm from proposed actions virtually impossible.

The BLM National NEPA Register (E Planning website) scoping announcement for this project includes “pdf” maps and map data intended to show the location of the lease parcels to be offered as part of the “BLM Utah 2026 Second Quarter Competitive Oil and Gas Lease Sale.”

Those lease offerings within the Moab Field Office Area and close to the OSNHT are on Map 1 As previously stated, there are major failings of preparatory work related to management and protection of the OSNHT required to make this action valid and allow its progression, however, no matter what, the legal location of the OSNHT should be shown on all proposal maps.

The “pdf” maps are too small scale to easily determine the location of the Trail and distance of the Trail from each proposed lease parcel. As a result, we have researched existing GIS maps most accessible to the public – those posted by the BLM and NPS Co-Administrators at the ESRI ARCGIS Online website, and from the BLM E Planning Map Data access. These include the following maps:

- UT\_2026\_Q3\_Lease\_Sale\_20260316 – BLM map showing UT 2026\_Qtr. 3 proposed lease parcels;
- Old Spanish National Historic Trail feasibility study alignment ([https://services1.ArcGIS.com/fBc8EJBxQRMchlei/ArcGIS/rest/services/OLSP\\_NHT/FeatureServer](https://services1.ArcGIS.com/fBc8EJBxQRMchlei/ArcGIS/rest/services/OLSP_NHT/FeatureServer)) – Author - ntirres\_nps, added to ARCGIS Online on Jan. 04, 2025. It should be noted that this Co-Administrator map of the “feasibility study alignment” of the Trail is presumably the same as the enacted congressional line cited in 16 U.S.C. §1244(a)(23) (i.e., the OSNHT congressionally enacted line before any Secretarial or Administrator modification). This presumption seems verifiable through a close comparative examination of the Feasibility Study maps found at – *National Historic Trail Feasibility Study and Environmental Assessment – Old Spanish Trail*, Department of the Interior, National Park Service (July, 2001), *Appendix C – Maps*.
- OLSP\_CAS\_Line\_201801 – a map previously available on ARCGIS Online showing the line as recommended to be adjusted pursuant to the issuance of the Co- Administrator’s *Old Spanish National Historic Trail Comprehensive Administrative Strategy (CAS)*, United States Department of the Interior, Bureau of Land Management, National Park Service (December, 2017) (Map author ntirres\_nps). This map was available on ARCGIS Online until relatively recently – December, 2025. **It should be recognized that OSNHT alignments contained in the CAS are in violation of the NTSA and NEPA and BLM policy, and should be considered no more than recommended by the Co-Administrators until such time as properly processed, and analyzed via NEPA with public input and review.**
- OLSP NHT Congressionally Designated Alignment – [https://services1.ArcGIS.com/fBc8EJBxQRMchlei/ArcGIS/rest/services/OLSP\\_CAS\\_Line\\_201801/FeatureServer](https://services1.ArcGIS.com/fBc8EJBxQRMchlei/ArcGIS/rest/services/OLSP_CAS_Line_201801/FeatureServer) a map currently available on ARCGIS Online – Author – ntirres\_nps, added to ARCGIS Online on August 4, 2025, asserting to show the congressionally designated alignment of the Trail, but actually showing the aforementioned, procedurally faulted Co-Administrator CAS recommended alignment. Again, it should be noted that the “congressionally designated alignment” is the same as the feasibility study line as explained at 16 U.S.C. §1244(a)(23), and that no Secretarial or Co-Administrator realignment has been properly legally or procedurally made, via the CAS or otherwise. The noted ntirres\_nps (NPS Co-Administrator) map information even goes so far as to erroneously explain: “Old Spanish NHT congressionally designated alignment as depicted in the Comprehensive Administrative Strategy.” See ARCGIS Online weblink (and background information) provided above. **However, the**

**Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)**

**congressionally designated alignment is not depicted in the CAS. What is depicted there is the Co-Administrator’s recommended realignment, which as explained, has not been properly adopted.<sup>6</sup>**

Only through knowledgeable and extremely time-consuming review of applicable GIS map data is it possible to ascertain the geographical relationship between the O&G lease offerings and the congressionally enacted Trail alignment. Furthermore, it is also possible to ascertain the geographical relationship between the lease offerings and the recommended Co-Administrator realignment put forth in the CAS. **Clearly, however, better detailed mapping information, and legitimate labeling, must be made available to the public for any EA related to this proposal in the future. Furthermore, the problems concerning alignment of the Trail are indicative of and part of the Secretary’s and Co-Administrators failure to effectuate all Trail administrative and management work required before any consideration of possibly negative, “substantially interfering” land uses may be initiated.**

The following table shows the relationship between the proposed leases noted in these scoping comments and: (1) the congressionally enacted Trail – North Branch Route alignment; (2) the congressionally enacted Northern Route alignment; and (3) the Co-Administrators recommended, but legally non-compliant North Branch Route realignment depicted in the CAS and actually consisting of two realignment tracks in the project area – one northerly east to west realignment track, and one southerly east to west track. It should also be noted that the enacted Co-Administrators’ Northern Route realignment recommendation in the project area is the same as the congressionally enacted Northern Route alignment. A depiction of all the noted information is also shown on a ARCGIS generated, and denoted, map, attached as Appendix A to these comments.<sup>7</sup>

	<b>Parcel 1805</b>	<b>Parcel 7941</b>	<b>Parcel 7935</b>	<b>Parcel 1806</b>	<b>Parcel 7937</b>	<b>Parcel 1809</b>	<b>Parcel 7947</b>
<b>Crossed by N. Branch Cong. Alignment</b>		X		X			
<b>Crossed by N. Branch CAS Recommendation (2 tracks N &amp; S)</b>	X (S & N)	X (S)	X (N)	X (S)	X (N)	X (N)	
<b>Distance from N. Branch Cong. Alignment (1 track in proj. vicinity)</b>	0.24 mi.	0	1.18 mi.	0	1.65 mi.	0.33 mi.	1.61 mi.
<b>Distance from N. Branch CAS Recommendation (2 tracks N &amp; S)</b>	0	S - 0 N - 0.22 mi.	N - 0 S - 1.01 mi.	S - 0 N - 0.67 mi.	N - 0 S - 1.74 mi.	N - 0 S - 0.74 mi.	S - 1.83 mi. N - 2.42 mi.

<sup>6</sup> Note that the map author ntirres\_nps is the National Park Service, Long Distance Trails Office in Santa Fe, NM – the office which is managed by the NPS delegated Co-Administrator of the OSNHT.

<sup>7</sup> The map so provided as Appendix A was generated from OSNHT Co-Administrators’ maps previously mentioned and the map data provided by BLM related to this project proposal. The Appendix A map has been correctly relabeled to show both congressionally designated alignments of the OSNHT and Co-Administrator recommended realignments of the OSNHT routes. The map also shows ARCGIS distance measurements of each project parcel from congressionally designated alignments and Co-Administrator recommended realignments.

**Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)**

<b>Distance from Northern Route Cong. &amp; CAS Rec. Alignment (Cong. &amp; CAS Rec. Alignment overlie each other in project vicinity)</b>	1.39 mi.	0.97 mi.	3.02 mi.	1.23 mi.	3.69 mi.	2.96 mi.	0.10 mi.
--	----------	----------	----------	----------	----------	----------	----------

As previously stated, any Co-Administrator CAS recommendation of high potential route segments of the OSNHT in the project area is legally irrelevant as all portions of the OSNHT are Federal protection components of the Trail and all subject to the requirement that the Secretary issue a determination of no substantial interference with the nature and purposes of the Trail for the project to be cleared. However, it should be noted that the Co-Administrators have recommended and designated the North Branch route(s) through the project area as a high potential route segment of the Trail. In its EA, BLM must, therefore, analyze this recommendation and its bearing on project alternatives or assessments.

Again, no legally compliant realignment of the OSNHT congressionally enacted Trail location has been achieved. The NTSA states the following in regard to Secretarial changes to the alignment of NTs: Pursuant to section 1244 (a) of this title, the appropriate Secretary shall select the rights-of-way for national scenic and national historic trails and shall publish notice of the availability of appropriate maps or descriptions in the Federal Register (*see* 16 U.S.C. §1246(a)(2)) . . .

After publication of notice of the availability of appropriate maps or descriptions in the Federal Register, the Secretary charged with the administration of a national scenic or national historic trail may relocate segments of a national scenic or national historic trail right-of-way, with the concurrence of the head of the Federal agency having jurisdiction over the lands involved, upon a determination that:

- (i) such a relocation is necessary to preserve the purposes for which the trail was established, or
- (ii) the relocation is necessary to promote a sound land management program in accordance with established multiple-use principles: Provided, That a substantial relocation of the rights-of-way for such trail shall be by Act of Congress. (*see* Id. at §1246(b)).

Due to the fact that no CMP has ever been developed by the Secretary or Co-Administrators in accordance with NTSA; no NTSA right-of-way has ever been published by the Secretary or Co-Administrators; and, the faulted CAS including its recommended Trail realignments has failed to proceed through proper NEPA compliance, the Trail alignment, and the Trail’s relationship to the proposed lease sales parcels is in limbo and must be addressed for the effects of the current project proposal to be properly assessed.

As described in the foregoing mapping and locational discussion, the current alignment of the Trail is contradictory, with no clear legal certainty of whether the congressionally enacted alignment, or the recommended, yet legally insufficient Co-Administrator’s CAS alignment applies for such purposes as policy required Trail inventories of resources and values, or refinement of a Trail management and

---

<sup>8</sup> Note that regardless of which OSNHT alignment is recognized as official, all the proposed oil and gas lease sale parcels lie within the arguable and likely legally required OSNHT NTSA right-of-way, and BLM Manual 6280 Trail management corridors, neither of which have been formally determined although required by law and policy. In addition, 6 of 7 of the parcels are crossed by alignments and the one other is within 1/10 mile of an alignment; and, all parcels are within 3.69 miles of ALL alignments.

## Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

protection corridor, and ultimately a Secretarial decision as to whether the proposed lease sales can be offered without adverse impacts to the nature and purposes of the Trail. Given these complications and uncertainties created through BLM's own administration, mismanagement, and non-management of the OSNHT, the project EA should consider project effects on all existing legal and Co-Administrator recommended alignments of the Trail. And, given the proximate locations of differing alignments and routes it is recommended that effects of the leasing of each independent parcel on ALL said alignments needs evaluation to protect the Trail as dictated by Congress.

### CONCLUSION

The lease sales proposal and its potential impacts on the OSNHT cannot be properly assessed, and should arguably wait for a CMP to be developed in accordance with NTSA; a NTSA right-of-way to be published in accordance with NTSA; and other agency policy directives to be fulfilled, including precise locations of Trail alignments. The widths of such NTSA ROWs and agency Trail management corridors must also be established based on thorough Trail inventories of resources and values conducted in accordance with BLM Manual 6280 and associated technical guidance. Manual 6280 dictates that said inventories include not only cultural resources associated with the Trail, but natural resources as well, and landscapes associated with or restored to the Trails period of significance established by Congress of 1829 – 1848. All these resources must be protected to ensure the public's opportunity for experiential visitation, principally non-motorized recreation, and enlightenment/education intended by Congress. Although some modern developments exist along the pertinent sections of the Trail, such as Interstate Highway 70, the old highway, and the railroad, these particular transportation developments should be seen as pre-existing passages that can complement public visitation and enjoyment of the landscape of the OSNHT (auto tour routes, possible pre-existing secondary motorized vehicle routes, and trail tourism routes), and not as detractions from the landscape that are contrary to congressional intent.

Development of oil and gas leasing on the noted parcels, would on the other hand degrade the nature and purposes of the Trail and its landscape. Therefore, an EA alternative to remove these parcels from consideration for oil and gas leasing is advocated and should be strongly considered.

Thank you for the opportunity to submit these scoping comments. Please consider each of the signatory parties to these comments to be interested parties regarding this proposed action and keep the parties informed of subsequent related actions.

/s/  
John W. Hiscock, JD<sup>9</sup>

/s/  
Chandra Rosenthal  
Rocky Mountain Regional Director  
Public Employees for Environmental Responsibility

/s/  
Emily Thompson  
Executive Director  
The Coalition to Protect America's National Parks

/s/  
Landon Newell  
Staff Attorney  
Southern Utah Wilderness Alliance

---

<sup>9</sup> John Hiscock is a retired 38 year veteran of the National Park Service, having worked as a park ranger, regulatory specialist, superintendent, state coordinator, and leader of numerous management initiatives. He also served as Association Manager (retired) and is a life member of the Old Spanish Trail Association. He is also a member of PEER, CPANP, the Southern Utah Wilderness Alliance, and the Western Watersheds Project.

**Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)**

/s/

Laura Welp  
Ecosystems Specialist  
Western Watersheds Project

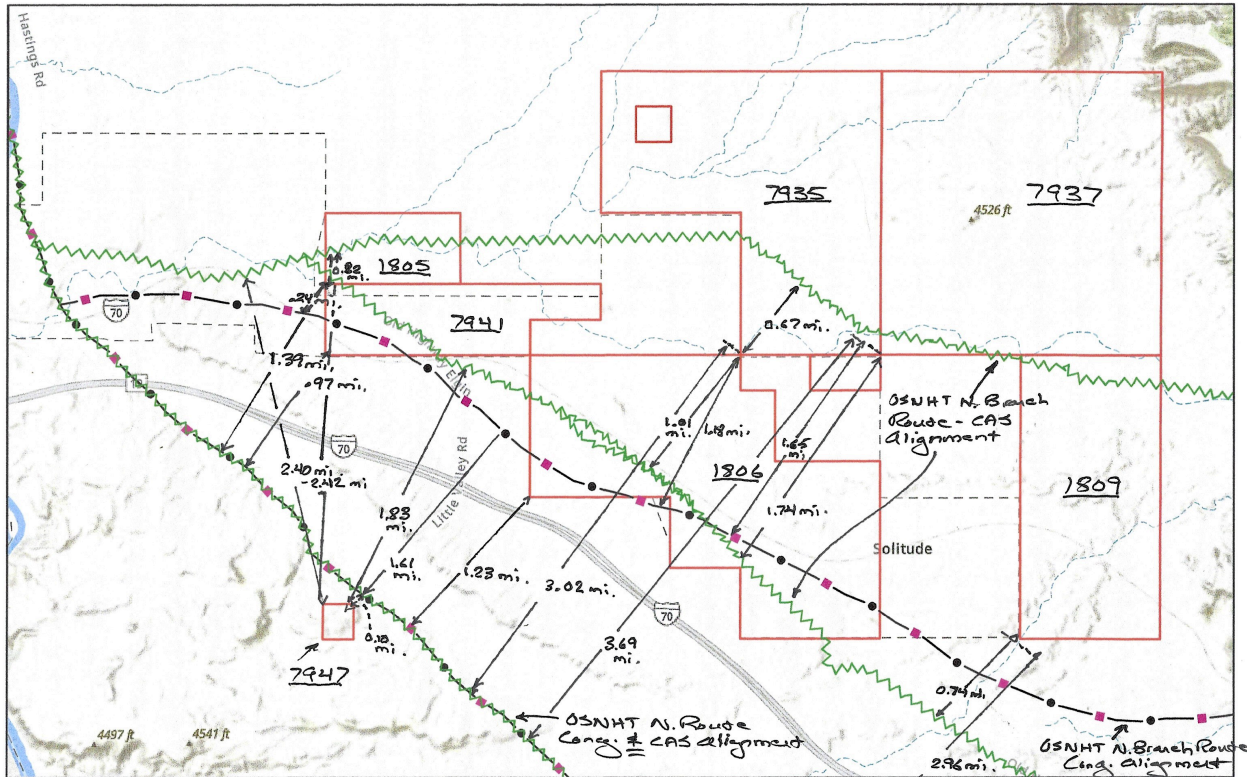
/s/

Kevin Emmerich  
Co-Founder  
Basin and Range Watch

Appendix A to Hiscock, et. al. EA Cmts. (6-22-26)

Leppenkix Pt.

BLM 2026 3rd Qtr O G - OSNHT Cong Line - CAS Recommended Line



4/13/2026

OLSP NHT Co-Administrator CAS Recommended Alignment

OLSP Feasibility Study/Cong Alignment

World\_Hillshade

